

Erik F. Stidham (ISB #5483)
Jennifer M. Jensen (ISB #9275)
Zachery J. McCraney (ISB #11552)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com
jmjensen@hollandhart.com
zjmccraney@hollandhart.com

Counsel for Plaintiffs

**IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA**

ST. LUKE'S HEALTH SYSTEM, LTD; ST.
LUKE'S REGIONAL MEDICAL CENTER,
LTD; CHRIS ROTH, an individual;
NATASHA D. ERICKSON, MD, an
individual; and TRACY W. JUNGMAN, NP,
an individual,

Plaintiffs,

vs.

AMMON BUNDY, an individual; AMMON
BUNDY FOR GOVERNOR, a political
organization; DIEGO RODRIGUEZ, an
individual; FREEDOM MAN PRESS LLC, a
limited liability company; FREEDOM MAN
PAC, a registered political action committee;
and PEOPLE'S RIGHTS NETWORK, a
political organization,

Defendants.

Case No. CV01-22-06789

**DECLARATION OF ERIK F. STIDHAM
IN SUPPORT OF MOTION FOR
SANCTIONS AS TO DIEGO RODRIGUEZ,
POWER MARKETING CONSULTANTS,
LLC, POWER MARKETING AGENCY,
LLC, AND FREEDOM TABERNACLE,
INCORPORATED FOR FAILURE TO
APPEAR AT PROPERLY NOTICED
DEPOSITONS**

I, Jennifer M. Jensen, being first duly sworn upon oath, depose and state as follows:

**DECLARATION OF ERIK F. STIDHAM IN SUPPORT OF MOTION FOR
SANCTIONS AS TO DIEGO RODRIGUEZ, POWER MARKETING
CONSULTANTS, LLC, POWER MARKETING AGENCY, LLC, AND
FREEDOM TABERNACLE, INCORPORATED FOR FAILURE TO APPEAR AT
PROPERLY NOTICED DEPOSITONS - 1**

1. I am an attorney with the firm of Holland & Hart LLP (“Holland & Hart”) and serve as counsel for the Plaintiffs in this case. I make this declaration based on my personal knowledge.
2. On April 25, 2023 the court issued an Order Granting Plaintiffs’ Motion for Sanctions Against Rodriguez for Failure to Comply with Court Orders.
3. Attached hereto as **Exhibit A** is a true and correct copy of the January 9, 2013 Secretary of State, State of Idaho’s Certificate of Organization Limited Liability Company for Power Marketing Consultants LLC showing Diego Rodriguez as the registered agent.
4. Attached hereto as **Exhibit B** is a true and correct copy of a screenshot of the webpage <https://diegorodriguez.org/>, taken at my direction.
5. Attached hereto as **Exhibit C** is a true and correct copy of the February 4, 2011 Secretary of State, State of Idaho Articles of Incorporation (Non-Profit) for Freedom Tabernacle, Incorporated showing Diego Rodriguez as the registered agent.
6. Attached hereto as **Exhibit D** is a true and correct copy of the April 27, 2023 Second Amended Notice of Videotaped Deposition of Diego Rodriguez. Mr. Rodriguez was served this notice via iCourt on April 27, 2023; proof of iCourt service is attached to this exhibit.
7. Attached hereto as **Exhibit E** is a true and correct copy of the December 27, 2022 Notice of Intent to Serve Subpoena Duces Tecum to Power Marketing Agency, LLC.

8. Attached hereto as **Exhibit F** is a true and correct copy of the April 27, 2023 Amended Subpoena for Deposition Duces Tecum of Power Marketing Agency, LLC. Power Marketing Agency, LLC was served on April 28, 2023 at the address of 9169 W. State St., Ste 3177, Boise, ID 83714 by Tri-County Process Service, a copy is attached to this exhibit.

9. Attached hereto as **Exhibit G** is a true and correct copy of the December 27, 2022 Notice of Intent to Serve Subpoena Duces Tecum to Power Marketing Consultants LLC.

10. Attached hereto as **Exhibit H** is a true and correct copy of the May 5, 2023 Amended Subpoena for Deposition Duces Tecum of Power Marketing Consultants LLC. Power Marketing Consultants LLC was served on May 5, 2023 at the address of 1317 Edgewater Dr., #5077, Orlando, FL by Magic Process, a copy is attached to this exhibit.

11. Attached hereto as **Exhibit I** is a true and correct copy of the December 27, 2022 Notice of Intent to Serve Subpoena Duces Tecum to Freedom Tabernacle, Incorporated.

12. Attached hereto as **Exhibit J** is a true and correct copy of the May 5, 2023 Amended Subpoena for Deposition Duces Tecum of Freedom Tabernacle Incorporated. Freedom Tabernacle Incorporated was served on May 5, 2023 at the address of 1317 Edgewater Dr., #5077, Orlando, FL by Magic Process, a copy is attached to this exhibit.

13. Attached hereto as **Exhibit K** are true and correct copies of emails between Mr. Diego Rodriguez and Erik Stidham regarding scheduling of the above depositions and a request to respond as to whether he will attend each.

14. Attached hereto as **Exhibit L** are true and correct copies of emails between the court reporter at Tucker & Associates and Mr. Rodriguez regarding these depositions.

DECLARATION OF ERIK F. STIDHAM IN SUPPORT OF MOTION FOR SANCTIONS AS TO DIEGO RODRIGUEZ, POWER MARKETING CONSULTANTS, LLC, POWER MARKETING AGENCY, LLC, AND FREEDOM TABERNACLE, INCORPORATED FOR FAILURE TO APPEAR AT PROPERLY NOTICED DEPOSITONS - 3

I declare under penalty of perjury of the laws of the State of Idaho that the foregoing is true and correct.

DATED: May 26, 2023

By: /s/Erik F. Stidham
Erik F. Stidham

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of May, 2023, I caused to be filed, via iCourt, and served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Ammon Bundy for Governor
P.O. Box 370
Emmett, ID 83617

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Ammon Bundy for Governor
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

- U.S. Mail
- Hand Delivered via process server
- Overnight Mail
- Email/iCourt/eServe:

Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

- U.S. Mail
- Hand Delivered via process server
- Overnight Mail
- Email/iCourt/eServe:

People's Rights Network
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

- U.S. Mail
- Hand Delivered via process server
- Overnight Mail
- Email/iCourt/eServe:

People's Rights Network
c/o Ammon Bundy
P.O. Box 370
Emmett, ID 83617

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Freedom Man Press LLC
c/o Diego Rodriguez
1317 Edgewater Dr. #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Freedom Man Press LLC
c/o Diego Rodriguez
9169 W. State St., Ste. 3177
Boise, ID 83714

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Freedom Man PAC
c/o Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:
freedommanpress@protonmail.com

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

21535435_v1

Exhibit A



CERTIFICATE OF ORGANIZATION LIMITED LIABILITY COMPANY

(Instructions on back of application)

2013 JAN -9 AM 9: 07

SECRETARY OF STATE
STATE OF IDAHO

1. The name of the limited liability company is:

Power Marketing Consultants LLC

2. The complete street and mailing addresses of the initial designated office:

1883 N Wildwood St, Boise, ID 83713

(Street Address)

(Mailing Address, if different than street address)

3. The name and complete street address of the registered agent:

Diego Rodriguez

1883 N Wildwood St, Boise, ID 83713

(Name)

(Street Address)

4. The name and address of at least one member or manager of the limited liability company:

Name

Address

Diego Rodriguez

11243 W Marlinwood St, Boise, ID 83713

5. Mailing address for future correspondence (annual report notices):

1883 N. Wildwood St, Boise, ID 83713

6. Future effective date of filing (optional): _____

Signature of a manager, member or authorized person.

Signature DIEGO RODRIGUEZ

Typed Name: Diego Rodriguez

Signature _____

Typed Name: _____

Secretary of State use only

IDAHO SECRETARY OF STATE
01/09/2013 05:00
CK: 5216 CT: 278825 BH: 1354992
1 @ 100.00 = 100.00 ORGAN LLC # 2

W120780

Exhibit B



DIEGO RODRIGUEZ



ABOUT DIEGO

Who is Diego Rodriguez? And how can he help my business?

FREE RESOURCES

Get FREE Resources for Business Growth and Personal Development

PRODUCTS

Marketing, Recruitment, Video, and Time Management Products

Meet Diego Rodriguez

Diego Rodriguez is an author, motivational speaker, and entrepreneur. Currently, he is serving as the President of Power Marketing International, which consists of the Power Marketing Consultants Network—the largest international network of professional marketing consultants in the world, the Power Marketing Agency—which is the premier marketing agency for total market domination, and the Power Marketing Pantheon—the preeminent business network and training source for business growth and development.



"Diego doesn't just teach people how to think differently and overcome limiting beliefs. He's done it himself and he continues to do so. His enthusiasm is infectious. I'd encourage anyone and everyone to take advantage of his business systems and concepts." - **Robert Allen, New York Times Best Selling Author**



"Diego is the most talented local marketer I've ever met. If I got hit by a bus...Diego is the guy I'd choose to take my place. And if my son wanted to become a consultant and I wasn't around to teach him...I would want Diego to be the person to give him guidance." - **Frank Kern, Legendary Online Marketer**



"Diego is not only a personal friend and confidante, but he is one of the most brilliant marketers I've ever met. His successes speak for themselves and his systems are the best you'll find anywhere." - **Mike Koenigs, Traffic Geyser**



"Diego is one of the most brilliant marketing minds anywhere. He simply knows what works and he gets it done. He's helped our company greatly and I'd encourage anybody who gets the chance to work with him to do so!" - **Eric Lofholm - Eric Lofholm International (Sales Trainer for Tony Robbins)**

Diego is a highly sought after business growth consultant and was trained by Jay Abraham. He is the Senior Consultant and training director for the Power Marketing Pantheon. He was also the primary trainer in Mike Koenig's Instant Customer Revolution program and he has trained over 8,000 entrepreneurs in over 40 countries.

He was the creator of the HVAC Mastery Program (for Contractors), the PI Mastery Program (for Personal Injury Attorneys), and the Dental Mastery Program (for Dentists). He was also the creator of the marketing and business development program for Drone Command Live and the Sky Eye Network (for Drone operators).

Diego's *Power Marketing Program* has a 100% success record of growing any business in any industry and of any size. He has consulted businesses using the *Power Marketing Program* in dozens of industries across the world.

Diego also serves as the Communications Director for the Freedom Man PAC and commonly writes articles about freedom liberty, the Constitution, and the founding principles of America under the pseudonym, Gunner Steele.



Sign Up for the NEXT DIEGOCAST!



Visit Power Marketing

POPULAR LINKS:

- About Diego
- Free Resources
- Products
- Power Marketing

[Contact Diego](#)

CONTACT:
1317 Edgewater Dr. Suite 5077
Orlando, FL 32804
(321) 977-1444

SITE INFORMATION:
[Privacy Policy](#)
[Terms and Conditions](#)
[Site Map](#)

SOCIAL MEDIA LINKS:



Exhibit C



ARTICLES OF INCORPORATION (Non-Profit)

FILED EFFECTIVE

(Instructions on back of application)

The undersigned, in order to form a Non-Profit Corporation under the provisions of Title 30, Chapter 3, Idaho Code, submits the following articles of incorporation to the Secretary of State.

11 FEB -4 AM 8:29

SECRETARY OF STATE
STATE OF IDAHO

Article 1: The name of the corporation shall be:

Freedom Tabernacle, Incorporated

Article 2: The purpose for which the corporation is organized is:

To establish and maintain a church for religious worship.

Article 3: The street address of the registered office is: 5056 W Charles St, Meridian, ID 83646

and the registered agent at such address is: Diego Rodriguez

Article 4: The board of directors shall consist of no fewer than three (3) people. The names and addresses of the initial directors are:

Diego Rodriguez, 5056 W Charles St, Meridian, ID 83646

Article 5: The name(s) and address(es) of the incorporator(s):

Diego Rodriguez, 5056 W Charles St, Meridian, ID 83646

Article 6: The mailing address of the corporation shall be:

Freedom Tabernacle, 5056 W Charles St, Meridian, ID 83646

Article 7: The corporation (does does not) have voting members.

Article 8: Upon dissolution the assets shall be distributed:

On the dissolution or winding up of the corporation, its assets remaining after payment of, or provision for payment of, all debts and liabilities of this corporation, shall be distributed to a non profit fund, foundation, or corporation which is organized and operated exclusively for religious purpose and which has established its tax-exempt status under Section 501(c)(3) of the Internal Revenue Code.

Signatures of all incorporators:

Diego Rodriguez
TypedName:

TypedName:

TypedName:

TypedName:

TypedName:

Customer Acct #:

(if using pre-paid account)

Secretary of State use only

g:\corp\forms\corp_forms\articlesofincprofit.p65
Revised 07/2002

IDAHO SECRETARY OF STATE
02/04/2011 05:00
CK: 2419 C1: 255126 BH: 1258589
1 @ 30.00 = 30.00 INC NONP # 2

C189972

Exhibit D

Erik F. Stidham (ISB #5483)
Jennifer M. Jensen (ISB #9275)
Zachery J. McCraney (ISB #11552)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com
jmjensen@hollandhart.com
zmccraney@hollandhart.com

**IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA**

ST. LUKE'S HEALTH SYSTEM, LTD; ST.
LUKE'S REGIONAL MEDICAL CENTER,
LTD; CHRIS ROTH, an individual;
NATASHA D. ERICKSON, MD, an
individual; and TRACY W. JUNGMAN, NP,
an individual,

Plaintiffs,

vs.

AMMON BUNDY, an individual; AMMON
BUNDY FOR GOVERNOR, a political
organization; DIEGO RODRIGUEZ, an
individual; FREEDOM MAN PRESS LLC, a
limited liability company; FREEDOM MAN
PAC, a registered political action committee;
and PEOPLE'S RIGHTS NETWORK, a
political organization,

Defendants.

Case No. CV01-22-06789

**SECOND AMENDED NOTICE OF
VIDEOTAPED DEPOSITION OF DIEGO
RODRIGUEZ**

TO: DIEGO RODRIGUEZ
Via iCourt: freedommanpress@protonmail.com

PLEASE TAKE NOTICE THAT Plaintiffs, St. Luke's Health System, Ltd, St. Luke's
Regional Medical Center, Ltd, Chris Roth, Natasha D. Erickson, MD, and Tracy W. Jungman,

AMENDED SECOND AMENDED NOTICE OF VIDEOTAPED DEPOSITION OF
DIEGO RODRIGUEZ - 1

NP, will take the testimony and oral examination of **DIEGO RODRIGUEZ**, before an official Videographer, Court Reporter and Notary Public for the State of Idaho, on ***Friday, May 12, 2023 at 9:00 a.m. MDT, and Monday, May 15, 2023, at 9:00 a.m. MDT***, at the following location:

Holland & Hart LLP
800 W. Main Street, Ste. 1750
Boise, Idaho 83702

at which time and place the deponent is notified to appear and take part in said examination.

This deposition shall be taken pursuant to the Idaho Rules of Civil Procedure and as directed by the Court's Order Compelling Ammon Bundy, Ammon Bundy for Governor, and People's Rights Network to Respond to Discovery and Notices of Deposition, dated April 24, 2023.

DATED: April 27, 2023.

HOLLAND & HART LLP

By: */s/Erik F. Stidham*

Erik F. Stidham

Jennifer M. Jensen

Zachery J. McCraney

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of April, 2023, I caused to be filed and served, via iCourt, a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Ammon Bundy for Governor
P.O. Box 370
Emmett, ID 83617

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Ammon Bundy for Governor
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

People's Rights Network
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

People's Rights Network
c/o Ammon Bundy
P.O. Box 370
Emmett, ID 83617

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Freedom Man Press LLC
c/o Diego Rodriguez
1317 Edgewater Dr. #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Freedom Man Press LLC
c/o Diego Rodriguez
9169 W. State St., Ste. 3177
Boise, ID 83714

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Freedom Man PAC
c/o Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:
freedommanpress@protonmail.com

Tucker & Associates Court Reporting

notice@etucker.net

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

21374716_v1

Case # CV01-22-06789 - St Lukes Health System LTD, St Lukes Reg

Envelope Information

Envelope Id
6055028

Submitted Date
4/27/2023 3:27 PM MST

Submitted User Name
cmcarvalho@hollandhart.com

Case Information

Location
Ada County District Court

Category
Civil

Case Type
AA - All Initial District Court Filings (Not Listed In: E, F, and H1)

Case Initiation Date
5/11/2022

Case #
CV01-22-06789

Assigned to Judge
Norton, Lynn G.

Filings

Filing Type
Serve

Filing Code
Service Only


Filing Description
Subpoena Duces Tecum to Ada County
Prosecutor's Office

Filing Status
Served

Service Document

File Name	Description	Security	Download
Subpoena DT to Ada Co Prosecutor's Office.pdf	Subpoena DT to Ada Co Prosecutor's Office.pdf		Original File Court Copy

eService Details

Status	Name	Firm	Served	Date Opened
Sent	Diego Rodriguez	Individual	Yes	4/28/2023 11:08 PM MST
 Support	ntake Team	Holland & Hart LLP	Yes	4/27/2023 4:38 PM MST

Status	Name	Firm	Served	Date Opened
Sent	Erik Stidham	Holland & Hart LLP	Yes	Not Opened
Sent	Jennifer Jensen	Holland & Hart LLP	Yes	Not Opened
Sent	Zack McCraney	Holland & Hart LLP	Yes	Not Opened

Filing Type

Serve

Filing Code

Service Only

Filing Description

Second Amended Notice of Videotaped
Deposition of Diego Rodriguez

Filing Status

Served

Service Document

File Name	Description	Security	Download
Second Amended Notice of Deposition of Diego Rodriguez.pdf	Second Amended Notice of Deposition of Diego Rodriguez.pdf		Original File Court Copy

eService Details

Status	Name	Firm	Served	Date Opened
Sent	Boise Intake Team	Holland & Hart LLP	Yes	4/27/2023 4:39 PM MST
Sent	Erik Stidham	Holland & Hart LLP	Yes	Not Opened
Sent	Jennifer Jensen	Holland & Hart LLP	Yes	Not Opened
Sent	Zack McCraney	Holland & Hart LLP	Yes	Not Opened
Sent	Diego Rodriguez	Individual	Yes	4/28/2023 11:07 PM MST

Filing Type

Serve

Filing Code

Service Only

Filing Description

Notice of Videotaped Deposition of
Ammon Bundy

Filing Status

Served

Service Document

File Name	Description	Security	Download
Notice of Videotaped Deposition of Ammon Bundy.pdf	Notice of Videotaped Deposition of Ammon Bundy.pdf		Original File Court Copy

eService Details

Status	Name	Firm	Served	Date Opened
Sent	Jennifer Jensen	Holland & Hart LLP	Yes	Not Opened
Sent	Zack McCraney	Holland & Hart LLP	Yes	Not Opened
Sent	Erik Stidham	Holland & Hart LLP	Yes	Not Opened
Sent	Boise Intake Team	Holland & Hart LLP	Yes	4/27/2023 4:39 PM MST
Sent	Diego Rodriguez	Individual	Yes	4/28/2023 11:07 PM MST

Filing Type

Serve

Filing Code

Service Only

Filing Description

Notice of Videotaped Deposition of People's Rights Network Pursuant to I.R.C.P. 30(b)(6)

Filing Status

Served

Service Document

File Name	Description	Security	Download
Notice of Videotaped Deposition of People's Rights Network 30(b)(6).pdf	Notice of Videotaped Deposition of People's Rights Network 30(b)(6).pdf		Original File Court Copy

eService Details

Status	Name	Firm	Served	Date Opened
Sent	Zack McCraney	Holland & Hart LLP	Yes	Not Opened
Sent	Jennifer Jensen	Holland & Hart LLP	Yes	Not Opened
Sent	Erik Stidham	Holland & Hart LLP	Yes	Not Opened
Sent	Boise Intake Team	Holland & Hart LLP	Yes	4/27/2023 4:40 PM MST
Sent	Diego Rodriguez	Individual	Yes	4/28/2023 11:07 PM MST

Filing Type

Serve

Filing Code

Service Only

Filing Description

Notice of Videotaped Deposition of Ammon Bundy for Governor Pursuant to I.R.C.P. 30(b)(6)

Filing Status

Served

Service Document

File Name	Description	Security	Download
Notice of Videotaped Deposition of Ammon Bundy for Governor 30(b)(6).pdf	Notice of Videotaped Deposition of Ammon Bundy for Governor 30(b)(6).pdf		Original File Court Copy

eService Details

Status	Name	Firm	Served	Date Opened
Sent	Zack McCraney	Holland & Hart LLP	Yes	Not Opened
Sent	Jennifer Jensen	Holland & Hart LLP	Yes	Not Opened
Sent	Erik Stidham	Holland & Hart LLP	Yes	Not Opened
Sent	Boise Intake Team	Holland & Hart LLP	Yes	4/27/2023 4:41 PM MST
Sent	Diego Rodriguez	Individual	Yes	4/28/2023 11:07 PM MST

Filing Type

Serve

Filing Code

Service Only

Filing Description

Amended Subpoena Duces Tecum of Power Marketing Agency, LLC

Filing Status

Served

Service Document

File Name	Description	Security	Download
Amended Subpoena DT to Power Marketing Agency.pdf	Amended Subpoena DT to Power Marketing Agency.pdf		Original File Court Copy

eService Details

Status	Name	Firm	Served	Date Opened
Sent	Zack McCraney	Holland & Hart LLP	Yes	Not Opened
Sent	Jennifer Jensen	Holland & Hart LLP	Yes	Not Opened
Sent	Erik Stidham	Holland & Hart LLP	Yes	Not Opened
Sent	Boise Intake Team	Holland & Hart LLP	Yes	4/27/2023 4:41 PM MST
Sent	Diego Rodriguez	Individual	Yes	4/28/2023 11:07 PM MST

Filing Type

Serve

Filing Code

Service Only

Filing Description

Amended Subpoena for Videotaped Deposition Duces Tecum to Aaron Welling

Filing Status

Served

Service Document

File Name	Description	Security	Download
Subpoena DT to Aaron Welling.pdf	Subpoena DT to Aaron Welling.pdf		Original File Court Copy

eService Details

Filing Fee \$0.00
Filing Total: \$0.00

Service Only

Description	Amount
Filing Fee	\$0.00
Filing Total: \$0.00	

Service Only

Description	Amount
Filing Fee	\$0.00
Filing Total: \$0.00	

Service Only

Description	Amount
Filing Fee	\$0.00
Filing Total: \$0.00	

Service Only

Description	Amount
Filing Fee	\$0.00
Filing Total: \$0.00	

Service Only

Description	Amount
Filing Fee	\$0.00
Filing Total: \$0.00	

Service Only

Description	Amount
Filing Fee	\$0.00
Filing Total: \$0.00	

Total Filing Fee \$0.00
Envelope Total: \$0.00

Filing Attorney

Erik Stidham

© 2023 Tyler Technologies

Version: 2022.0.0.9916

Exhibit E

Erik F. Stidham (ISB #5483)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com

Counsel for Plaintiffs

**IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA**

ST. LUKE'S HEALTH SYSTEM, LTD; ST.
LUKE'S REGIONAL MEDICAL CENTER,
LTD; CHRIS ROTH, an individual;
NATASHA D. ERICKSON, MD, an
individual; and TRACY W. JUNGMAN, NP,
an individual,

Plaintiffs,

vs.

AMMON BUNDY, an individual; AMMON
BUNDY FOR GOVERNOR, a political
organization; DIEGO RODRIGUEZ, an
individual; FREEDOM MAN PRESS LLC, a
limited liability company; FREEDOM MAN
PAC, a registered political action committee;
and PEOPLE'S RIGHTS NETWORK, a
political organization,

Defendants.

Case No. CV01-22-06789

**NOTICE OF INTENT TO SERVE
SUBPOENA DUCES TECUM TO
POWER MARKETING AGENCY, LLC**

PLEASE TAKE NOTICE THAT pursuant to Rule 45(c)(2) of the Idaho Rules of Civil Procedure, Plaintiffs, St. Luke's Health System, Ltd, St. Luke's Regional Medical Center, Ltd, Chris Roth, Natasha D. Erickson, MD, and Tracy W. Jungman, NP, by and through their attorneys of record, Holland & Hart LLP, intend to serve a Subpoena duces tecum in the form

**NOTICE OF INTENT TO SERVE SUBPOENA DUCES TECUM TO POWER
MARKETING AGENCY, LLC - 1**

attached hereto as “Exhibit A” on **Power Marketing Agency, LLC**. Plaintiffs intend to serve the Subpoena duces tecum on January 3, 2023 or as soon thereafter as service may be effectuated.

DATED: December 27, 2022.

HOLLAND & HART LLP

By: */s/Erik F. Stidham*

Erik F. Stidham

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of December, 2022, I caused to be filed and served, via iCourt, a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Ammon Bundy for Governor P.O. Box 370 Emmett, ID 83617	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Ammon Bundy for Governor c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

People's Rights Network c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
---	--

People's Rights Network c/o Ammon Bundy P.O. Box 370 Emmett, ID 83617	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Freedom Man Press LLC c/o Diego Rodriguez 1317 Edgewater Dr. #5077 Orlando, FL 32804	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
---	--

Freedom Man Press LLC c/o Diego Rodriguez 9169 W. State St., Ste. 3177 Boise, ID 83714	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
---	--

Freedom Man PAC c/o Diego Rodriguez 1317 Edgewater Dr., #5077 Orlando, FL 32804	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:
freedommanpress@protonmail.com

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

20585463_v1

EXHIBIT A

Erik F. Stidham (ISB #5483)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com

Counsel for Plaintiffs

**IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA**

ST. LUKE'S HEALTH SYSTEM, LTD; ST.
LUKE'S REGIONAL MEDICAL CENTER,
LTD; CHRIS ROTH, an individual;
NATASHA D. ERICKSON, MD, an
individual; and TRACY W. JUNGMAN, NP,
an individual,

Plaintiffs,

vs.

AMMON BUNDY, an individual; AMMON
BUNDY FOR GOVERNOR, a political
organization; DIEGO RODRIGUEZ, an
individual; FREEDOM MAN PRESS LLC, a
limited liability company; FREEDOM MAN
PAC, a registered political action committee;
and PEOPLE'S RIGHTS NETWORK, a
political organization,

Defendants.

Case No. CV01-22-06789

**SUBPOENA DUCES TECUM OF
POWER MARKETING AGENCY, LLC**

STATE OF IDAHO TO: Power Marketing Agency, LLC
Attn: Miranda Chavoya, Registered Agent
9169 W. State St., Ste. 3177
Boise, ID 83714

YOU ARE COMMANDED:

- to appear in the Court at the place, date, and time specified below to testify in the above case.
- to appear at the place, date, and time specified below to testify at the taking of a videotaped deposition in the above case. **See Exhibit A.**

PLACE: Holland & Hart LLP
800 W. Main Street, Suite 1750
Boise, ID 83702

DATE/TIME: February 3, 2023, at 9:30 a.m.

- to produce or permit inspection and copying of the following documents or objects, including electronically stored information, at the place, date, and time specified below. **See Exhibit A.**

PLACE: Holland & Hart LLP
800 W. Main Street, Suite 1750
Boise, ID 83702

DATE/TIME: On or before February 3, 2023, at 9:30 a.m.

- to permit inspection of the following premises at the date and time specified below.

You are further notified that if you fail to appear at the place and time specified above, or to produce or permit copying or inspection as specified above, that you may be held in contempt of court and that the aggrieved party may recover from you the sum of \$100 and all damages which the party may sustain by your failure to comply with this subpoena.

DATED: December ____, 2022.

HOLLAND & HART LLP

By: /s/
Erik F. Stidham
Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this ____ day of December, 2022, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Ammon Bundy for Governor
P.O. Box 370
Emmett, ID 83617

U.S. Mail
 Hand Delivered
 Overnight Mail
 Email/iCourt/eServe:

Ammon Bundy for Governor
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

U.S. Mail
 Hand Delivered
 Overnight Mail
 Email/iCourt/eServe:

Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

U.S. Mail
 Hand Delivered
 Overnight Mail
 Email/iCourt/eServe:

People's Rights Network
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

U.S. Mail
 Hand Delivered
 Overnight Mail
 Email/iCourt/eServe:

People's Rights Network
c/o Ammon Bundy
P.O. Box 370
Emmett, ID 83617

U.S. Mail
 Hand Delivered
 Overnight Mail
 Email/iCourt/eServe:

Freedom Man Press LLC
c/o Diego Rodriguez
1317 Edgewater Dr. #5077
Orlando, FL 32804

U.S. Mail
 Hand Delivered
 Overnight Mail
 Email/iCourt/eServe:

Freedom Man Press LLC
c/o Diego Rodriguez
9169 W. State St., Ste. 3177
Boise, ID 83714

U.S. Mail
 Hand Delivered
 Overnight Mail
 Email/iCourt/eServe:

Freedom Man PAC
c/o Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

U.S. Mail
 Hand Delivered
 Overnight Mail
 Email/iCourt/eServe:

Diego Rodriguez

U.S. Mail

1317 Edgewater Dr., #5077
Orlando, FL 32804

- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:
freedommanpress@protonmail.com

Tucker & Associates Court Reporting

notice@etucker.net

20585401_v1

EXHIBIT A

EXHIBIT A

Power Marketing Agency, LLC

DEFINITIONS AND INSTRUCTIONS

Unless otherwise indicated, the following definitions shall apply to these discovery requests:

A. “You,” “your,” or “yours,” shall mean Power Marketing Agency, LLC, and any person acting or purporting to act on its behalf, including without limitation, all present and former agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

B. “Defendants” shall mean Ammon Bundy; Ammon Bundy for Governor; Diego Rodriguez; Freedom Man Press LLC; Freedom Man PAC; and People’s Rights Network; and any person acting or purporting to act on their behalf, including without limitation, all present and former officers, directors, employees, agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

C. The words “and,” “and/or,” “or” shall each be deemed to refer to both their conjunctive and disjunctive meanings, being construed as necessary to bring within the scope of the discovery request all information and documents which would otherwise be construed as being outside the request.

D. The term “communication” shall mean every manner of transmitting or receiving facts, information, opinions, or thoughts from one person to another person, whether orally, by documents, writing, email, or copy thereof, and to words transmitted by telephone, radio, or any method of voice recording.

E. The term “document” or “documents” shall mean the original, all copies and drafts of papers and writings of every kind, description and form, whether handwritten or typed, and all mechanical, magnetic media and electronic recordings, records and data of every kind, description and form, and all photographs of every kind, and including, without limiting the generality of the foregoing, the following: correspondence, letters, notes, e-mails, computer files, memoranda, reports, notebooks, binders, drawings, studies, analyses, drafts, diaries, calendars, datebooks, appointment books, day-timers, intra- or inter-office communications, canceled checks, minutes, bulletins, circulars, pamphlets, instructions, work assignments, messages (including reports, notes and memoranda of telephone conversations and conferences), telephone statements, calendar and diary entries, desk calendars, appointment books, job or transaction files, books of account, ledgers, bank statements, promissory notes, invoices, charge slips, working papers, graphs, charts, evaluation or appraisal reports, pleadings, transcripts of testimony or other documents filed or prepared in connection with any court or agency or other proceeding, contracts, agreements, assignments, instruments, charges, opinions, official statements, prospectuses, appraisals, feasibility studies, licenses, leases, invoices, computer printouts or programs, summaries, audio, video or sound recordings, cassette tapes, video recorded, electronic or laser recorded, or photographed information. Documents are to be taken

as including all attachments, enclosures and other documents that are attached to, relate to or refer to such documents. Documents are also to include all electronically stored information (“ESI”) made, maintained, retained, stored, or archived by computer or electronic means in any medium, including but not limited to word processing documents, email, email attachments, databases, spreadsheets, writings, drawings, graphs, photographs, sound recordings, images, data, and data compilations. Documents shall also include prior versions of information, as defined above, as well as all attachments, and shall include information stored on personal digital assistants, cell phones, Blackberries, personal laptop computers, hard drives, portable hard drives, and other similar devices.

F. “Person” shall mean any natural person and any other cognizable entity, including but not limited to corporations, proprietorships, partnerships, joint ventures, consortiums, clubs, associations, foundations, governmental agencies or instrumentalities, societies and orders, as well as any agents and employees thereof.

G. The words “relate to” or “relating to” means concerning, referring to, pertaining to, consisting of, containing, describing, involving, comparing, correlating, comparing, mentioning, discussing, evidencing, or having any logical or factual connection with the subject matter dealt with or alluded to the subparagraphs of these Requests.

TOPICS AND DOCUMENTS

Pursuant to Idaho Rule of Civil Procedure 30(b)(6), You are required to designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on Your behalf, regarding the topics described below. The person or persons designated must testify about information known or reasonably available to the organization. The definitions provided above apply to the deposition topics.

Topics:

1. The services You have provided to any Defendant.
2. The services You offer or provide, or have offered or provided, relating to child protective services or so-called medical kidnapping or child trafficking.
3. Revenue you have received from any Defendant or provided to any Defendant.
4. Revenue You have received from, or provided to, Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Consultants LLC, or Freedom Tabernacle, Incorporated.
5. The relationship between You and each of the Defendants.

6. The relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.
7. The events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

Please produce the following documents. The definitions provided above apply to these document requests:

Documents:

1. All documents and communications relating to any service You have provided to any Defendant.
2. All documents and communications relating to any service You offer or provide, or have offered or provided, relating to child protective services or so-called medical kidnapping or child trafficking.
3. All documents and communications reflecting or referring to any payment made by You to any Defendant.
4. All documents and communications reflecting or referring to any payment made to You by any Defendant.
5. All documents and communications reflecting or referring to any payment made by You to Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Consultants LLC, or Freedom Tabernacle, Incorporated.
6. All documents and communications reflecting or referring to any payment made to You by Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Consultants LLC, or Freedom Tabernacle, Incorporated.
7. All documents and communications relating to the relationship between You and each of the Defendants.
8. All documents and communications relating to the relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.
9. All documents or communications relating to the events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

Exhibit F

**IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF
THE STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA**

St. Luke's Health System, Ltd., et al

Plaintiff(s):

DECLARATION OF SERVICE

vs.

Ammon Bundy, et al.

Defendant(s):

Case Number: CV01-22-06789

For:

Holland & Hart, LLP
800 W. Main St., #1750
Boise, ID 83702

Received by Tri-County Process Serving LLC on April 27, 2023 to be served on **POWER MARKETING AGENCY LLC**.

I, Antonio Roque, state that on Friday, April 28, 2023, at 9:38 AM, I served the within named **Power Marketing Agency LLC** by delivering a true copy of the **Amended Subpoena Duces Tecum** to Jamie Burkett, Office Manager for Physicaladdress.com on behalf of Power Marketing Agency LLC. Said service was effected at **9169 W. State St., Ste. 3177, Boise, ID 83714**.

Approximate description of Jamie Burkett

Female 30 years old, 5' 3" Tall, 180 lbs, Blonde Hair, Brown eyes.

I also tendered and paid the sum of **\$22.10**, (Witness Fee Tendered), at the time and place of service.

I hereby acknowledge that I am a Process Server in the county in which service was effected. I am over the age of eighteen years and not a party to the action. I declare under penalty of perjury pursuant to the law of the State of Idaho that the foregoing is true and correct.

Our Reference Number: 202670

Client Reference: Eric F. Stidham

Friday, April 28, 2023

TRI-COUNTY PROCESS SERVING LLC

P.O. Box 1224
Boise, ID, 83701
(208) 344-4132



ANTONIO ROQUE

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of May, 2023, I caused to be filed via iCourt and served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Ammon Bundy for Governor
P.O. Box 370
Emmett, ID 83617

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Ammon Bundy for Governor
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

People's Rights Network
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

People's Rights Network
c/o Ammon Bundy
P.O. Box 370
Emmett, ID 83617

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Freedom Man Press LLC
c/o Diego Rodriguez
1317 Edgewater Dr. #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Freedom Man Press LLC
c/o Diego Rodriguez
9169 W. State St., Ste. 3177
Boise, ID 83714

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Freedom Man PAC
c/o Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:
freedommanpress@protonmail.com

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

Erik F. Stidham (ISB #5483)
Jennifer M. Jensen (ISB #9275)
Zachery J. McCraney (ISB #11552)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com
jmjensen@hollandhart.com
zmccraney@hollandhart.com

Counsel for Plaintiffs

**IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA**

ST. LUKE'S HEALTH SYSTEM, LTD; ST.
LUKE'S REGIONAL MEDICAL CENTER,
LTD; CHRIS ROTH, an individual;
NATASHA D. ERICKSON, MD, an
individual; and TRACY W. JUNGMAN, NP,
an individual,

Plaintiffs,

vs.

AMMON BUNDY, an individual; AMMON
BUNDY FOR GOVERNOR, a political
organization; DIEGO RODRIGUEZ, an
individual; FREEDOM MAN PRESS LLC, a
limited liability company; FREEDOM MAN
PAC, a registered political action committee;
and PEOPLE'S RIGHTS NETWORK, a
political organization,

Defendants.

Case No. CV01-22-06789

**AMENDED SUBPOENA DUCES TECUM
OF POWER MARKETING AGENCY,
LLC**

STATE OF IDAHO TO: Power Marketing Agency, LLC
Attn: Miranda Chavoya, Registered Agent
9169 W. State St., Ste. 3177
Boise, ID 83714

**AMENDED SUBPOENA DUCES TECUM OF POWER MARKETING AGENCY,
LLC - 1**

YOU ARE COMMANDED:

- to appear in the Court at the place, date, and time specified below to testify in the above case.
- to appear at the place, date, and time specified below to testify at the taking of a videotaped deposition in the above case. **See Exhibit A.**

PLACE: Holland & Hart LLP
800 W. Main Street, Suite 1750
Boise, ID 83702

DATE/TIME: May 23, 2023, from 1:00 p.m. to 5:00 p.m.

- to produce or permit inspection and copying of the following documents or objects, including electronically stored information, at the place, date, and time specified below. **See Exhibit A.**

PLACE: Holland & Hart LLP
800 W. Main Street, Suite 1750
Boise, ID 83702

DATE/TIME: On or before May 23, 2023, at 1:00 p.m.

- to permit inspection of the following premises at the date and time specified below.

You are further notified that if you fail to appear at the place and time specified above, or to produce or permit copying or inspection as specified above, that you may be held in contempt of court and that the aggrieved party may recover from you the sum of \$100 and all damages which the party may sustain by your failure to comply with this subpoena.

DATED: April 27, 2023.

HOLLAND & HART LLP

By: /s/ Erik F. Stidham

Erik F. Stidham

Erik F. Stidham

Jennifer M. Jensen

Zachery J. McCraney

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of April, 2023, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Ammon Bundy for Governor P.O. Box 370 Emmett, ID 83617	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Ammon Bundy for Governor c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

People's Rights Network c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
---	--

People's Rights Network c/o Ammon Bundy P.O. Box 370 Emmett, ID 83617	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Freedom Man Press LLC c/o Diego Rodriguez 1317 Edgewater Dr. #5077 Orlando, FL 32804	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
---	--

Freedom Man Press LLC c/o Diego Rodriguez 9169 W. State St., Ste. 3177 Boise, ID 83714	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
---	--

Freedom Man PAC c/o Diego Rodriguez 1317 Edgewater Dr., #5077 Orlando, FL 32804	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:
freedommanpress@protonmail.com

Tucker & Associates Court Reporting

notice@etucker.net

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

21375586_v1

EXHIBIT A

Power Marketing Agency, LLC

DEFINITIONS AND INSTRUCTIONS

Unless otherwise indicated, the following definitions shall apply to these discovery requests:

A. “You,” “your,” or “yours,” shall mean Power Marketing Agency, LLC, and any person acting or purporting to act on its behalf, including without limitation, all present and former agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

B. “Defendants” shall mean Ammon Bundy; Ammon Bundy for Governor; Diego Rodriguez; Freedom Man Press LLC; Freedom Man PAC; and People’s Rights Network; and any person acting or purporting to act on their behalf, including without limitation, all present and former officers, directors, employees, agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

C. The words “and,” “and/or,” “or” shall each be deemed to refer to both their conjunctive and disjunctive meanings, being construed as necessary to bring within the scope of the discovery request all information and documents which would otherwise be construed as being outside the request.

D. The term “communication” shall mean every manner of transmitting or receiving facts, information, opinions, or thoughts from one person to another person, whether orally, by documents, writing, email, or copy thereof, and to words transmitted by telephone, radio, or any method of voice recording.

E. The term “document” or “documents” shall mean the original, all copies and drafts of papers and writings of every kind, description and form, whether handwritten or typed, and all mechanical, magnetic media and electronic recordings, records and data of every kind, description and form, and all photographs of every kind, and including, without limiting the generality of the foregoing, the following: correspondence, letters, notes, e-mails, computer files, memoranda, reports, notebooks, binders, drawings, studies, analyses, drafts, diaries, calendars, datebooks, appointment books, day-timers, intra- or inter-office communications, canceled checks, minutes, bulletins, circulars, pamphlets, instructions, work assignments, messages (including reports, notes and memoranda of telephone conversations and conferences), telephone statements, calendar and diary entries, desk calendars, appointment books, job or transaction files, books of account, ledgers, bank statements, promissory notes, invoices, charge slips, working papers, graphs, charts, evaluation or appraisal reports, pleadings, transcripts of testimony or other documents filed or prepared in connection with any court or agency or other proceeding, contracts, agreements, assignments, instruments, charges, opinions, official statements, prospectuses, appraisals, feasibility studies, licenses, leases, invoices, computer printouts or programs, summaries, audio, video or sound recordings, cassette tapes, video recorded, electronic or laser recorded, or photographed information. Documents are to be taken

as including all attachments, enclosures and other documents that are attached to, relate to or refer to such documents. Documents are also to include all electronically stored information (“ESI”) made, maintained, retained, stored, or archived by computer or electronic means in any medium, including but not limited to word processing documents, email, email attachments, databases, spreadsheets, writings, drawings, graphs, photographs, sound recordings, images, data, and data compilations. Documents shall also include prior versions of information, as defined above, as well as all attachments, and shall include information stored on personal digital assistants, cell phones, Blackberries, personal laptop computers, hard drives, portable hard drives, and other similar devices.

F. “Person” shall mean any natural person and any other cognizable entity, including but not limited to corporations, proprietorships, partnerships, joint ventures, consortiums, clubs, associations, foundations, governmental agencies or instrumentalities, societies and orders, as well as any agents and employees thereof.

G. The words “relate to” or “relating to” means concerning, referring to, pertaining to, consisting of, containing, describing, involving, comparing, correlating, comparing, mentioning, discussing, evidencing, or having any logical or factual connection with the subject matter dealt with or alluded to the subparagraphs of these Requests.

TOPICS AND DOCUMENTS

Pursuant to Idaho Rule of Civil Procedure 30(b)(6), You are required to designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on Your behalf, regarding the topics described below. The person or persons designated must testify about information known or reasonably available to the organization. The definitions provided above apply to the deposition topics.

Topics:

1. The services You have provided to any Defendant.
2. The services You offer or provide, or have offered or provided, relating to child protective services or so-called medical kidnapping or child trafficking.
3. Revenue you have received from any Defendant or provided to any Defendant.
4. Revenue You have received from, or provided to, Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Consultants LLC, or Freedom Tabernacle, Incorporated.
5. The relationship between You and each of the Defendants.

6. The relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.
7. The events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

Please produce the following documents. The definitions provided above apply to these document requests:

Documents:

1. All documents and communications relating to any service You have provided to any Defendant.
2. All documents and communications relating to any service You offer or provide, or have offered or provided, relating to child protective services or so-called medical kidnapping or child trafficking.
3. All documents and communications reflecting or referring to any payment made by You to any Defendant.
4. All documents and communications reflecting or referring to any payment made to You by any Defendant.
5. All documents and communications reflecting or referring to any payment made by You to Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Consultants LLC, or Freedom Tabernacle, Incorporated.
6. All documents and communications reflecting or referring to any payment made to You by Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Consultants LLC, or Freedom Tabernacle, Incorporated.
7. All documents and communications relating to the relationship between You and each of the Defendants.
8. All documents and communications relating to the relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.
9. All documents or communications relating to the events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

Case # CV01-22-06789 - St Lukes Health System LTD, St Lukes Reg

Envelope Information

Envelope Id
6055028

Submitted Date
4/27/2023 3:27 PM MST

Submitted User Name
cmcarvalho@hollandhart.com

Case Information

Location
Ada County District Court

Category
Civil

Case Type
AA - All Initial District Court Filings (Not Listed In: E, F, and H1)

Case Initiation Date
5/11/2022

Case #
CV01-22-06789

Assigned to Judge
Norton, Lynn G.

Filings

Filing Type
Serve

Filing Code
Service Only


Filing Description
Subpoena Duces Tecum to Ada County
Prosecutor's Office

Filing Status
Served

Service Document

File Name	Description	Security	Download
Subpoena DT to Ada Co Prosecutor's Office.pdf	Subpoena DT to Ada Co Prosecutor's Office.pdf		Original File Court Copy

eService Details

Status	Name	Firm	Served	Date Opened
Sent	Diego Rodriguez	Individual	Yes	4/28/2023 11:08 PM MST
 Support	ntake Team	Holland & Hart LLP	Yes	4/27/2023 4:38 PM MST

Status	Name	Firm	Served	Date Opened
Sent	Erik Stidham	Holland & Hart LLP	Yes	Not Opened
Sent	Jennifer Jensen	Holland & Hart LLP	Yes	Not Opened
Sent	Zack McCraney	Holland & Hart LLP	Yes	Not Opened

Filing Type

Serve

Filing Code

Service Only

Filing Description

Second Amended Notice of Videotaped
Deposition of Diego Rodriguez

Filing Status

Served

Service Document

File Name	Description	Security	Download
Second Amended Notice of Deposition of Diego Rodriguez.pdf	Second Amended Notice of Deposition of Diego Rodriguez.pdf		Original File Court Copy

eService Details

Status	Name	Firm	Served	Date Opened
Sent	Boise Intake Team	Holland & Hart LLP	Yes	4/27/2023 4:39 PM MST
Sent	Erik Stidham	Holland & Hart LLP	Yes	Not Opened
Sent	Jennifer Jensen	Holland & Hart LLP	Yes	Not Opened
Sent	Zack McCraney	Holland & Hart LLP	Yes	Not Opened
Sent	Diego Rodriguez	Individual	Yes	4/28/2023 11:07 PM MST

Filing Type

Serve

Filing Code

Service Only

Filing Description

Notice of Videotaped Deposition of
Ammon Bundy

Filing Status

Served

Service Document

File Name	Description	Security	Download
Notice of Videotaped Deposition of Ammon Bundy.pdf	Notice of Videotaped Deposition of Ammon Bundy.pdf		Original File Court Copy

eService Details

Status	Name	Firm	Served	Date Opened
Sent	Jennifer Jensen	Holland & Hart LLP	Yes	Not Opened
Sent	Zack McCraney	Holland & Hart LLP	Yes	Not Opened
Sent	Erik Stidham	Holland & Hart LLP	Yes	Not Opened
Sent	Boise Intake Team	Holland & Hart LLP	Yes	4/27/2023 4:39 PM MST
Sent	Diego Rodriguez	Individual	Yes	4/28/2023 11:07 PM MST

Filing Type

Serve

Filing Code

Service Only

Filing Description

Notice of Videotaped Deposition of People's Rights Network Pursuant to I.R.C.P. 30(b)(6)

Filing Status

Served

Service Document

File Name	Description	Security	Download
Notice of Videotaped Deposition of People's Rights Network 30(b)(6).pdf	Notice of Videotaped Deposition of People's Rights Network 30(b)(6).pdf		Original File Court Copy

eService Details

Status	Name	Firm	Served	Date Opened
Sent	Zack McCraney	Holland & Hart LLP	Yes	Not Opened
Sent	Jennifer Jensen	Holland & Hart LLP	Yes	Not Opened
Sent	Erik Stidham	Holland & Hart LLP	Yes	Not Opened
Sent	Boise Intake Team	Holland & Hart LLP	Yes	4/27/2023 4:40 PM MST
Sent	Diego Rodriguez	Individual	Yes	4/28/2023 11:07 PM MST

Filing Type

Serve

Filing Code

Service Only

Filing Description

Notice of Videotaped Deposition of Ammon Bundy for Governor Pursuant to I.R.C.P. 30(b)(6)

Filing Status

Served

Service Document

File Name	Description	Security	Download
Notice of Videotaped Deposition of Ammon Bundy for Governor 30(b)(6).pdf	Notice of Videotaped Deposition of Ammon Bundy for Governor 30(b)(6).pdf		Original File Court Copy

eService Details

Status	Name	Firm	Served	Date Opened
Sent	Zack McCraney	Holland & Hart LLP	Yes	Not Opened
Sent	Jennifer Jensen	Holland & Hart LLP	Yes	Not Opened
Sent	Erik Stidham	Holland & Hart LLP	Yes	Not Opened
Sent	Boise Intake Team	Holland & Hart LLP	Yes	4/27/2023 4:41 PM MST
Sent	Diego Rodriguez	Individual	Yes	4/28/2023 11:07 PM MST

Filing Type

Serve

Filing Code

Service Only

Filing Description

Amended Subpoena Duces Tecum of Power Marketing Agency, LLC

Filing Status

Served

Service Document

File Name	Description	Security	Download
Amended Subpoena DT to Power Marketing Agency.pdf	Amended Subpoena DT to Power Marketing Agency.pdf		Original File Court Copy

eService Details

Status	Name	Firm	Served	Date Opened
Sent	Zack McCraney	Holland & Hart LLP	Yes	Not Opened
Sent	Jennifer Jensen	Holland & Hart LLP	Yes	Not Opened
Sent	Erik Stidham	Holland & Hart LLP	Yes	Not Opened
Sent	Boise Intake Team	Holland & Hart LLP	Yes	4/27/2023 4:41 PM MST
Sent	Diego Rodriguez	Individual	Yes	4/28/2023 11:07 PM MST

Filing Type

Serve

Filing Code

Service Only

Filing Description

Amended Subpoena for Videotaped Deposition Duces Tecum to Aaron Welling

Filing Status

Served

Service Document

File Name	Description	Security	Download
Subpoena DT to Aaron Welling.pdf	Subpoena DT to Aaron Welling.pdf		Original File Court Copy

eService Details

Status	Name	Firm	Served	Date Opened
Sent	Zack McCraney	Holland & Hart LLP	Yes	Not Opened
Sent	Jennifer Jensen	Holland & Hart LLP	Yes	Not Opened
Sent	Erik Stidham	Holland & Hart LLP	Yes	Not Opened
Sent	Boise Intake Team	Holland & Hart LLP	Yes	4/27/2023 4:42 PM MST
Sent	Diego Rodriguez	Individual	Yes	4/28/2023 11:07 PM MST

Parties with No eService

Name Chris Roth
Address

Name Natasha D Erickson
Address

Name Ammon Bundy
Address

Name Ammon Bundy for Governor
Address

Name Freedom Man PAC
Address

Name Peoples Rights Network
Address

Name Freedom Man Press LLC
Address

Name St Lukes Health System LTD
Address

Name Tracy W Jungman
Address

Name Ada County Prosecutors Office
Address

Name Kyle Bringhurst
Address

Fees

Service Only

Description	Amount
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Filing Fee \$0.00
Filing Total: \$0.00

Service Only

Description	Amount
Filing Fee	\$0.00
Filing Total: \$0.00	

Service Only

Description	Amount
Filing Fee	\$0.00
Filing Total: \$0.00	

Service Only

Description	Amount
Filing Fee	\$0.00
Filing Total: \$0.00	

Service Only

Description	Amount
Filing Fee	\$0.00
Filing Total: \$0.00	

Service Only

Description	Amount
Filing Fee	\$0.00
Filing Total: \$0.00	

Service Only

Description	Amount
Filing Fee	\$0.00
Filing Total: \$0.00	

Total Filing Fee \$0.00
Envelope Total: \$0.00

Filing Attorney

Erik Stidham

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Version: 2022.0.0.9916

Exhibit G

Erik F. Stidham (ISB #5483)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com

Counsel for Plaintiffs

**IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA**

ST. LUKE'S HEALTH SYSTEM, LTD; ST.
LUKE'S REGIONAL MEDICAL CENTER,
LTD; CHRIS ROTH, an individual;
NATASHA D. ERICKSON, MD, an
individual; and TRACY W. JUNGMAN, NP,
an individual,

Plaintiffs,

vs.

AMMON BUNDY, an individual; AMMON
BUNDY FOR GOVERNOR, a political
organization; DIEGO RODRIGUEZ, an
individual; FREEDOM MAN PRESS LLC, a
limited liability company; FREEDOM MAN
PAC, a registered political action committee;
and PEOPLE'S RIGHTS NETWORK, a
political organization,

Defendants.

Case No. CV01-22-06789

**NOTICE OF INTENT TO SERVE
SUBPOENA DUCES TECUM TO
POWER MARKETING CONSULTANTS
LLC**

PLEASE TAKE NOTICE THAT pursuant to Rule 45(c)(2) of the Idaho Rules of Civil Procedure, Plaintiffs, St. Luke's Health System, Ltd, St. Luke's Regional Medical Center, Ltd, Chris Roth, Natasha D. Erickson, MD, and Tracy W. Jungman, NP, by and through their attorneys of record, Holland & Hart LLP, intend to serve a Subpoena duces tecum in the form

**NOTICE OF INTENT TO SERVE SUBPOENA DUCES TECUM TO POWER
MARKETING CONSULTANTS LLC - 1**

attached hereto as “Exhibit A” on **Power Marketing Consultants LLC**. Plaintiffs intend to serve the Subpoena duces tecum on January 3, 2023, or as soon thereafter as service may be effectuated.

DATED: December 27, 2022.

HOLLAND & HART LLP

By: */s/Erik F. Stidham*

Erik F. Stidham

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of December, 2022, I caused to be filed and served, via iCourt, a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Ammon Bundy for Governor P.O. Box 370 Emmett, ID 83617	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Ammon Bundy for Governor c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

People's Rights Network c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
---	--

People's Rights Network c/o Ammon Bundy P.O. Box 370 Emmett, ID 83617	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Freedom Man Press LLC c/o Diego Rodriguez 1317 Edgewater Dr. #5077 Orlando, FL 32804	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
---	--

Freedom Man Press LLC c/o Diego Rodriguez 9169 W. State St., Ste. 3177 Boise, ID 83714	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
---	--

Freedom Man PAC c/o Diego Rodriguez 1317 Edgewater Dr., #5077 Orlando, FL 32804	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:
freedommanpress@protonmail.com

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

20585991_v1

EXHIBIT A

Erik F. Stidham (ISB #5483)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com

Counsel for Plaintiffs

**IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA**

ST. LUKE'S HEALTH SYSTEM, LTD; ST.
LUKE'S REGIONAL MEDICAL CENTER,
LTD; CHRIS ROTH, an individual;
NATASHA D. ERICKSON, MD, an
individual; and TRACY W. JUNGMAN, NP,
an individual,

Plaintiffs,

vs.

AMMON BUNDY, an individual; AMMON
BUNDY FOR GOVERNOR, a political
organization; DIEGO RODRIGUEZ, an
individual; FREEDOM MAN PRESS LLC, a
limited liability company; FREEDOM MAN
PAC, a registered political action committee;
and PEOPLE'S RIGHTS NETWORK, a
political organization,

Defendants.

Case No. CV01-22-06789

**SUBPOENA DUCES TECUM OF
POWER MARKETING CONSULTANTS
LLC**

STATE OF IDAHO TO: Power Marketing Consultants LLC
Attn: Diego Rodriguez, Registered Agent
1876 E. Adelaide Dr.
Meridian, ID 83642

**SUBPOENA DUCES TECUM OF
POWER MARKETING CONSULTANTS LLC - 1**

YOU ARE COMMANDED:

- to appear in the Court at the place, date, and time specified below to testify in the above case.
- to appear at the place, date, and time specified below to testify at the taking of a videotaped deposition in the above case. **See Exhibit A.**

PLACE: Holland & Hart LLP
800 W. Main Street, Suite 1750
Boise, ID 83702

DATE/TIME: February 3, 2023, at 1:30 p.m.

- to produce or permit inspection and copying of the following documents or objects, including electronically stored information, at the place, date, and time specified below. **See Exhibit A.**

PLACE: Holland & Hart LLP
800 W. Main Street, Suite 1750
Boise, ID 83702

DATE/TIME: On or before February 3, 2023, at 1:30 p.m.

- to permit inspection of the following premises at the date and time specified below.

You are further notified that if you fail to appear at the place and time specified above, or to produce or permit copying or inspection as specified above, that you may be held in contempt of court and that the aggrieved party may recover from you the sum of \$100 and all damages which the party may sustain by your failure to comply with this subpoena.

DATED: December ____, 2022.

HOLLAND & HART LLP

By: /s/
Erik F. Stidham
Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this ____ day of December, 2022, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Ammon Bundy for Governor P.O. Box 370 Emmett, ID 83617	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Ammon Bundy for Governor c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

People's Rights Network c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
---	--

People's Rights Network c/o Ammon Bundy P.O. Box 370 Emmett, ID 83617	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Freedom Man Press LLC c/o Diego Rodriguez 1317 Edgewater Dr. #5077 Orlando, FL 32804	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
---	--

Freedom Man Press LLC c/o Diego Rodriguez 9169 W. State St., Ste. 3177 Boise, ID 83714	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
---	--

Freedom Man PAC c/o Diego Rodriguez 1317 Edgewater Dr., #5077 Orlando, FL 32804	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Diego Rodriguez	<input type="checkbox"/> U.S. Mail
-----------------	------------------------------------

1317 Edgewater Dr., #5077
Orlando, FL 32804

- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:
freedommanpress@protonmail.com

Tucker & Associates Court Reporting

notice@etucker.net

/s/

Erik F. Stidham
OF HOLLAND & HART LLP

20586009_v1

EXHIBIT A

EXHIBIT A

Power Marketing Consultants LLC

DEFINITIONS AND INSTRUCTIONS

Unless otherwise indicated, the following definitions shall apply to these discovery requests:

A. “You,” “your,” or “yours,” shall mean Power Marketing Consultants LLC, and any person acting or purporting to act on its behalf, including without limitation, all present and former agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

B. “Defendants” shall mean Ammon Bundy; Ammon Bundy for Governor; Diego Rodriguez; Freedom Man Press LLC; Freedom Man PAC; and People’s Rights Network; and any person acting or purporting to act on their behalf, including without limitation, all present and former officers, directors, employees, agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

C. The words “and,” “and/or,” “or” shall each be deemed to refer to both their conjunctive and disjunctive meanings, being construed as necessary to bring within the scope of the discovery request all information and documents which would otherwise be construed as being outside the request.

D. The term “communication” shall mean every manner of transmitting or receiving facts, information, opinions, or thoughts from one person to another person, whether orally, by documents, writing, email, or copy thereof, and to words transmitted by telephone, radio, or any method of voice recording.

E. The term “document” or “documents” shall mean the original, all copies and drafts of papers and writings of every kind, description and form, whether handwritten or typed, and all mechanical, magnetic media and electronic recordings, records and data of every kind, description and form, and all photographs of every kind, and including, without limiting the generality of the foregoing, the following: correspondence, letters, notes, e-mails, computer files, memoranda, reports, notebooks, binders, drawings, studies, analyses, drafts, diaries, calendars, datebooks, appointment books, day-timers, intra- or inter-office communications, canceled checks, minutes, bulletins, circulars, pamphlets, instructions, work assignments, messages (including reports, notes and memoranda of telephone conversations and conferences), telephone statements, calendar and diary entries, desk calendars, appointment books, job or transaction files, books of account, ledgers, bank statements, promissory notes, invoices, charge slips, working papers, graphs, charts, evaluation or appraisal reports, pleadings, transcripts of testimony or other documents filed or prepared in connection with any court or agency or other proceeding, contracts, agreements, assignments, instruments, charges, opinions, official statements, prospectuses, appraisals, feasibility studies, licenses, leases, invoices, computer printouts or programs, summaries, audio, video or sound recordings, cassette tapes, video recorded, electronic or laser recorded, or photographed information. Documents are to be taken

as including all attachments, enclosures and other documents that are attached to, relate to or refer to such documents. Documents are also to include all electronically stored information (“ESI”) made, maintained, retained, stored, or archived by computer or electronic means in any medium, including but not limited to word processing documents, email, email attachments, databases, spreadsheets, writings, drawings, graphs, photographs, sound recordings, images, data, and data compilations. Documents shall also include prior versions of information, as defined above, as well as all attachments, and shall include information stored on personal digital assistants, cell phones, Blackberries, personal laptop computers, hard drives, portable hard drives, and other similar devices.

F. “Person” shall mean any natural person and any other cognizable entity, including but not limited to corporations, proprietorships, partnerships, joint ventures, consortiums, clubs, associations, foundations, governmental agencies or instrumentalities, societies and orders, as well as any agents and employees thereof.

G. The words “relate to” or “relating to” means concerning, referring to, pertaining to, consisting of, containing, describing, involving, comparing, correlating, comparing, mentioning, discussing, evidencing, or having any logical or factual connection with the subject matter dealt with or alluded to the subparagraphs of these Requests.

Pursuant to Idaho Rule of Civil Procedure 30(b)(6), You are required to designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on Your behalf, regarding the topics described below. The person or persons designated must testify about information known or reasonably available to the organization. The definitions provided above apply to the deposition topics.

Topics:

1. The services You have provided to any Defendant.
2. The services You offer or provide, or have offered or provided, relating to child protective services or so-called medical kidnapping or child trafficking.
3. Revenue you have received from any Defendant or provided to any Defendant.
4. Revenue You have received from, or provided to, Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Freedom Tabernacle, Incorporated.
5. The relationship between You and each of the Defendants.
6. The relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.

7. The events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

Please produce the following documents. The definitions provided above apply to these document requests:

Documents:

1. All documents and communications relating to any service You have provided to any Defendant.
2. All documents and communications relating to any service You offer or provide, or have offered or provided, relating to child protective services or so-called medical kidnapping or child trafficking.
3. All documents and communications reflecting or referring to any payment made by You to any Defendant.
4. All documents and communications reflecting or referring to any payment made to You by any Defendant.
5. All documents and communications reflecting or referring to any payment made by You to Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Freedom Tabernacle, Incorporated.
6. All documents and communications reflecting or referring to any payment made to You by Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Freedom Tabernacle, Incorporated.
7. All documents and communications relating to the relationship between You and each of the Defendants.
8. All documents and communications relating to the relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.
9. All documents or communications relating to the events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

Exhibit H

Erik F. Stidham (ISB #5483)
Jennifer M. Jensen (ISB #9275)
Zachery J. McCraney (ISB #11552)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com
jmjensen@hollandhart.com
zmccraney@hollandhart.com

Counsel for Plaintiffs

**IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA**

ST. LUKE'S HEALTH SYSTEM, LTD; ST.
LUKE'S REGIONAL MEDICAL CENTER,
LTD; CHRIS ROTH, an individual;
NATASHA D. ERICKSON, MD, an
individual; and TRACY W. JUNGMAN, NP,
an individual,

Plaintiffs,

vs.

AMMON BUNDY, an individual; AMMON
BUNDY FOR GOVERNOR, a political
organization; DIEGO RODRIGUEZ, an
individual; FREEDOM MAN PRESS LLC, a
limited liability company; FREEDOM MAN
PAC, a registered political action committee;
and PEOPLE'S RIGHTS NETWORK, a
political organization and an unincorporated
association,

Defendants.

Case No. CV01-22-06789

**RETURN OF SERVICE – POWER
MARKETING CONSULTANTS, LLC**

VERIFIED RETURN OF SERVICE

State of Florida

County of Orange

Circuit Court

Case Number: 2023-CA-11922 Court Date: 5/23/2023 9:00 am

Plaintiff: **ST. LUKE'S HEALTH SYSTEM, LTD; ST LUKE'S REGIONAL MEDICAL CENTER, LTD; CHRIS ROTH, AN INDIVIDUAL; NATASHA D. ERICKSON, MD, AN INDIVIDUAL; AND TRACY W. JUNGMAN, NP, AN INDIVIDUAL,**

vs.

Defendant: **AMMON BUNDY, AN INDIVIDUAL; AMMON BUNDY FOR GOVERNOR, A POLITICAL ORGANIZATION; DIEGO RODRIGUEZ, AN INDIVIDUAL; FREEDOM MAN PRESS LLC, A LIMITED LIABILITY COMPANY; FREEDOM MAN PAC, A REGISTERED POLITICAL ACTION COMMITTEE; AND PEOPLE'S RIGHTS NETWORK, A POLITICAL ORGANIZATION,**

For:

Erik F. Stidham
Holland & Hart LLP
800 W. Main Street
Suite 1750
Boise, ID 83702-5974

Received by Magic Process on the 5th day of May, 2023 at 2:01 pm to be served on **POWER MARKETING CONSULTANTS, LLC, 1317 EDGEWATER DR, #5077, ORLANDO, FL 32804**

I, Edwin Young, do hereby affirm that on the **5th day of May, 2023 at 4:21 pm, I:**

served a **LIMITED LIABILITY COMPANY** by delivering a true copy of the **SUBPOENA FOR VIDEOTAPED DEPOSITION DUCES TECUM, EXHIBIT A, CERTIFICATE OF SERVICE, NOTICE OF TAKING VIDEOTAPED DEPOSITION DUCES TECUM OF NON-PARTY WITNESS IN OUT-OF-STATE CASE, CERTIFICATE OF SERVICE, EXHIBIT A** with the date and hour of service endorsed thereon by me, to: **AMELIA NELSON** as **FRONT DESK** for **POWER MARKETING CONSULTANTS, LLC**, at the address of: **1317 EDGEWATER DR, #5077, ORLANDO, FL 32804**, and informed said person of the contents therein, in compliance with state statutes.

Description of Person Served: Age: 24, Sex: F, Race/Skin Color: Black, Height: 5'6", Weight: 190, Hair: Black, Glasses: Y

I certify that I am over the age of 18, have no interest in the above action, and am a Certified Process Server, in good standing, in the judicial circuit in which the process was served. Under Penalty of Perjury, I declare that I have read the foregoing document and that the facts stated in it are true to the best of my knowledge. Notary not required pursuant to Florida Statute 92.525 verification of documents.



Edwin Young
0178

Magic Process
924 N. Magnolia Ave.
Suite 220
Orlando, FL 32803
(407) 541-0697

Our Job Serial Number: MGP-2023007312



CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of May, 2023, I caused to be filed via iCourt and served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Ammon Bundy for Governor
P.O. Box 370
Emmett, ID 83617

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Ammon Bundy for Governor
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

People's Rights Network
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

People's Rights Network
c/o Ammon Bundy
P.O. Box 370
Emmett, ID 83617

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Freedom Man Press LLC
c/o Diego Rodriguez
1317 Edgewater Dr. #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Freedom Man Press LLC
c/o Diego Rodriguez
9169 W. State St., Ste. 3177
Boise, ID 83714

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Freedom Man PAC
c/o Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:
freedommanpress@protonmail.com

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

Erik F. Stidham (ISB #5483)
Jennifer M. Jensen (ISB #9275)
Zachery J. McCraney (ISB #11552)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com
jmjensen@hollandhart.com
zmccraney@hollandhart.com

Counsel for Plaintiffs

**IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA**

<p>ST. LUKE'S HEALTH SYSTEM, LTD; ST. LUKE'S REGIONAL MEDICAL CENTER, LTD; CHRIS ROTH, an individual; NATASHA D. ERICKSON, MD, an individual; and TRACY W. JUNGMAN, NP, an individual,</p> <p style="text-align: center;">Plaintiffs,</p> <p>vs.</p> <p>AMMON BUNDY, an individual; AMMON BUNDY FOR GOVERNOR, a political organization; DIEGO RODRIGUEZ, an individual; FREEDOM MAN PRESS LLC, a limited liability company; FREEDOM MAN PAC, a registered political action committee; and PEOPLE'S RIGHTS NETWORK, a political organization,</p> <p>Defendants.</p>	<p>Case No. CV01-22-06789</p> <p>AMENDED SUBPOENA FOR DEPOSITION DUCES TECUM OF POWER MARKETING CONSULTANTS LLC</p>
---	--

STATE OF IDAHO TO: Power Marketing Consultants LLC
Attn: Diego Rodriguez, Registered Agent
1317 Edgewater Dr., #5077
Orlando, FL 32804

Power Marketing Consultants LLC
Attn: Diego Rodriguez, Registered Agent
Email: freedommanpress@protonmail.com

YOU ARE COMMANDED:

- to appear in the Court at the place, date, and time specified below to testify in the above case.
- to appear at the place, date, and time specified below to testify at the taking of a videotaped deposition in the above case. **See Exhibit A.**

PLACE: Holland & Hart LLP
800 W. Main Street, Suite 1750
Boise, ID 83702

DATE/TIME: May 23, 2023, from 9:00 a.m. to noon

- to produce or permit inspection and copying of the following documents or objects, including electronically stored information, at the place, date, and time specified below. **See Exhibit A.**

PLACE: Holland & Hart LLP
800 W. Main Street, Suite 1750
Boise, ID 83702

DATE/TIME: On or before May 23, 2023, at 9:00 a.m.

- to permit inspection of the following premises at the date and time specified below.

You are further notified that if you fail to appear at the place and time specified above, or to produce or permit copying or inspection as specified above, that you may be held in contempt of court and that the aggrieved party may recover from you the sum of \$100 and all damages which the party may sustain by your failure to comply with this subpoena.

DATED: May 5, 2023.

HOLLAND & HART LLP

By: /s/Erik F. Stidham

Erik F. Stidham

Jennifer M. Jensen

Zachery J. McCraney

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of May, 2023, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Ammon Bundy for Governor P.O. Box 370 Emmett, ID 83617	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Ammon Bundy for Governor c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

People's Rights Network c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
---	--

People's Rights Network c/o Ammon Bundy P.O. Box 370 Emmett, ID 83617	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Freedom Man Press LLC c/o Diego Rodriguez 1317 Edgewater Dr. #5077 Orlando, FL 32804	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
---	--

Freedom Man Press LLC c/o Diego Rodriguez 9169 W. State St., Ste. 3177 Boise, ID 83714	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
---	--

Freedom Man PAC c/o Diego Rodriguez 1317 Edgewater Dr., #5077 Orlando, FL 32804	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

- U.S. Mail
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- Overnight Mail
- Email/iCourt/eServe:
freedommanpress@protonmail.com

Tucker & Associates Court Reporting

notice@etucker.net

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

21375507_v1

EXHIBIT A

Power Marketing Consultants LLC

DEFINITIONS AND INSTRUCTIONS

Unless otherwise indicated, the following definitions shall apply to these discovery requests:

“You,” “your,” or “yours,” shall mean Power Marketing Consultants LLC, and any person acting or purporting to act on its behalf, including without limitation, all present and former agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

“Defendants” shall mean Ammon Bundy; Ammon Bundy for Governor; Diego Rodriguez; Freedom Man Press LLC; Freedom Man PAC; and People’s Rights Network; and any person acting or purporting to act on their behalf, including without limitation, all present and former officers, directors, employees, agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

The words “and,” “and/or,” “or” shall each be deemed to refer to both their conjunctive and disjunctive meanings, being construed as necessary to bring within the scope of the discovery request all information and documents which would otherwise be construed as being outside the request.

The term “communication” shall mean every manner of transmitting or receiving facts, information, opinions, or thoughts from one person to another person, whether orally, by documents, writing, email, or copy thereof, and to words transmitted by telephone, radio, or any method of voice recording.

The term “document” or “documents” shall mean the original, all copies and drafts of papers and writings of every kind, description and form, whether handwritten or typed, and all mechanical, magnetic media and electronic recordings, records and data of every kind, description and form, and all photographs of every kind, and including, without limiting the generality of the foregoing, the following: correspondence, letters, notes, e-mails, computer files, memoranda, reports, notebooks, binders, drawings, studies, analyses, drafts, diaries, calendars, datebooks, appointment books, day-timers, intra- or inter-office communications, canceled checks, minutes, bulletins, circulars, pamphlets, instructions, work assignments, messages (including reports, notes and memoranda of telephone conversations and conferences), telephone statements, calendar and diary entries, desk calendars, appointment books, job or transaction files, books of account, ledgers, bank statements, promissory notes, invoices, charge slips, working papers, graphs, charts, evaluation or appraisal reports, pleadings, transcripts of testimony or other documents filed or prepared in connection with any court or agency or other proceeding, contracts, agreements, assignments, instruments, charges, opinions, official statements, prospectuses, appraisals, feasibility studies, licenses, leases, invoices, computer printouts or programs, summaries, audio, video or sound recordings, cassette tapes, video recorded, electronic or laser recorded, or photographed information. Documents are to be taken as including all attachments, enclosures and other documents that are attached to, relate to or

refer to such documents. Documents are also to include all electronically stored information (“ESI”) made, maintained, retained, stored, or archived by computer or electronic means in any medium, including but not limited to word processing documents, email, email attachments, databases, spreadsheets, writings, drawings, graphs, photographs, sound recordings, images, data, and data compilations. Documents shall also include prior versions of information, as defined above, as well as all attachments, and shall include information stored on personal digital assistants, cell phones, Blackberries, personal laptop computers, hard drives, portable hard drives, and other similar devices.

“Person” shall mean any natural person and any other cognizable entity, including but not limited to corporations, proprietorships, partnerships, joint ventures, consortiums, clubs, associations, foundations, governmental agencies or instrumentalities, societies and orders, as well as any agents and employees thereof.

The words “relate to” or “relating to” means concerning, referring to, pertaining to, consisting of, containing, describing, involving, comparing, correlating, comparing, mentioning, discussing, evidencing, or having any logical or factual connection with the subject matter dealt with or alluded to the subparagraphs of these Requests.

Pursuant to Idaho Rule of Civil Procedure 30(b)(6), You are required to designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on Your behalf, regarding the topics described below. The person or persons designated must testify about information known or reasonably available to the organization. The definitions provided above apply to the deposition topics.

Topics:

1. The services You have provided to any Defendant.
2. The services You offer or provide, or have offered or provided, relating to child protective services or so-called medical kidnapping or child trafficking.
3. Revenue you have received from any Defendant or provided to any Defendant.
4. Revenue You have received from, or provided to, Abish-husbondi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Freedom Tabernacle, Incorporated.
5. The relationship between You and each of the Defendants.
6. The relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.
7. The events surrounding the Idaho Department of Health and Welfare’s intervention involving Diego Rodriguez’s infant grandson.

Please produce the following documents. The definitions provided above apply to these document requests:

Documents:

1. All documents and communications relating to any service You have provided to any Defendant.
2. All documents and communications relating to any service You offer or provide, or have offered or provided, relating to child protective services or so-called medical kidnapping or child trafficking.
3. All documents and communications reflecting or referring to any payment made by You to any Defendant.
4. All documents and communications reflecting or referring to any payment made to You by any Defendant.
5. All documents and communications reflecting or referring to any payment made by You to Abish-husbondi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Freedom Tabernacle, Incorporated.
6. All documents and communications reflecting or referring to any payment made to You by Abish-husbondi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Freedom Tabernacle, Incorporated.
7. All documents and communications relating to the relationship between You and each of the Defendants.
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9. All documents or communications relating to the events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

2023-CA-11922

**IN THE CIRCUIT COURT OF THE
NINTH JUDICIAL CIRCUIT IN AND
FOR ORANGE COUNTY, FLORIDA**

ST. LUKE'S HEALTH SYSTEM, LTD; ST.
LUKE'S REGIONAL MEDICAL CENTER,
LTD; CHRIS ROTH, an individual;
NATASHA D. ERICKSON, MD, an
individual; and TRACY W. JUNGMAN, NP,
an individual,

Plaintiffs,

vs.

AMMON BUNDY, an individual; AMMON
BUNDY FOR GOVERNOR, a political
organization; DIEGO RODRIGUEZ, an
individual; FREEDOM MAN PRESS LLC, a
limited liability company; FREEDOM MAN
PAC, a registered political action committee;
and PEOPLE'S RIGHTS NETWORK, a
political organization,

Defendants.

In the District Court of the Fourth Judicial District of
the State of Idaho, in and for the County of Ada, Case
No. CV01-22-06789

SUBPOENA FOR VIDEOTAPED DEPOSITION DUCES TECUM

THE STATE OF FLORIDA SENDS GREETINGS TO:

Power Marketing Consultants LLC
Attn: Diego Rodriguez, Registered Agent
1317 Edgewater Dr., #5077
Orlando, FL 32804

YOU ARE HEREBY COMMANDED that all singular, business and excuses set aside,
you appear and attend a videotaped deposition on the **23rd day of May, 2023, at the hour of
9:00 a.m.** at the offices of **Holland & Hart LLP, 800 W. Main Street, Ste. 1750, Boise, Idaho
83702.** Your attendance is required to give testimony and/or to produce and permit inspection
and copying of documents or tangible things in your possession, custody or control.

///

///

If you fail to attend, you may be deemed guilty of contempt of Court and liable to pay all losses and damages caused by your failure to appear. Please see **Exhibit "A"** attached hereto for the topics and documents you are requested to bring to the deposition.

DATED this ____ day of May, 2023.

MAY 05 2023

TIFFANY MOORE RUSSELL

CLERK OF COURT

By: _____
Deputy



Herry

Submitted by:

By: /s/Erik F. Stidham

Erik F. Stidham (ISB #5483)
Jennifer M. Jensen (ISB #9275)
Zachery J. McCraney (ISB #11552)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com
jmjensen@hollandhart.com
zjmccraney@hollandhart.com
Counsel for Plaintiffs

EXHIBIT A

Power Marketing Consultants LLC

DEFINITIONS AND INSTRUCTIONS

Unless otherwise indicated, the following definitions shall apply to these discovery requests:

“You,” “your,” or “yours,” shall mean Power Marketing Consultants LLC, and any person acting or purporting to act on its behalf, including without limitation, all present and former agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

“Defendants” shall mean Ammon Bundy; Ammon Bundy for Governor; Diego Rodriguez; Freedom Man Press LLC; Freedom Man PAC; and People’s Rights Network; and any person acting or purporting to act on their behalf, including without limitation, all present and former officers, directors, employees, agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

The words “and,” “and/or,” “or” shall each be deemed to refer to both their conjunctive and disjunctive meanings, being construed as necessary to bring within the scope of the discovery request all information and documents which would otherwise be construed as being outside the request.

The term “communication” shall mean every manner of transmitting or receiving facts, information, opinions, or thoughts from one person to another person, whether orally, by documents, writing, email, or copy thereof, and to words transmitted by telephone, radio, or any method of voice recording.

The term “document” or “documents” shall mean the original, all copies and drafts of papers and writings of every kind, description and form, whether handwritten or typed, and all mechanical, magnetic media and electronic recordings, records and data of every kind, description and form, and all photographs of every kind, and including, without limiting the generality of the foregoing, the following: correspondence, letters, notes, e-mails, computer files, memoranda, reports, notebooks, binders, drawings, studies, analyses, drafts, diaries, calendars, datebooks, appointment books, day-timers, intra- or inter-office communications, canceled checks, minutes, bulletins, circulars, pamphlets, instructions, work assignments, messages (including reports, notes and memoranda of telephone conversations and conferences), telephone statements, calendar and diary entries, desk calendars, appointment books, job or transaction files, books of account, ledgers, bank statements, promissory notes, invoices, charge slips, working papers, graphs, charts, evaluation or appraisal reports, pleadings, transcripts of testimony or other documents filed or prepared in connection with any court or agency or other proceeding, contracts, agreements, assignments, instruments, charges, opinions, official statements, prospectuses, appraisals, feasibility studies, licenses, leases, invoices, computer printouts or programs, summaries, audio, video or sound recordings, cassette tapes, video recorded, electronic or laser recorded, or photographed information. Documents are to be taken as including all attachments, enclosures and other documents that are attached to, relate to or refer to such documents. Documents are also to include all electronically stored information

("ESI") made, maintained, retained, stored, or archived by computer or electronic means in any medium, including but not limited to word processing documents, email, email attachments, databases, spreadsheets, writings, drawings, graphs, photographs, sound recordings, images, data, and data compilations. Documents shall also include prior versions of information, as defined above, as well as all attachments, and shall include information stored on personal digital assistants, cell phones, Blackberries, personal laptop computers, hard drives, portable hard drives, and other similar devices.

"Person" shall mean any natural person and any other cognizable entity, including but not limited to corporations, proprietorships, partnerships, joint ventures, consortiums, clubs, associations, foundations, governmental agencies or instrumentalities, societies and orders, as well as any agents and employees thereof.

The words "relate to" or "relating to" means concerning, referring to, pertaining to, consisting of, containing, describing, involving, comparing, correlating, comparing, mentioning, discussing, evidencing, or having any logical or factual connection with the subject matter dealt with or alluded to the subparagraphs of these Requests.

Pursuant to Idaho Rule of Civil Procedure 30(b)(6), You are required to designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on Your behalf, regarding the topics described below. The person or persons designated must testify about information known or reasonably available to the organization. The definitions provided above apply to the deposition topics.

Topics:

1. The services You have provided to any Defendant.
2. The services You offer or provide, or have offered or provided, relating to child protective services or so-called medical kidnapping or child trafficking.
3. Revenue you have received from any Defendant or provided to any Defendant.
4. Revenue You have received from, or provided to, Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Freedom Tabernacle, Incorporated.
5. The relationship between You and each of the Defendants.
6. The relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.
7. The events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

Please produce the following documents. The definitions provided above apply to these document requests:

Documents:

1. All documents and communications relating to any service You have provided to any Defendant.
2. All documents and communications relating to any service You offer or provide, or have offered or provided, relating to child protective services or so-called medical kidnapping or child trafficking.
3. All documents and communications reflecting or referring to any payment made by You to any Defendant.
4. All documents and communications reflecting or referring to any payment made to You by any Defendant.
5. All documents and communications reflecting or referring to any payment made by You to Abish-husbondi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Freedom Tabernacle, Incorporated.
6. All documents and communications reflecting or referring to any payment made to You by Abish-husbondi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Freedom Tabernacle, Incorporated.
7. All documents and communications relating to the relationship between You and each of the Defendants.
8. All documents and communications relating to the relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.
9. All documents or communications relating to the events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

**IN THE CIRCUIT COURT OF THE NINTH
JUDICIAL CIRCUIT IN AND FOR
ORANGE COUNTY, FLORIDA**

ST. LUKE'S HEALTH SYSTEM, LTD; ST. LUKE'S REGIONAL MEDICAL CENTER, LTD; CHRIS ROTH, an individual; NATASHA D. ERICKSON, MD, an individual; and TRACY W. JUNGMAN, NP, an individual,

Plaintiffs,

vs.

AMMON BUNDY, an individual; AMMON BUNDY FOR GOVERNOR, a political organization; DIEGO RODRIGUEZ, an individual; FREEDOM MAN PRESS LLC, a limited liability company; FREEDOM MAN PAC, a registered political action committee; and PEOPLE'S RIGHTS NETWORK, a political organization,

Defendants.

In the District Court of the Fourth Judicial District of the State of Idaho, in and for the County of Ada, Case No. CV01-22-06789

**NOTICE OF TAKING VIDEOTAPED DEPOSITION DUCES TECUM
OF NON-PARTY WITNESS IN OUT-OF-STATE CASE**

TO: Power Marketing Consultants LLC
Attn: Diego Rodriguez, Registered Agent
1317 Edgewater Dr., #5077
Orlando, FL 32804

Power Marketing Consultants LLC
Attn: Diego Rodriguez, Registered Agent
Email: freedommanpress@protonmail.com

Plaintiffs, by and through their undersigned counsel, hereby gives notice of taking the deposition of POWER MARKETING CONSULTANTS LLC on **May 23, 2023, at 9:00 a.m. at Holland & Hart LLP, 800 W. Main Street, Ste. 1750, Boise, Idaho 83702.** Power Marketing

Consultants LLC shall designate an officer, director, or managing agent, or other person who consents to do so (the “Representative”), to testify on its behalf as to matters known or reasonably available to the organization with the areas of inquiry listed on the attached **Exhibit A**.

The deposition is being taken for the purpose of discovery, for use at trial, or both of the foregoing, or for such other purposes as are permitted under the applicable and governing rules. The deposition will continue from day-to-day until completed and will be videotaped.

The Representative shall also produce at his deposition the documents listed on the attached Exhibit A.

Dated: May 5, 2023.

HOLLAND & HART LLP

By: /s/Erik F. Stidham

Erik F. Stidham

Jennifer M. Jensen

Zachery J. McCraney

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of May, 2023, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Ammon Bundy for Governor
P.O. Box 370
Emmett, ID 83617

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Ammon Bundy for Governor
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

- U.S. Mail
- Hand Delivered
- Overnight Mail
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- U.S. Mail
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People's Rights Network
c/o Ammon Bundy
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- Email/iCourt/eServe:
freedommanpress@protonmail.com

Tucker & Associates Court Reporting

notice@etucker.net

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

EXHIBIT A

Power Marketing Consultants LLC

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as including all attachments, enclosures and other documents that are attached to, relate to or refer to such documents. Documents are also to include all electronically stored information (“ESI”) made, maintained, retained, stored, or archived by computer or electronic means in any medium, including but not limited to word processing documents, email, email attachments, databases, spreadsheets, writings, drawings, graphs, photographs, sound recordings, images, data, and data compilations. Documents shall also include prior versions of information, as defined above, as well as all attachments, and shall include information stored on personal digital assistants, cell phones, Blackberries, personal laptop computers, hard drives, portable hard drives, and other similar devices.

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2. The services You offer or provide, or have offered or provided, relating to child protective services or so-called medical kidnapping or child trafficking.
3. Revenue you have received from any Defendant or provided to any Defendant.
4. Revenue You have received from, or provided to, Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Freedom Tabernacle, Incorporated.
5. The relationship between You and each of the Defendants.
6. The relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.

7. The events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

Please produce the following documents. The definitions provided above apply to these document requests:

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3. All documents and communications reflecting or referring to any payment made by You to any Defendant.
4. All documents and communications reflecting or referring to any payment made to You by any Defendant.
5. All documents and communications reflecting or referring to any payment made by You to Abish-husbondi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Freedom Tabernacle, Incorporated.
6. All documents and communications reflecting or referring to any payment made to You by Abish-husbondi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Freedom Tabernacle, Incorporated.
7. All documents and communications relating to the relationship between You and each of the Defendants.
8. All documents and communications relating to the relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.
9. All documents or communications relating to the events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

Case # CV01-22-06789 - St Lukes Health System LTD, St Lukes Reg

Envelope Information

Envelope Id
6082219

Submitted Date
5/5/2023 3:26 PM MST

Submitted User Name
cmcarvalho@hollandhart.com

Case Information

Location
Ada County District Court

Category
Civil

Case Type
AA - All Initial District Court Filings (Not Listed In: E, F, and H1)

Case Initiation Date
5/11/2022

Case #
CV01-22-06789

Assigned to Judge
Norton, Lynn G.

Filings

Filing Type
Serve

Filing Code
Service Only


Filing Description
Amended Subpoena for Deposition Duces Tecum of Freedom Tabernacle, Incorporated

Filing Status
Served

Service Document

File Name	Description	Security	Download
Amended Subpoena for Deposition Duces Tecum of Freedom Tabernacle.pdf	Amended Subpoena for Deposition Duces Tecum of Freedom Tabernacle.pdf		Original File Court Copy

eService Details

Status	Name	Firm	Served	Date Opened
 Support	Rodriguez	Individual	Yes	5/5/2023 5:39 PM MST

Status	Name	Firm	Served	Date Opened
Sent	Boise Intake Team	Holland & Hart LLP	Yes	5/8/2023 11:20 AM MST
Sent	Erik Stidham	Holland & Hart LLP	Yes	Not Opened
Sent	Jennifer Jensen	Holland & Hart LLP	Yes	Not Opened
Sent	Zack McCraney	Holland & Hart LLP	Yes	Not Opened

Filing Type

Serve

Filing Code

Service Only

Filing Description

Amended Subpoena for Deposition Duces
Tecum of Power Marketing Consultants
LLC

Filing Status

Served

Service Document

File Name	Description	Security	Download
Amended Subpoena for Deposition Duces Tecum of Power Marketing Consultants.pdf	Amended Subpoena for Deposition Duces Tecum of Power Marketing Consultants.pdf		Original File Court Copy

eService Details

Status	Name	Firm	Served	Date Opened
Sent	Boise Intake Team	Holland & Hart LLP	Yes	5/8/2023 11:21 AM MST
Sent	Erik Stidham	Holland & Hart LLP	Yes	Not Opened
Sent	Jennifer Jensen	Holland & Hart LLP	Yes	Not Opened
Sent	Zack McCraney	Holland & Hart LLP	Yes	Not Opened
Sent	Diego Rodriguez	Individual	Yes	5/5/2023 5:39 PM MST

Filing Type

EFileAndServe

Filing Code

Notice

Filing Description

of Intent to Service Subpoena for
Deposition Duces Tecum to Marissa
Anderson

Filing Status

Accepted

Accepted Date

5/8/2023 8:35 AM MST

Lead Document

File Name	Description	Security	Download
Notice of Intent to Serve Subpoena DT on Marissa Anderson.pdf	Notice of Intent to Service Subpoena for Deposition Duces Tecum to Marissa Anderson	Public	Original File Court Copy

eService Details

Status	Name	Firm	Served	Date Opened
Sent	Jennifer Jensen	Holland & Hart LLP	Yes	Not Opened
Sent	Zack McCraney	Holland & Hart LLP	Yes	Not Opened
Sent	Erik Stidham	Holland & Hart LLP	Yes	Not Opened
Sent	Boise Intake Team	Holland & Hart LLP	Yes	5/8/2023 11:21 AM MST
Sent	Diego Rodriguez	Individual	Yes	5/5/2023 5:38 PM MST

Filing Type

EFileAndServe

Filing Code

Notice

Filing Description

of Intent to Serve Subpoena for
Deposition Duces Tecum to Levi
Anderson

Filing Status

Accepted

Accepted Date

5/8/2023 8:35 AM MST

Lead Document

File Name	Description	Security	Download
Notice of Intent to Serve Subpoena DT on Levi Anderson.pdf	Notice of Intent to Serve Subpoena for Deposition	Public	Original File Court Copy

Duces Tecum to Levi
Anderson

eService Details

Status	Name	Firm	Served	Date Opened
Sent	Zack McCraney	Holland & Hart LLP	Yes	Not Opened
Sent	Jennifer Jensen	Holland & Hart LLP	Yes	Not Opened
Sent	Erik Stidham	Holland & Hart LLP	Yes	Not Opened
Sent	Boise Intake Team	Holland & Hart LLP	Yes	5/8/2023 11:22 AM MST
Sent	Diego Rodriguez	Individual	Yes	5/5/2023 5:38 PM MST

Parties with No eService

Name
Chris Roth

Address

Name
Natasha D Erickson

Address

Name
Ammon Bundy

Address

Name
Ammon Bundy for Governor

Address

Name
Freedom Man PAC

Address

Name
Peoples Rights Network

Address

Name
Freedom Man Press LLC

Address

Name
St Lukes Health System LTD

Address

Name
Tracy W Jungman

Address

Name
Ada County Prosecutors Office

Address

Name
Kyle Bringhurst

Address

Fees

Service Only

Description	Amount
Filing Fee	\$0.00
Filing Total: \$0.00	

Service Only

Description	Amount
Filing Fee	\$0.00
Filing Total: \$0.00	

Notice

Description	Amount
Filing Fee	\$0.00
Filing Total: \$0.00	

Notice

Description	Amount
Filing Fee	\$0.00
Filing Total: \$0.00	

Total Filing Fee	\$0.00
Envelope Total: \$0.00	

Transaction Amount	\$0.00
Transaction Id	8037138
Filing Attorney	Erik Stidham
Transaction Response	Authorized

Order Id

Exhibit I

Erik F. Stidham (ISB #5483)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com

Counsel for Plaintiffs

**IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA**

ST. LUKE'S HEALTH SYSTEM, LTD; ST.
LUKE'S REGIONAL MEDICAL CENTER,
LTD; CHRIS ROTH, an individual;
NATASHA D. ERICKSON, MD, an
individual; and TRACY W. JUNGMAN, NP,
an individual,

Plaintiffs,

vs.

AMMON BUNDY, an individual; AMMON
BUNDY FOR GOVERNOR, a political
organization; DIEGO RODRIGUEZ, an
individual; FREEDOM MAN PRESS LLC, a
limited liability company; FREEDOM MAN
PAC, a registered political action committee;
and PEOPLE'S RIGHTS NETWORK, a
political organization,

Defendants.

Case No. CV01-22-06789

**NOTICE OF INTENT TO SERVE
SUBPOENA DUCES TECUM TO
FREEDOM TABERNACLE,
INCORPORATED**

PLEASE TAKE NOTICE THAT pursuant to Rule 45(c)(2) of the Idaho Rules of Civil Procedure, Plaintiffs, St. Luke's Health System, Ltd, St. Luke's Regional Medical Center, Ltd, Chris Roth, Natasha D. Erickson, MD, and Tracy W. Jungman, NP, by and through their attorneys of record, Holland & Hart LLP, intend to serve a Subpoena duces tecum in the form

**NOTICE OF INTENT TO SERVE SUBPOENA DUCES TECUM TO FREEDOM
TABERNACLE, INCORPORATED - 1**

attached hereto as “Exhibit A” on **Freedom Tabernacle, Incorporated**. Plaintiffs intend to serve the Subpoena duces tecum on January 3, 2023 or as soon thereafter as service may be effectuated.

DATED: December 27, 2022.

HOLLAND & HART LLP

By: */s/Erik F. Stidham*

Erik F. Stidham

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of December, 2022, I caused to be filed and served, via iCourt, a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Ammon Bundy for Governor
P.O. Box 370
Emmett, ID 83617

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Ammon Bundy for Governor
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

People's Rights Network
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

People's Rights Network
c/o Ammon Bundy
P.O. Box 370
Emmett, ID 83617

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Freedom Man Press LLC
c/o Diego Rodriguez
1317 Edgewater Dr. #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Freedom Man Press LLC
c/o Diego Rodriguez
9169 W. State St., Ste. 3177
Boise, ID 83714

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Freedom Man PAC
c/o Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:
freedommanpress@protonmail.com

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

20585449_v1

EXHIBIT A

Erik F. Stidham (ISB #5483)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com

Counsel for Plaintiffs

**IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA**

ST. LUKE'S HEALTH SYSTEM, LTD; ST.
LUKE'S REGIONAL MEDICAL CENTER,
LTD; CHRIS ROTH, an individual;
NATASHA D. ERICKSON, MD, an
individual; and TRACY W. JUNGMAN, NP,
an individual,

Plaintiffs,

vs.

AMMON BUNDY, an individual; AMMON
BUNDY FOR GOVERNOR, a political
organization; DIEGO RODRIGUEZ, an
individual; FREEDOM MAN PRESS LLC, a
limited liability company; FREEDOM MAN
PAC, a registered political action committee;
and PEOPLE'S RIGHTS NETWORK, a
political organization,

Defendants.

Case No. CV01-22-06789

**SUBPOENA DUCES TECUM OF
FREEDOM TABERNACLE,
INCORPORATED**

STATE OF IDAHO TO: Freedom Tabernacle, Incorporated
Attn: Diego Rodriguez, Registered Agent
1876 E. Adelaide Drive
Meridian, Idaho 83642-9219

**SUBPOENA DUCES TECUM OF FREEDOM TABERNACLE,
INCORPORATED - 1**

YOU ARE COMMANDED:

- to appear in the Court at the place, date, and time specified below to testify in the above case.
- to appear at the place, date, and time specified below to testify at the taking of a videotaped deposition in the above case.

PLACE: Holland & Hart LLP
800 W. Main Street, Suite 1750
Boise, ID 83702

DATE/TIME: February 6, 2023, at 9:30 a.m.

- to produce or permit inspection and copying of the following documents or objects, including electronically stored information, at the place, date, and time specified below.

PLACE: Holland & Hart LLP
800 W. Main Street, Suite 1750
Boise, ID 83702

DATE/TIME: On or before February 6, 2023, at 9:30 a.m.

- to permit inspection of the following premises at the date and time specified below.

[SEE ATTACHMENT A]

You are further notified that if you fail to appear at the place and time specified above, or to produce or permit copying or inspection as specified above, that you may be held in contempt of court and that the aggrieved party may recover from you the sum of \$100 and all damages which the party may sustain by your failure to comply with this subpoena.

DATED: December ___, 2022.

HOLLAND & HART LLP

Erik F. Stidham
Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this _____ day of December, 2022, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Ammon Bundy for Governor
P.O. Box 370
Emmett, ID 83617

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Ammon Bundy for Governor
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

- U.S. Mail
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- Overnight Mail
- Email/iCourt/eServe:

Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

People’s Rights Network
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

People’s Rights Network
c/o Ammon Bundy
P.O. Box 370
Emmett, ID 83617

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Freedom Man Press LLC
c/o Diego Rodriguez
1317 Edgewater Dr. #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Freedom Man Press LLC
c/o Diego Rodriguez
9169 W. State St., Ste. 3177
Boise, ID 83714

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Freedom Man PAC
c/o Diego Rodriguez
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Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Diego Rodriguez

- U.S. Mail

1317 Edgewater Dr., #5077
Orlando, FL 32804

- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:
freedommanpress@protonmail.com

Tucker & Associates Court Reporting

notice@etucker.net

Erik F. Stidham
OF HOLLAND & HART LLP

20585328_v1

EXHIBIT A

EXHIBIT A

Freedom Tabernacle Incorporated

DEFINITIONS AND INSTRUCTIONS

Unless otherwise indicated, the following definitions shall apply to these discovery requests:

A. “You,” “your,” or “yours,” shall mean Freedom Tabernacle Incorporated, and any person acting or purporting to act on its behalf, including without limitation, all present and former agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

B. “Defendants” shall mean Ammon Bundy; Ammon Bundy for Governor; Diego Rodriguez; Freedom Man Press LLC; Freedom Man PAC; and People’s Rights Network; and any person acting or purporting to act on their behalf, including without limitation, all present and former officers, directors, employees, agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

C. The words “and,” “and/or,” “or” shall each be deemed to refer to both their conjunctive and disjunctive meanings, being construed as necessary to bring within the scope of the discovery request all information and documents which would otherwise be construed as being outside the request.

D. The term “communication” shall mean every manner of transmitting or receiving facts, information, opinions, or thoughts from one person to another person, whether orally, by documents, writing, email, or copy thereof, and to words transmitted by telephone, radio, or any method of voice recording.

E. The term “document” or “documents” shall mean the original, all copies and drafts of papers and writings of every kind, description and form, whether handwritten or typed, and all mechanical, magnetic media and electronic recordings, records and data of every kind, description and form, and all photographs of every kind, and including, without limiting the generality of the foregoing, the following: correspondence, letters, notes, e-mails, computer files, memoranda, reports, notebooks, binders, drawings, studies, analyses, drafts, diaries, calendars, datebooks, appointment books, day-timers, intra- or inter-office communications, canceled checks, minutes, bulletins, circulars, pamphlets, instructions, work assignments, messages (including reports, notes and memoranda of telephone conversations and conferences), telephone statements, calendar and diary entries, desk calendars, appointment books, job or transaction files, books of account, ledgers, bank statements, promissory notes, invoices, charge slips, working papers, graphs, charts, evaluation or appraisal reports, pleadings, transcripts of testimony or other documents filed or prepared in connection with any court or agency or other proceeding, contracts, agreements, assignments, instruments, charges, opinions, official statements, prospectuses, appraisals, feasibility studies, licenses, leases, invoices, computer printouts or programs, summaries, audio, video or sound recordings, cassette tapes, video recorded, electronic or laser recorded, or photographed information. Documents are to be taken

as including all attachments, enclosures and other documents that are attached to, relate to or refer to such documents. Documents are also to include all electronically stored information (“ESI”) made, maintained, retained, stored, or archived by computer or electronic means in any medium, including but not limited to word processing documents, email, email attachments, databases, spreadsheets, writings, drawings, graphs, photographs, sound recordings, images, data, and data compilations. Documents shall also include prior versions of information, as defined above, as well as all attachments, and shall include information stored on personal digital assistants, cell phones, Blackberries, personal laptop computers, hard drives, portable hard drives, and other similar devices.

F. “Person” shall mean any natural person and any other cognizable entity, including but not limited to corporations, proprietorships, partnerships, joint ventures, consortiums, clubs, associations, foundations, governmental agencies or instrumentalities, societies and orders, as well as any agents and employees thereof.

G. The words “relate to” or “relating to” means concerning, referring to, pertaining to, consisting of, containing, describing, involving, comparing, correlating, comparing, mentioning, discussing, evidencing, or having any logical or factual connection with the subject matter dealt with or alluded to the subparagraphs of these Requests.

Pursuant to Idaho Rule of Civil Procedure 30(b)(6), You are required to designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on Your behalf, regarding the topics described below. The person or persons designated must testify about information known or reasonably available to the organization. The definitions provided above apply to the deposition topics.

Topics:

1. The services You have provided to any Defendant.
2. The services You offer or provide, or have offered or provided, relating to child protective services or so-called medical kidnapping or child trafficking.
3. Revenue you have received from any Defendant or provided to any Defendant.
4. Revenue You have received from, or provided to, Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Power Marketing Consultants LLC.
5. The relationship between You and each of the Defendants.
6. The relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.

7. The events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

Please produce the following documents. The definitions provided above apply to these document requests:

Documents:

1. All documents and communications relating to any service You have provided to any Defendant.
2. All documents and communications relating to any service You offer or provide, or have offered or provided, relating to child protective services or so-called medical kidnapping or child trafficking.
3. All documents and communications reflecting or referring to any payment made by You to any Defendant.
4. All documents and communications reflecting or referring to any payment made to You by any Defendant.
5. All documents and communications reflecting or referring to any payment made by You to Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Power Marketing Consultants LLC.
6. All documents and communications reflecting or referring to any payment made to You by Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Power Marketing Consultants LLC.
7. All documents and communications relating to the relationship between You and each of the Defendants.
8. All documents and communications relating to the relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.
9. All documents or communications relating to the events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

Exhibit J

Erik F. Stidham (ISB #5483)
Jennifer M. Jensen (ISB #9275)
Zachery J. McCraney (ISB #11552)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com
jmjensen@hollandhart.com
zmccraney@hollandhart.com

Counsel for Plaintiffs

**IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA**

ST. LUKE'S HEALTH SYSTEM, LTD; ST.
LUKE'S REGIONAL MEDICAL CENTER,
LTD; CHRIS ROTH, an individual;
NATASHA D. ERICKSON, MD, an
individual; and TRACY W. JUNGMAN, NP,
an individual,

Plaintiffs,

vs.

AMMON BUNDY, an individual; AMMON
BUNDY FOR GOVERNOR, a political
organization; DIEGO RODRIGUEZ, an
individual; FREEDOM MAN PRESS LLC, a
limited liability company; FREEDOM MAN
PAC, a registered political action committee;
and PEOPLE'S RIGHTS NETWORK, a
political organization and an unincorporated
association,

Defendants.

Case No. CV01-22-06789

**RETURN OF SERVICE – FREEDOM
TABERNACLE, INCORPORATED**

VERIFIED RETURN OF SERVICE

State of Florida

County of Orange

Circuit Court

Case Number: 2023-CA-11926 Court Date: 5/23/2023 9:00 am

Plaintiff: **ST. LUKE'S HEALTH SYSTEM, LTD; ST LUKE'S REGIONAL MEDICAL CENTER, LTD; CHRIS ROTH, AN INDIVIDUAL; NATASHA D. ERICKSON, MD, AN INDIVIDUAL; AND TRACY W. JUNGMAN, NP, AN INDIVIDUAL,**

vs.

Defendant: **AMMON BUNDY, AN INDIVIDUAL; AMMON BUNDY FOR GOVERNOR, A POLITICAL ORGANIZATION; DIEGO RODRIGUEZ, AN INDIVIDUAL; FREEDOM MAN PRESS LLC, A LIMITED LIABILITY COMPANY; FREEDOM MAN PAC, A REGISTERED POLITICAL ACTION COMMITTEE; AND PEOPLE'S RIGHTS NETWORK, A POLITICAL ORGANIZATION,**

For:

Erik F. Stidham
Holland & Hart LLP
800 W. Main Street
Suite 1750
Boise, ID 83702-5974

Received by Magic Process on the 5th day of May, 2023 at 2:01 pm to be served on **FREEDOM TABERNACLE, INCORPORATED, 1317 EDGEWATER DR, #5077, ORLANDO, FL 32804**

I, Edwin Young, do hereby affirm that on the **5th day of May, 2023 at 4:21 pm, I:**

served a **CORPORATION** by delivering a true copy of the **SUBPOENA FOR VIDEOTAPED DEPOSITION DUCES TECUM, EXHIBIT A, CERTIFICATE OF SERVICE, NOTICE OF TAKING VIDEOTAPED DEPOSITION DUCES TECUM OF NON-PARTY WITNESS IN OUT-OF-STATE CASE, CERTIFICATE OF SERVICE, EXHIBIT A** with the date and hour of service endorsed thereon by me, to: **AMELIA NELSON** as **FRONT DESK** for **FREEDOM TABERNACLE, INCORPORATED**, at the address of: **1317 EDGEWATER DR, #5077, ORLANDO, FL 32804**, and informed said person of the contents therein, in compliance with state statutes.

Description of Person Served: Age: 24, Sex: F, Race/Skin Color: Black, Height: 5'6", Weight: 190, Hair: Black, Glasses: Y

I certify that I am over the age of 18, have no interest in the above action, and am a Certified Process Server, in good standing, in the judicial circuit in which the process was served. Under Penalty of Perjury, I declare that I have read the foregoing document and that the facts stated in it are true to the best of my knowledge. Notary not required pursuant to Florida Statute 92.525 verification of documents.



Edwin Young
0178

Magic Process
924 N. Magnolia Ave.
Suite 220
Orlando, FL 32803
(407) 541-0697

Our Job Serial Number: MGP-2023007313



CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of May, 2023, I caused to be filed via iCourt and served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Ammon Bundy for Governor
P.O. Box 370
Emmett, ID 83617

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Ammon Bundy for Governor
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

- U.S. Mail
- Hand Delivered
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- Email/iCourt/eServe:

Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

People's Rights Network
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

- U.S. Mail
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- Email/iCourt/eServe:

People's Rights Network
c/o Ammon Bundy
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Emmett, ID 83617

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Freedom Man Press LLC
c/o Diego Rodriguez
1317 Edgewater Dr. #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Freedom Man Press LLC
c/o Diego Rodriguez
9169 W. State St., Ste. 3177
Boise, ID 83714

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Freedom Man PAC
c/o Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
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- Email/iCourt/eServe:

Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:
freedommanpress@protonmail.com

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

18472140_v1

Erik F. Stidham (ISB #5483)
Jennifer M. Jensen (ISB #9275)
Zachery J. McCraney (ISB #11552)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com
jmjensen@hollandhart.com
zmccraney@hollandhart.com

Counsel for Plaintiffs

**IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA**

ST. LUKE'S HEALTH SYSTEM, LTD; ST.
LUKE'S REGIONAL MEDICAL CENTER,
LTD; CHRIS ROTH, an individual;
NATASHA D. ERICKSON, MD, an
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an individual,

Plaintiffs,

vs.

AMMON BUNDY, an individual; AMMON
BUNDY FOR GOVERNOR, a political
organization; DIEGO RODRIGUEZ, an
individual; FREEDOM MAN PRESS LLC, a
limited liability company; FREEDOM MAN
PAC, a registered political action committee;
and PEOPLE'S RIGHTS NETWORK, a
political organization,

Defendants.

Case No. CV01-22-06789

**AMENDED SUBPOENA FOR
DEPOSITION DUCES TECUM OF
FREEDOM TABERNACLE,
INCORPORATED**

STATE OF IDAHO TO: Freedom Tabernacle, Incorporated
Attn: Diego Rodriguez, Registered Agent
1317 Edgewater Dr., #5077
Orlando, FL 32804

Freedom Tabernacle, Incorporated
Attn: Diego Rodriguez, Registered Agent
Email: freedommanpress@protonmail.com

YOU ARE COMMANDED:

- to appear in the Court at the place, date, and time specified below to testify in the above case.
- to appear at the place, date, and time specified below to testify at the taking of a videotaped deposition in the above case.

PLACE: Holland & Hart LLP
800 W. Main Street, Suite 1750
Boise, ID 83702

DATE/TIME: May 22, 2023, at 9:00 a.m.

- to produce or permit inspection and copying of the following documents or objects, including electronically stored information, at the place, date, and time specified below.

PLACE: Holland & Hart LLP
800 W. Main Street, Suite 1750
Boise, ID 83702

DATE/TIME: On or before May 22, 2023, at 9:00 a.m.

- to permit inspection of the following premises at the date and time specified below.

[SEE ATTACHMENT A]

You are further notified that if you fail to appear at the place and time specified above, or to produce or permit copying or inspection as specified above, that you may be held in contempt of court and that the aggrieved party may recover from you the sum of \$100 and all damages which the party may sustain by your failure to comply with this subpoena.

DATED: May 5, 2023

HOLLAND & HART LLP

By: /s/Erik F. Stidham

Erik F. Stidham

Jennifer M. Jensen

Zachery J. McCraney

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of May, 2023, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Ammon Bundy for Governor	<input checked="" type="checkbox"/>	U.S. Mail
P.O. Box 370	<input type="checkbox"/>	Hand Delivered
Emmett, ID 83617	<input type="checkbox"/>	Overnight Mail
	<input type="checkbox"/>	Email/iCourt/eServe:

Ammon Bundy for Governor	<input checked="" type="checkbox"/>	U.S. Mail
c/o Ammon Bundy	<input type="checkbox"/>	Hand Delivered
4615 Harvest Ln.	<input type="checkbox"/>	Overnight Mail
Emmett, ID 83617-3601	<input type="checkbox"/>	Email/iCourt/eServe:

Ammon Bundy	<input checked="" type="checkbox"/>	U.S. Mail
4615 Harvest Ln.	<input type="checkbox"/>	Hand Delivered
Emmett, ID 83617-3601	<input type="checkbox"/>	Overnight Mail
	<input type="checkbox"/>	Email/iCourt/eServe:

People's Rights Network	<input checked="" type="checkbox"/>	U.S. Mail
c/o Ammon Bundy	<input type="checkbox"/>	Hand Delivered
4615 Harvest Ln.	<input type="checkbox"/>	Overnight Mail
Emmett, ID 83617-3601	<input type="checkbox"/>	Email/iCourt/eServe:

People's Rights Network	<input checked="" type="checkbox"/>	U.S. Mail
c/o Ammon Bundy	<input type="checkbox"/>	Hand Delivered
P.O. Box 370	<input type="checkbox"/>	Overnight Mail
Emmett, ID 83617	<input type="checkbox"/>	Email/iCourt/eServe:

Freedom Man Press LLC	<input checked="" type="checkbox"/>	U.S. Mail
c/o Diego Rodriguez	<input type="checkbox"/>	Hand Delivered
1317 Edgewater Dr. #5077	<input type="checkbox"/>	Overnight Mail
Orlando, FL 32804	<input type="checkbox"/>	Email/iCourt/eServe:

Freedom Man Press LLC	<input checked="" type="checkbox"/>	U.S. Mail
c/o Diego Rodriguez	<input type="checkbox"/>	Hand Delivered
9169 W. State St., Ste. 3177	<input type="checkbox"/>	Overnight Mail
Boise, ID 83714	<input type="checkbox"/>	Email/iCourt/eServe:

Freedom Man PAC	<input checked="" type="checkbox"/>	U.S. Mail
c/o Diego Rodriguez	<input type="checkbox"/>	Hand Delivered
1317 Edgewater Dr., #5077	<input type="checkbox"/>	Overnight Mail
Orlando, FL 32804	<input type="checkbox"/>	Email/iCourt/eServe:

Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:
freedommanpress@protonmail.com

Tucker & Associates Court Reporting

notice@etucker.net

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

21375429_v1

EXHIBIT A

Freedom Tabernacle Incorporated

DEFINITIONS AND INSTRUCTIONS

Unless otherwise indicated, the following definitions shall apply to these discovery requests:

“You,” “your,” or “yours,” shall mean Freedom Tabernacle Incorporated, and any person acting or purporting to act on its behalf, including without limitation, all present and former agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

“Defendants” shall mean Ammon Bundy; Ammon Bundy for Governor; Diego Rodriguez; Freedom Man Press LLC; Freedom Man PAC; and People’s Rights Network; and any person acting or purporting to act on their behalf, including without limitation, all present and former officers, directors, employees, agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

The words “and,” “and/or,” “or” shall each be deemed to refer to both their conjunctive and disjunctive meanings, being construed as necessary to bring within the scope of the discovery request all information and documents which would otherwise be construed as being outside the request.

The term “communication” shall mean every manner of transmitting or receiving facts, information, opinions, or thoughts from one person to another person, whether orally, by documents, writing, email, or copy thereof, and to words transmitted by telephone, radio, or any method of voice recording.

The term “document” or “documents” shall mean the original, all copies and drafts of papers and writings of every kind, description and form, whether handwritten or typed, and all mechanical, magnetic media and electronic recordings, records and data of every kind, description and form, and all photographs of every kind, and including, without limiting the generality of the foregoing, the following: correspondence, letters, notes, e-mails, computer files, memoranda, reports, notebooks, binders, drawings, studies, analyses, drafts, diaries, calendars, datebooks, appointment books, day-timers, intra- or inter-office communications, canceled checks, minutes, bulletins, circulars, pamphlets, instructions, work assignments, messages (including reports, notes and memoranda of telephone conversations and conferences), telephone statements, calendar and diary entries, desk calendars, appointment books, job or transaction files, books of account, ledgers, bank statements, promissory notes, invoices, charge slips, working papers, graphs, charts, evaluation or appraisal reports, pleadings, transcripts of testimony or other documents filed or prepared in connection with any court or agency or other proceeding, contracts, agreements, assignments, instruments, charges, opinions, official statements, prospectuses, appraisals, feasibility studies, licenses, leases, invoices, computer printouts or programs, summaries, audio, video or sound recordings, cassette tapes, video recorded, electronic or laser recorded, or photographed information. Documents are to be taken

as including all attachments, enclosures and other documents that are attached to, relate to or refer to such documents. Documents are also to include all electronically stored information (“ESI”) made, maintained, retained, stored, or archived by computer or electronic means in any medium, including but not limited to word processing documents, email, email attachments, databases, spreadsheets, writings, drawings, graphs, photographs, sound recordings, images, data, and data compilations. Documents shall also include prior versions of information, as defined above, as well as all attachments, and shall include information stored on personal digital assistants, cell phones, Blackberries, personal laptop computers, hard drives, portable hard drives, and other similar devices.

“Person” shall mean any natural person and any other cognizable entity, including but not limited to corporations, proprietorships, partnerships, joint ventures, consortiums, clubs, associations, foundations, governmental agencies or instrumentalities, societies and orders, as well as any agents and employees thereof.

The words “relate to” or “relating to” means concerning, referring to, pertaining to, consisting of, containing, describing, involving, comparing, correlating, comparing, mentioning, discussing, evidencing, or having any logical or factual connection with the subject matter dealt with or alluded to the subparagraphs of these Requests.

Pursuant to Idaho Rule of Civil Procedure 30(b)(6), You are required to designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on Your behalf, regarding the topics described below. The person or persons designated must testify about information known or reasonably available to the organization. The definitions provided above apply to the deposition topics.

Topics:

1. The services You have provided to any Defendant.
2. The services You offer or provide, or have offered or provided, relating to child protective services or so-called medical kidnapping or child trafficking.
3. Revenue you have received from any Defendant or provided to any Defendant.
4. Revenue You have received from, or provided to, Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Power Marketing Consultants LLC.
5. The relationship between You and each of the Defendants.
6. The relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.

7. The events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

Please produce the following documents. The definitions provided above apply to these document requests:

Documents:

1. All documents and communications relating to any service You have provided to any Defendant.
2. All documents and communications relating to any service You offer or provide, or have offered or provided, relating to child protective services or so-called medical kidnapping or child trafficking.
3. All documents and communications reflecting or referring to any payment made by You to any Defendant.
4. All documents and communications reflecting or referring to any payment made to You by any Defendant.
5. All documents and communications reflecting or referring to any payment made by You to Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Power Marketing Consultants LLC.
6. All documents and communications reflecting or referring to any payment made to You by Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Power Marketing Consultants LLC.
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9. All documents or communications relating to the events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

2023-CA-11926

**IN THE CIRCUIT COURT OF THE
NINTH JUDICIAL CIRCUIT IN AND
FOR ORANGE COUNTY, FLORIDA**

ST. LUKE'S HEALTH SYSTEM, LTD; ST.
LUKE'S REGIONAL MEDICAL CENTER,
LTD; CHRIS ROTH, an individual;
NATASHA D. ERICKSON, MD, an
individual; and TRACY W. JUNGMAN, NP,
an individual,

Plaintiffs,

vs.

AMMON BUNDY, an individual; AMMON
BUNDY FOR GOVERNOR, a political
organization; DIEGO RODRIGUEZ, an
individual; FREEDOM MAN PRESS LLC, a
limited liability company; FREEDOM MAN
PAC, a registered political action committee;
and PEOPLE'S RIGHTS NETWORK, a
political organization,

Defendants.

In the District Court of the Fourth Judicial District of
the State of Idaho, in and for the County of Ada, Case
No. CV01-22-06789

SUBPOENA FOR VIDEOTAPED DEPOSITION DUCES TECUM

THE STATE OF FLORIDA SENDS GREETINGS TO:

Freedom Tabernacle, Incorporated
Attn: Diego Rodriguez, Registered Agent
1317 Edgewater Dr., #5077
Orlando, FL 32804

YOU ARE HEREBY COMMANDED that all singular, business and excuses set aside,
you appear and attend a videotaped deposition on the **22nd day of May, 2023, at the hour of
9:00 a.m.** at the offices of **Holland & Hart LLP, 800 W. Main Street, Ste. 1750, Boise, Idaho
83702.** Your attendance is required to give testimony and/or to produce and permit inspection
and copying of documents or tangible things in your possession, custody or control.

///

///

If you fail to attend, you may be deemed guilty of contempt of Court and liable to pay all losses and damages caused by your failure to appear. Please see **Exhibit "A"** attached hereto for the topics and documents you are requested to bring to the deposition.

DATED this MAY 05 2023 day of May, 2023.

TIFFANY MOORE RUSSELL

CLERK OF COURT

By: _____
Deputy



[Handwritten signature]

Submitted by:

By: /s/Erik F. Stidham

Erik F. Stidham (ISB #5483)
Jennifer M. Jensen (ISB #9275)
Zachery J. McCraney (ISB #11552)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com
jmjensen@hollandhart.com
zjmccraney@hollandhart.com
Counsel for Plaintiffs

EXHIBIT A

Freedom Tabernacle, Incorporated

DEFINITIONS AND INSTRUCTIONS

Unless otherwise indicated, the following definitions shall apply to these discovery requests:

“You,” “your,” or “yours,” shall mean Freedom Tabernacle Incorporated, and any person acting or purporting to act on its behalf, including without limitation, all present and former agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

“Defendants” shall mean Ammon Bundy; Ammon Bundy for Governor; Diego Rodriguez; Freedom Man Press LLC; Freedom Man PAC; and People’s Rights Network; and any person acting or purporting to act on their behalf, including without limitation, all present and former officers, directors, employees, agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

The words “and,” “and/or,” “or” shall each be deemed to refer to both their conjunctive and disjunctive meanings, being construed as necessary to bring within the scope of the discovery request all information and documents which would otherwise be construed as being outside the request.

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("ESI") made, maintained, retained, stored, or archived by computer or electronic means in any medium, including but not limited to word processing documents, email, email attachments, databases, spreadsheets, writings, drawings, graphs, photographs, sound recordings, images, data, and data compilations. Documents shall also include prior versions of information, as defined above, as well as all attachments, and shall include information stored on personal digital assistants, cell phones, Blackberries, personal laptop computers, hard drives, portable hard drives, and other similar devices.

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Pursuant to Idaho Rule of Civil Procedure 30(b)(6), You are required to designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on Your behalf, regarding the topics described below. The person or persons designated must testify about information known or reasonably available to the organization. The definitions provided above apply to the deposition topics.

Topics:

1. The services You have provided to any Defendant.
2. The services You offer or provide, or have offered or provided, relating to child protective services or so-called medical kidnapping or child trafficking.
3. Revenue you have received from any Defendant or provided to any Defendant.
4. Revenue You have received from, or provided to, Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Power Marketing Consultants LLC.
5. The relationship between You and each of the Defendants.
6. The relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.
7. The events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

Please produce the following documents. The definitions provided above apply to these document requests:

Documents:

1. All documents and communications relating to any service You have provided to any Defendant.
2. All documents and communications relating to any service You offer or provide, or have offered or provided, relating to child protective services or so-called medical kidnapping or child trafficking.
3. All documents and communications reflecting or referring to any payment made by You to any Defendant.
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IN THE CIRCUIT COURT OF THE NINTH
JUDICIAL CIRCUIT IN AND FOR
ORANGE COUNTY, FLORIDA

ST. LUKE'S HEALTH SYSTEM, LTD; ST.
LUKE'S REGIONAL MEDICAL CENTER,
LTD; CHRIS ROTH, an individual;
NATASHA D. ERICKSON, MD, an
individual; and TRACY W. JUNGMAN, NP,
an individual,

Plaintiffs,

vs.

AMMON BUNDY, an individual; AMMON
BUNDY FOR GOVERNOR, a political
organization; DIEGO RODRIGUEZ, an
individual; FREEDOM MAN PRESS LLC, a
limited liability company; FREEDOM MAN
PAC, a registered political action committee;
and PEOPLE'S RIGHTS NETWORK, a
political organization,

Defendants.

In the District Court of the Fourth Judicial District of
the State of Idaho, in and for the County of Ada, Case
No. CV01-22-06789

**NOTICE OF TAKING VIDEOTAPED DEPOSITION DUCES TECUM
OF NON-PARTY WITNESS IN OUT-OF-STATE CASE**

TO: Freedom Tabernacle, Incorporated
Attn: Diego Rodriguez, Registered Agent
1317 Edgewater Dr., #5077
Orlando, FL 32804

Freedom Tabernacle, Incorporated
Attn: Diego Rodriguez, Registered Agent
Email: freedommanpress@protonmail.com

Plaintiffs, by and through their undersigned counsel, hereby give notice of taking the
deposition of FREEDOM TABERNACLE, INCORPORATED on **May 22, 2023, at 9:00 a.m.**
at **Holland & Hart LLP, 800 W. Main Street, Ste. 1750, Boise, Idaho 83702.** Freedom

Tabernacle, Incorporated shall designate an officer, director, or managing agent, or other person who consents to do so (the “Representative”), to testify on its behalf as to matters known or reasonably available to the organization with the areas of inquiry listed on the attached **Exhibit A**.

The deposition is being taken for the purpose of discovery, for use at trial, or both of the foregoing, or for such other purposes as are permitted under the applicable and governing rules. The deposition will continue from day-to-day until completed and will be videotaped.

The Representative shall also produce at his deposition the documents listed on the attached Exhibit A.

Dated: May 5, 2023.

By: /s/Erik F. Stidham

Erik F. Stidham (ISB #5483)
Jennifer M. Jensen (ISB #9275)
Zachery J. McCraney (ISB #11552)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com
jmjensen@hollandhart.com
zjmccraney@hollandhart.com
Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of May, 2023, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Ammon Bundy for Governor
P.O. Box 370
Emmett, ID 83617

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Emmett, ID 83617-3601

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- Email/iCourt/eServe:

People's Rights Network
c/o Ammon Bundy
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Emmett, ID 83617-3601

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freedommanpress@protonmail.com

Tucker & Associates Court Reporting

notice@etucker.net

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

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Topics:

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2. The services You offer or provide, or have offered or provided, relating to child protective services or so-called medical kidnapping or child trafficking.
3. Revenue you have received from any Defendant or provided to any Defendant.
4. Revenue You have received from, or provided to, Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Power Marketing Consultants LLC.
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9. All documents or communications relating to the events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

Case # CV01-22-06789 - St Lukes Health System LTD, St Lukes Reg

Envelope Information

Envelope Id
6082219

Submitted Date
5/5/2023 3:26 PM MST

Submitted User Name
cmcarvalho@hollandhart.com

Case Information

Location
Ada County District Court

Category
Civil

Case Type
AA - All Initial District Court Filings (Not Listed In: E, F, and H1)

Case Initiation Date
5/11/2022

Case #
CV01-22-06789

Assigned to Judge
Norton, Lynn G.

Filings

Filing Type
Serve

Filing Code
Service Only


Filing Description
Amended Subpoena for Deposition Duces Tecum of Freedom Tabernacle, Incorporated

Filing Status
Served

Service Document

File Name	Description	Security	Download
Amended Subpoena for Deposition Duces Tecum of Freedom Tabernacle.pdf	Amended Subpoena for Deposition Duces Tecum of Freedom Tabernacle.pdf		Original File Court Copy

eService Details

Status	Name	Firm	Served	Date Opened
 Support	Rodriguez	Individual	Yes	5/5/2023 5:39 PM MST

Status	Name	Firm	Served	Date Opened
Sent	Boise Intake Team	Holland & Hart LLP	Yes	5/8/2023 11:20 AM MST
Sent	Erik Stidham	Holland & Hart LLP	Yes	Not Opened
Sent	Jennifer Jensen	Holland & Hart LLP	Yes	Not Opened
Sent	Zack McCraney	Holland & Hart LLP	Yes	Not Opened

Filing Type

Serve

Filing Code

Service Only

Filing Description

Amended Subpoena for Deposition Duces
Tecum of Power Marketing Consultants
LLC

Filing Status

Served

Service Document

File Name	Description	Security	Download
Amended Subpoena for Deposition Duces Tecum of Power Marketing Consultants.pdf	Amended Subpoena for Deposition Duces Tecum of Power Marketing Consultants.pdf		Original File Court Copy

eService Details

Status	Name	Firm	Served	Date Opened
Sent	Boise Intake Team	Holland & Hart LLP	Yes	5/8/2023 11:21 AM MST
Sent	Erik Stidham	Holland & Hart LLP	Yes	Not Opened
Sent	Jennifer Jensen	Holland & Hart LLP	Yes	Not Opened
Sent	Zack McCraney	Holland & Hart LLP	Yes	Not Opened
Sent	Diego Rodriguez	Individual	Yes	5/5/2023 5:39 PM MST

Filing Type

EFileAndServe

Filing Code

Notice

Filing Description

of Intent to Service Subpoena for
Deposition Duces Tecum to Marissa
Anderson

Filing Status

Accepted

Accepted Date

5/8/2023 8:35 AM MST

Lead Document

File Name	Description	Security	Download
Notice of Intent to Serve Subpoena DT on Marissa Anderson.pdf	Notice of Intent to Service Subpoena for Deposition Duces Tecum to Marissa Anderson	Public	Original File Court Copy

eService Details

Status	Name	Firm	Served	Date Opened
Sent	Jennifer Jensen	Holland & Hart LLP	Yes	Not Opened
Sent	Zack McCraney	Holland & Hart LLP	Yes	Not Opened
Sent	Erik Stidham	Holland & Hart LLP	Yes	Not Opened
Sent	Boise Intake Team	Holland & Hart LLP	Yes	5/8/2023 11:21 AM MST
Sent	Diego Rodriguez	Individual	Yes	5/5/2023 5:38 PM MST

Filing Type

EFileAndServe

Filing Code

Notice

Filing Description

of Intent to Serve Subpoena for
Deposition Duces Tecum to Levi
Anderson

Filing Status

Accepted

Accepted Date

5/8/2023 8:35 AM MST

Lead Document

File Name	Description	Security	Download
Notice of Intent to Serve Subpoena DT on Levi Anderson.pdf	Notice of Intent to Serve Subpoena for Deposition	Public	Original File Court Copy

Duces Tecum to Levi
Anderson

eService Details

Status	Name	Firm	Served	Date Opened
Sent	Zack McCraney	Holland & Hart LLP	Yes	Not Opened
Sent	Jennifer Jensen	Holland & Hart LLP	Yes	Not Opened
Sent	Erik Stidham	Holland & Hart LLP	Yes	Not Opened
Sent	Boise Intake Team	Holland & Hart LLP	Yes	5/8/2023 11:22 AM MST
Sent	Diego Rodriguez	Individual	Yes	5/5/2023 5:38 PM MST

Parties with No eService

Name
Chris Roth

Address

Name
Natasha D Erickson

Address

Name
Ammon Bundy

Address

Name
Ammon Bundy for Governor

Address

Name
Freedom Man PAC

Address

Name
Peoples Rights Network

Address

Name
Freedom Man Press LLC

Address

Name
St Lukes Health System LTD

Address

Name
Tracy W Jungman

Address

Name
Ada County Prosecutors Office

Address

Name
Kyle Bringhurst

Address

Fees

Service Only

Description	Amount
Filing Fee	\$0.00
Filing Total: \$0.00	

Service Only

Description	Amount
Filing Fee	\$0.00
Filing Total: \$0.00	

Notice

Description	Amount
Filing Fee	\$0.00
Filing Total: \$0.00	

Notice

Description	Amount
Filing Fee	\$0.00
Filing Total: \$0.00	

Total Filing Fee	\$0.00
Envelope Total: \$0.00	

Transaction Amount	\$0.00
Transaction Id	8037138
Filing Attorney	Erik Stidham
Transaction Response	Authorized

Order Id

Exhibit K

From: Erik Stidham
Sent: Tuesday, January 3, 2023 1:24 PM
To: Freedom Man Press <freedommanpress@protonmail.com>
Subject: RE: St. Luke's v. Bundy

Mr. Rodriguez,

Please respond. We need to get discovery responses and take your deposition. We will raise your failure to respond with the Court.

Further, you have a duty to retain all relevant communications, including, but not limited to, all communications and transactions with Mr. Bundy, the Bundy Campaign, PRN, and Idaho Dispatch. This includes, but is not limited to, the monies that are being funneled through the Freedom Tabernacle to PRN and to yourself. These documents need to be produced in response to my clients' discovery requests.

Regards,

Erik Stidham

He / Him / His (What's this?)

Partner, Holland & Hart LLP

efstidham@hollandhart.com | T: (208) 383-3934 |

CONFIDENTIALITY NOTICE: This message is confidential and may be privileged. If you believe that this email has been sent to you in error, please reply to the sender that you received the message in error; then please delete this email.

From: Erik Stidham <efstidham@hollandhart.com>
Sent: Wednesday, December 21, 2022 11:48 AM
To: Freedom Man Press <freedommanpress@protonmail.com>
Subject: St. Luke's v. Bundy

Mr. Rodriguez,

We are not waiving anything relating to the relief we seek in the motion to compel. But as a practical matter you have delayed your deposition, that is the reality.

You stated that are available 1/10 for your deposition but stated you refuse to be deposed in person and are limiting the time for your deposition. Again, we have a right to depose you in person and you cannot unilaterally limit your deposition.

I ask again that you stop the games. Please advise where you will be on 1/10-11. We will depose you wherever you will be.

We need a prompt response as we need to arrange flights and, if needed, coordinate with a firm in Mexico.

Erik Stidham

Get [Outlook for iOS](#)

From: efstidham@hollandhart.com <efstidham@hollandhart.com>
Sent: Sunday, January 8, 2023 7:36:52 AM
To: Freedom Man Press <freedommanpress@protonmail.com>
Subject: Fwd: St. Luke's v. Bundy-Deposition on January 10-11.

Mr. Rodriguez,

Within hours, we will be ptraveling to Orlando for your deposition. We expect you to show up at the noticed location at the time designated.

Without waiving any relief or fees that my clients are entitled to recover owing to your failure to comply with discovery obligations, I hope you reconsider your refusal to provide responsive documents. If you bring responsive documents to your deposition, that may mitigate somewhat the delays and costs you have wrongly caused.

Erik Stidham

Get [Outlook for iOS](#)

From: Erik Stidham <EFStidham@hollandhart.com>
Sent: Friday, January 6, 2023 12:14
To: Freedom Man Press <freedommanpress@protonmail.com>
Subject: RE: St. Luke's v. Bundy-Deposition on January 10-11.

Mr. Rodriguez,

We made repeated efforts to coordinate your deposition. You have not responded. We properly noticed your deposition for January 10-11 in Orlando. You have not moved for a protective order.

We have purchased plane tickets and arranged for hotel accommodations. We board a flight on Sunday evening to Orlando. We expect you to show up at the noticed time and place. If you fail to show up, we will seek sanctions, including but not limited to the costs of travel and court reporter fees.

Note that we fully expect the deposition to last two days given the scope of the case and your ongoing wrongful conduct. Further, there will no doubt be follow-on depositions given your failure to comply with discovery obligations. Given the delays you have caused owing to your refusal to act professionally in response to our attempts to coordinate the litigation, we have to proceed.

Regards,

Erik Stidham

He / Him / His (What's this?)

Partner, Holland & Hart LLP

efstidham@hollandhart.com | T: (208) 383-3934 |

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From: Erik Stidham
Sent: Tuesday, January 3, 2023 1:24 PM
To: Freedom Man Press <freedommanpress@protonmail.com>
Subject: RE: St. Luke's v. Bundy

Mr. Rodriguez,

Please respond. We need to get discovery responses and take your deposition. We will raise your failure to respond with the Court.

Further, you have a duty to retain all relevant communications, including, but not limited to, all communications and transactions with Mr. Bundy, the Bundy Campaign, PRN, and Idaho Dispatch. This includes, but is not limited to, the monies that are being funneled through the Freedom Tabernacle to PRN and to yourself. These documents need to be produced in response to my clients' discovery requests.

Regards,

Erik Stidham

He / Him / His (What's this?)

Partner, Holland & Hart LLP

efstidham@hollandhart.com | T: (208) 383-3934 |

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From: Erik Stidham <efstidham@hollandhart.com>
Sent: Wednesday, December 21, 2022 11:48 AM
To: Freedom Man Press <freedommanpress@protonmail.com>
Subject: St. Luke's v. Bundy

Mr. Rodriguez,

We are not waiving anything relating to the relief we seek in the motion to compel. But as a practical matter you have delayed your deposition, that is the reality.

You stated that are available 1/10 for your deposition but stated you refuse to be deposed in person and are limiting the time for your deposition. Again, we have a right to depose you in person and you cannot unilaterally limit your deposition.

I ask again that you stop the games. Please advise where you will be on 1/10-11. We will depose you wherever you will be.

We need a prompt response as we need to arrange flights and, if needed, coordinate with a firm in Mexico.

Erik Stidham

Get [Outlook for iOS](#)

From: Freedom Man Press <freedommanpress@protonmail.com>
Sent: Wednesday, February 22, 2023 9:48 AM
To: Erik Stidham
Subject: RE: Deposition Dates Moving to compel and seek sanctions

External Email

Oh my, Erik He/Him/His Stidham! I guess I didn't realize that I should have provided **TWO** date options and I only provided **ONE**. I'm so sorry that you got your panties all twisted in a knot over that one.

So I have reviewed the order again and see that it plainly reads, *"IT IS HEREBY ALSO ORDERED THAT Diego Rodriguez must sit for an in-person two- day deposition that will be two consecutive days. Diego Rodriguez is required to inform Plaintiffs' counsel, Erik Stidham, of two possible start dates for this deposition that are between February 25, 2023 and March 25, 2023 by 12:00 p.m. on February 15, 2023. Diego Rodriguez must inform Plaintiffs' counsel in what city, state, and country that he will be in on those provided dates. Plaintiffs' counsel will then choose one of those start dates. These communications must be conducted by email so there is a record of the discussion."*

So what we find YET AGAIN, is that Erik He/Him/His Stidham is either an intentional and/or compulsive liar, or is just a psychopath and has no recognition of what is true or false and just spews out lies according to whatever he feels. But fear not, I have a running record and account of all of your obvious and intentional lies. And it will be filed with the appropriate authorities (i.e. the BAR) and justice will eventually be done. Your evil and wicked deeds can't go on forever, Erik He/Him/His Stidham.

You plainly stated below, "You violated a court order yet again" when I certainly did not. I provided you with an option and I let you what city, state, and country I would be in which is exactly what the order demanded. I certainly now recognize that I overlooked the request to provide TWO dates, but I'll provide them to you now. However, your contention about me being in Brazil is not a violation in any way as I am informing you of the City, State, and Country where I will be—which is what the order demanded. There were not any requirements put on the location nor can any court deprive me of my freedom to travel, particularly as someone who is a legal resident outside the United States. If you don't have any He/Him/His friends who will host you there in Brazil, then we can have the deposition over Zoom like we did last time. It's as simple as that.

If the Brazilian authorities arrest you based on what you have written below, well then we should just consider that JUSTICE for all of your lies, corruption, and wickedness. But rest assured, your He/Him/His contemporaries will take good care of you in a Brazilian jail.

So here, you've got your dates. Pick one:

March 22nd & 23rd
March 24th & 25th
Curitiba, Paraná, Brazil

Diego Rodriguez
Freedom Man Press

----- Original Message -----

On Friday, February 17th, 2023 at 4:51 PM, Erik Stidham <EFStidham@hollandhart.com> wrote:

Mr. Rodriguez,

You violated a court order yet again. First, you were required to provide two options for two consecutive days of deposition. You did not provide a single, viable option.

Your email below states you will “attempt to make” yourself available in Brazil. As I am confident you were aware when you sent your email, that Brazil is not an option. See <https://travel.state.gov/content/travel/en/legal/Judicial-Assistance-Country-Information/Brazil.html>

Brazil is a party to the [Hague Convention on the Taking of Evidence Abroad in Civil and Commercial Matters](#) and permits depositions or other evidence gathering only with the participation of its court system. Evidence requests may be submitted directly to the [Brazilian Central Authority](#). The United States is not a party to the evidence provisions of the Inter-American Convention on Letters Rogatory and Additional Protocol. **Brazilian authorities do not permit persons, such as American attorneys, to take depositions for use in a court in the United States before a U.S. consular officer, with the assistance of a Brazilian attorney, or in any other manner. Brazilian law views the taking of depositions for use in foreign courts as an act that may be undertaken in Brazil only by Brazilian judicial authorities. The Government of Brazil asserts that, under Brazilian Constitutional Law, only Brazilian judicial authorities are competent to perform acts of a judicial nature in Brazil. Brazil has advised it would deem taking depositions in Brazil by foreign persons to be a violation of Brazil's judicial sovereignty. Such action potentially could result in the arrest, detention, expulsion, or deportation of the American attorney or other American participants.** The United States recognizes the right of judicial sovereignty of foreign governments based on customary international law and practice. It is the State Department's understanding that the Brazilian prohibition on taking depositions by foreign persons extends to telephone or video teleconference depositions initiated from the United States of a witness in Brazil. The U.S. Embassy or Consulates in Brazil could in no way participate in, or otherwise sanction, such a proceeding. The State Department advises U.S. citizens contemplating participation in such a proceeding, without Brazil's concurrence, obtained through diplomatic channels, to consider carefully the possible legal consequences of doing so.

Moreover, we are confident that you are available for deposition in Florida during the period identified by the Court.

My clients will seek appropriate sanctions, including, but not limited to fees and evidentiary sanctions.

Regards,

Erik Stidham

He / Him / His (What's this?)

Partner, Holland & Hart LLP

efstidham@hollandhart.com | T: (208) 383-3934 |

CONFIDENTIALITY NOTICE: This message is confidential and may be privileged. If you believe that this email has been sent to you in error, please reply to the sender that you received the message in error; then please delete this email.

From: Freedom Man Press <freedommanpress@protonmail.com>
Sent: Tuesday, February 14, 2023 10:02 PM
To: Erik Stidham <EFStidham@hollandhart.com>
Subject: Deposition Dates

External Email

Dear Erik He/Him/His Stidham -

I reject the notion of needing 2 days for a deposition to waste time and ask questions that you already know the answer to. It is evident you are simply trying to rack up billable hours in your endless gamesmanship and dishonorable evil actions, sucking St. Luke's dry (and the public from which they take their dollars).

I am not waiving any rights to challenge the order to sit for a two day meaningless deposition, but I nevertheless offer you the following 2 dates where I will attempt to make myself available while I will be working in Curitiba, Paraná, Brazil on March 24th and 25th.

I am sure you will enjoy Brazil and it will give you the chance to fellowship with other He/Him/His friends you can meet there.

Diego Rodriguez

Freedom Man Press

From: Erik Stidham
Sent: Wednesday, March 8, 2023 6:42 PM
To: Freedom Man Press
Subject: DRod Meet and Confer re Power Marketing, Freedom Tabernacle, etc.
Attachments: 2023-01-03 St Luke's Plaintiffs' Subpoena Duces Tecum of Power Marketing Consultants.pdf; 2023-03-08 Meet and Confer Letter - Diego Rodriguez.pdf; 2023-01-03 St Luke's Plaintiffs' Subpoena Duces Tecum of Power Marketing Agency LLC.pdf; 2023-01-03 St Luke's Plaintiffs' Subpoena Duces Tecum of Power Marketing Consultants.pdf

Mr. Rodriguez,

See attached.



Erik Stidham
He / Him / His (What's this?)
Partner
HOLLAND & HART LLP
800 W. Main Street, Suite 1750, Boise, ID 83702
efstidham@hollandhart.com | T: (208) 383-3934 |

CONFIDENTIALITY NOTICE: This message is confidential and may be privileged. If you believe that this email has been sent to you in error, please reply to the sender that you received the message in error; then please delete this email.

Erik F. Stidham (ISB #5483)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com

Counsel for Plaintiffs

**IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA**

ST. LUKE'S HEALTH SYSTEM, LTD; ST.
LUKE'S REGIONAL MEDICAL CENTER,
LTD; CHRIS ROTH, an individual;
NATASHA D. ERICKSON, MD, an
individual; and TRACY W. JUNGMAN, NP,
an individual,

Plaintiffs,

vs.

AMMON BUNDY, an individual; AMMON
BUNDY FOR GOVERNOR, a political
organization; DIEGO RODRIGUEZ, an
individual; FREEDOM MAN PRESS LLC, a
limited liability company; FREEDOM MAN
PAC, a registered political action committee;
and PEOPLE'S RIGHTS NETWORK, a
political organization,

Defendants.

Case No. CV01-22-06789

**SUBPOENA DUCES TECUM OF
POWER MARKETING AGENCY, LLC**

STATE OF IDAHO TO: Power Marketing Agency, LLC
Attn: Miranda Chavoya, Registered Agent
9169 W. State St., Ste. 3177
Boise, ID 83714

YOU ARE COMMANDED:

- to appear in the Court at the place, date, and time specified below to testify in the above case.
- to appear at the place, date, and time specified below to testify at the taking of a videotaped deposition in the above case. **See Exhibit A.**

PLACE: Holland & Hart LLP
800 W. Main Street, Suite 1750
Boise, ID 83702

DATE/TIME: February 3, 2023, at 9:30 a.m.

- to produce or permit inspection and copying of the following documents or objects, including electronically stored information, at the place, date, and time specified below. **See Exhibit A.**

PLACE: Holland & Hart LLP
800 W. Main Street, Suite 1750
Boise, ID 83702

DATE/TIME: On or before February 3, 2023, at 9:30 a.m.

- to permit inspection of the following premises at the date and time specified below.

You are further notified that if you fail to appear at the place and time specified above, or to produce or permit copying or inspection as specified above, that you may be held in contempt of court and that the aggrieved party may recover from you the sum of \$100 and all damages which the party may sustain by your failure to comply with this subpoena.

DATED: January 3, 2023.

HOLLAND & HART LLP

By: /s/ Erik F. Stidham

Erik F. Stidham

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of January, 2023, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Ammon Bundy for Governor
P.O. Box 370
Emmett, ID 83617

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Ammon Bundy for Governor
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

People’s Rights Network
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

People’s Rights Network
c/o Ammon Bundy
P.O. Box 370
Emmett, ID 83617

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Freedom Man Press LLC
c/o Diego Rodriguez
1317 Edgewater Dr. #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Freedom Man Press LLC
c/o Diego Rodriguez
9169 W. State St., Ste. 3177
Boise, ID 83714

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Freedom Man PAC
c/o Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

Tucker & Associates Court Reporting

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:
freedommanpress@protonmail.com

notice@etucker.net

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

20585401_v1

EXHIBIT A

Power Marketing Agency, LLC

DEFINITIONS AND INSTRUCTIONS

Unless otherwise indicated, the following definitions shall apply to these discovery requests:

A. “You,” “your,” or “yours,” shall mean Power Marketing Agency, LLC, and any person acting or purporting to act on its behalf, including without limitation, all present and former agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

B. “Defendants” shall mean Ammon Bundy; Ammon Bundy for Governor; Diego Rodriguez; Freedom Man Press LLC; Freedom Man PAC; and People’s Rights Network; and any person acting or purporting to act on their behalf, including without limitation, all present and former officers, directors, employees, agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

C. The words “and,” “and/or,” “or” shall each be deemed to refer to both their conjunctive and disjunctive meanings, being construed as necessary to bring within the scope of the discovery request all information and documents which would otherwise be construed as being outside the request.

D. The term “communication” shall mean every manner of transmitting or receiving facts, information, opinions, or thoughts from one person to another person, whether orally, by documents, writing, email, or copy thereof, and to words transmitted by telephone, radio, or any method of voice recording.

E. The term “document” or “documents” shall mean the original, all copies and drafts of papers and writings of every kind, description and form, whether handwritten or typed, and all mechanical, magnetic media and electronic recordings, records and data of every kind, description and form, and all photographs of every kind, and including, without limiting the generality of the foregoing, the following: correspondence, letters, notes, e-mails, computer files, memoranda, reports, notebooks, binders, drawings, studies, analyses, drafts, diaries, calendars, datebooks, appointment books, day-timers, intra- or inter-office communications, canceled checks, minutes, bulletins, circulars, pamphlets, instructions, work assignments, messages (including reports, notes and memoranda of telephone conversations and conferences), telephone statements, calendar and diary entries, desk calendars, appointment books, job or transaction files, books of account, ledgers, bank statements, promissory notes, invoices, charge slips, working papers, graphs, charts, evaluation or appraisal reports, pleadings, transcripts of testimony or other documents filed or prepared in connection with any court or agency or other proceeding, contracts, agreements, assignments, instruments, charges, opinions, official statements, prospectuses, appraisals, feasibility studies, licenses, leases, invoices, computer printouts or programs, summaries, audio, video or sound recordings, cassette tapes, video recorded, electronic or laser recorded, or photographed information. Documents are to be taken

as including all attachments, enclosures and other documents that are attached to, relate to or refer to such documents. Documents are also to include all electronically stored information (“ESI”) made, maintained, retained, stored, or archived by computer or electronic means in any medium, including but not limited to word processing documents, email, email attachments, databases, spreadsheets, writings, drawings, graphs, photographs, sound recordings, images, data, and data compilations. Documents shall also include prior versions of information, as defined above, as well as all attachments, and shall include information stored on personal digital assistants, cell phones, Blackberries, personal laptop computers, hard drives, portable hard drives, and other similar devices.

F. “Person” shall mean any natural person and any other cognizable entity, including but not limited to corporations, proprietorships, partnerships, joint ventures, consortiums, clubs, associations, foundations, governmental agencies or instrumentalities, societies and orders, as well as any agents and employees thereof.

G. The words “relate to” or “relating to” means concerning, referring to, pertaining to, consisting of, containing, describing, involving, comparing, correlating, comparing, mentioning, discussing, evidencing, or having any logical or factual connection with the subject matter dealt with or alluded to the subparagraphs of these Requests.

TOPICS AND DOCUMENTS

Pursuant to Idaho Rule of Civil Procedure 30(b)(6), You are required to designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on Your behalf, regarding the topics described below. The person or persons designated must testify about information known or reasonably available to the organization. The definitions provided above apply to the deposition topics.

Topics:

1. The services You have provided to any Defendant.
2. The services You offer or provide, or have offered or provided, relating to child protective services or so-called medical kidnapping or child trafficking.
3. Revenue you have received from any Defendant or provided to any Defendant.
4. Revenue You have received from, or provided to, Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Consultants LLC, or Freedom Tabernacle, Incorporated.
5. The relationship between You and each of the Defendants.

6. The relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.
7. The events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

Please produce the following documents. The definitions provided above apply to these document requests:

Documents:

1. All documents and communications relating to any service You have provided to any Defendant.
2. All documents and communications relating to any service You offer or provide, or have offered or provided, relating to child protective services or so-called medical kidnapping or child trafficking.
3. All documents and communications reflecting or referring to any payment made by You to any Defendant.
4. All documents and communications reflecting or referring to any payment made to You by any Defendant.
5. All documents and communications reflecting or referring to any payment made by You to Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Consultants LLC, or Freedom Tabernacle, Incorporated.
6. All documents and communications reflecting or referring to any payment made to You by Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Consultants LLC, or Freedom Tabernacle, Incorporated.
7. All documents and communications relating to the relationship between You and each of the Defendants.
8. All documents and communications relating to the relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.
9. All documents or communications relating to the events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

Erik F. Stidham (ISB #5483)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com

Counsel for Plaintiffs

**IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA**

<p>ST. LUKE'S HEALTH SYSTEM, LTD; ST. LUKE'S REGIONAL MEDICAL CENTER, LTD; CHRIS ROTH, an individual; NATASHA D. ERICKSON, MD, an individual; and TRACY W. JUNGMAN, NP, an individual,</p> <p>Plaintiffs,</p> <p>vs.</p> <p>AMMON BUNDY, an individual; AMMON BUNDY FOR GOVERNOR, a political organization; DIEGO RODRIGUEZ, an individual; FREEDOM MAN PRESS LLC, a limited liability company; FREEDOM MAN PAC, a registered political action committee; and PEOPLE'S RIGHTS NETWORK, a political organization,</p> <p>Defendants.</p>	<p>Case No. CV01-22-06789</p> <p>SUBPOENA DUCES TECUM OF POWER MARKETING CONSULTANTS LLC</p>
---	---

STATE OF IDAHO TO: Power Marketing Consultants LLC
Attn: Diego Rodriguez, Registered Agent
1876 E. Adelaide Dr.
Meridian, ID 83642

YOU ARE COMMANDED:

- to appear in the Court at the place, date, and time specified below to testify in the above case.
- to appear at the place, date, and time specified below to testify at the taking of a videotaped deposition in the above case. **See Exhibit A.**

PLACE: Holland & Hart LLP
800 W. Main Street, Suite 1750
Boise, ID 83702

DATE/TIME: February 3, 2023, at 1:30 p.m.

- to produce or permit inspection and copying of the following documents or objects, including electronically stored information, at the place, date, and time specified below. **See Exhibit A.**

PLACE: Holland & Hart LLP
800 W. Main Street, Suite 1750
Boise, ID 83702

DATE/TIME: On or before February 3, 2023, at 1:30 p.m.

- to permit inspection of the following premises at the date and time specified below.

You are further notified that if you fail to appear at the place and time specified above, or to produce or permit copying or inspection as specified above, that you may be held in contempt of court and that the aggrieved party may recover from you the sum of \$100 and all damages which the party may sustain by your failure to comply with this subpoena.

DATED: January 3, 2023.

HOLLAND & HART LLP

By: /s/Erik F. Stidham

Erik F. Stidham

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of January, 2023, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Ammon Bundy for Governor P.O. Box 370 Emmett, ID 83617	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
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Ammon Bundy for Governor c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
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Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
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People's Rights Network c/o Ammon Bundy 4615 Harvest Ln. Emmett, ID 83617-3601	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
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People's Rights Network c/o Ammon Bundy P.O. Box 370 Emmett, ID 83617	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
--	--

Freedom Man Press LLC c/o Diego Rodriguez 1317 Edgewater Dr. #5077 Orlando, FL 32804	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
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Freedom Man Press LLC c/o Diego Rodriguez 9169 W. State St., Ste. 3177 Boise, ID 83714	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
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Freedom Man PAC c/o Diego Rodriguez 1317 Edgewater Dr., #5077 Orlando, FL 32804	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
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Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:
freedommanpress@protonmail.com

Tucker & Associates Court Reporting

notice@etucker.net

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

20586009_v1

EXHIBIT A

Power Marketing Consultants LLC

DEFINITIONS AND INSTRUCTIONS

Unless otherwise indicated, the following definitions shall apply to these discovery requests:

A. “You,” “your,” or “yours,” shall mean Power Marketing Consultants LLC, and any person acting or purporting to act on its behalf, including without limitation, all present and former agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

B. “Defendants” shall mean Ammon Bundy; Ammon Bundy for Governor; Diego Rodriguez; Freedom Man Press LLC; Freedom Man PAC; and People’s Rights Network; and any person acting or purporting to act on their behalf, including without limitation, all present and former officers, directors, employees, agents, representatives, personnel, attorneys, accountants, consultants, experts, investigators or other persons.

C. The words “and,” “and/or,” “or” shall each be deemed to refer to both their conjunctive and disjunctive meanings, being construed as necessary to bring within the scope of the discovery request all information and documents which would otherwise be construed as being outside the request.

D. The term “communication” shall mean every manner of transmitting or receiving facts, information, opinions, or thoughts from one person to another person, whether orally, by documents, writing, email, or copy thereof, and to words transmitted by telephone, radio, or any method of voice recording.

E. The term “document” or “documents” shall mean the original, all copies and drafts of papers and writings of every kind, description and form, whether handwritten or typed, and all mechanical, magnetic media and electronic recordings, records and data of every kind, description and form, and all photographs of every kind, and including, without limiting the generality of the foregoing, the following: correspondence, letters, notes, e-mails, computer files, memoranda, reports, notebooks, binders, drawings, studies, analyses, drafts, diaries, calendars, datebooks, appointment books, day-timers, intra- or inter-office communications, canceled checks, minutes, bulletins, circulars, pamphlets, instructions, work assignments, messages (including reports, notes and memoranda of telephone conversations and conferences), telephone statements, calendar and diary entries, desk calendars, appointment books, job or transaction files, books of account, ledgers, bank statements, promissory notes, invoices, charge slips, working papers, graphs, charts, evaluation or appraisal reports, pleadings, transcripts of testimony or other documents filed or prepared in connection with any court or agency or other proceeding, contracts, agreements, assignments, instruments, charges, opinions, official statements, prospectuses, appraisals, feasibility studies, licenses, leases, invoices, computer printouts or programs, summaries, audio, video or sound recordings, cassette tapes, video recorded, electronic or laser recorded, or photographed information. Documents are to be taken

as including all attachments, enclosures and other documents that are attached to, relate to or refer to such documents. Documents are also to include all electronically stored information (“ESI”) made, maintained, retained, stored, or archived by computer or electronic means in any medium, including but not limited to word processing documents, email, email attachments, databases, spreadsheets, writings, drawings, graphs, photographs, sound recordings, images, data, and data compilations. Documents shall also include prior versions of information, as defined above, as well as all attachments, and shall include information stored on personal digital assistants, cell phones, Blackberries, personal laptop computers, hard drives, portable hard drives, and other similar devices.

F. “Person” shall mean any natural person and any other cognizable entity, including but not limited to corporations, proprietorships, partnerships, joint ventures, consortiums, clubs, associations, foundations, governmental agencies or instrumentalities, societies and orders, as well as any agents and employees thereof.

G. The words “relate to” or “relating to” means concerning, referring to, pertaining to, consisting of, containing, describing, involving, comparing, correlating, comparing, mentioning, discussing, evidencing, or having any logical or factual connection with the subject matter dealt with or alluded to the subparagraphs of these Requests.

Pursuant to Idaho Rule of Civil Procedure 30(b)(6), You are required to designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on Your behalf, regarding the topics described below. The person or persons designated must testify about information known or reasonably available to the organization. The definitions provided above apply to the deposition topics.

Topics:

1. The services You have provided to any Defendant.
2. The services You offer or provide, or have offered or provided, relating to child protective services or so-called medical kidnapping or child trafficking.
3. Revenue you have received from any Defendant or provided to any Defendant.
4. Revenue You have received from, or provided to, Abish-husbandi Inc., Dono Custos, Inc., Power Marketing Agency, LLC, or Freedom Tabernacle, Incorporated.
5. The relationship between You and each of the Defendants.
6. The relationships among the Defendants, including but not limited to their sharing of leadership, networks, messaging, means of communication, and finances.

7. The events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

Please produce the following documents. The definitions provided above apply to these document requests:

Documents:

1. All documents and communications relating to any service You have provided to any Defendant.
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Erik F. Stidham (ISB #5483)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com

Counsel for Plaintiffs

**IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA**

<p>ST. LUKE'S HEALTH SYSTEM, LTD; ST. LUKE'S REGIONAL MEDICAL CENTER, LTD; CHRIS ROTH, an individual; NATASHA D. ERICKSON, MD, an individual; and TRACY W. JUNGMAN, NP, an individual,</p> <p>Plaintiffs,</p> <p>vs.</p> <p>AMMON BUNDY, an individual; AMMON BUNDY FOR GOVERNOR, a political organization; DIEGO RODRIGUEZ, an individual; FREEDOM MAN PRESS LLC, a limited liability company; FREEDOM MAN PAC, a registered political action committee; and PEOPLE'S RIGHTS NETWORK, a political organization,</p> <p>Defendants.</p>	<p>Case No. CV01-22-06789</p> <p>SUBPOENA DUCES TECUM OF POWER MARKETING CONSULTANTS LLC</p>
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STATE OF IDAHO TO: Power Marketing Consultants LLC
Attn: Diego Rodriguez, Registered Agent
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DATED: January 3, 2023.

HOLLAND & HART LLP

By: /s/Erik F. Stidham

Erik F. Stidham
Counsel for Plaintiffs

CERTIFICATE OF SERVICE

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Ammon Bundy for Governor P.O. Box 370 Emmett, ID 83617	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
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Freedom Man Press LLC c/o Diego Rodriguez 1317 Edgewater Dr. #5077 Orlando, FL 32804	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email/iCourt/eServe:
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freedommanpress@protonmail.com

Tucker & Associates Court Reporting

notice@etucker.net

/s/ Erik F. Stidham

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OF HOLLAND & HART LLP

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9. All documents or communications relating to the events surrounding the Idaho Department of Health and Welfare's intervention involving Diego Rodriguez's infant grandson.

March 8, 2023

VIA EMAIL – FREEDOMMANPRESS@PROTONMAIL.COM

Diego Rodriguez
1317 Edgewater Dr. #5077
Orlando, FL 32804

Re: St. Luke's Health System, Ltd., et al. v. Ammon Bundy, et al. - Case No. CV01-22-06789

Dear Mr. Rodriguez:

We write this email in an attempt to meet and confer pursuant to Idaho Rule of Civil Procedure 37(a)(1) regarding Power Marketing Agency, LLC, Power Marketing Consultants LLC, and Freedom Tabernacle, Incorporated's failure to comply with court-issued subpoenas. You are the agent for these entities, and you control these entities so we hope you will engage with us and stop with the gamesmanship and costly delays. The allegations in this lawsuit make clear the relevance of these entities to my clients' theory of the case.

Attached are subpoenas directed to Power Marketing Agency, LLC, Power Marketing Consultants LLC, and Freedom Tabernacle, Incorporated ("Your Entities"). Because Your Entities do not have current physical addresses on file with the Idaho Secretary of State, we served the subpoenas via Certified Mail on January 4, 2023, and provided you notice through iCourt. As you know, the subpoenas commanded Your Entities to appear at Holland & Hart's Boise office for videotaped depositions on February 3, 2023 (for the Power Marketing entities) and February 6, 2023 (for Freedom Tabernacle), and to produce or permit the inspection of certain documents specified in the subpoenas. None of Your Entities contacted Plaintiffs' counsel regarding the subpoenas or sought a protective order, so we proceeded to acquire needed services for, prepare for, and attend the depositions. Your Entities never appeared.

Further, we intend to ask the Court for our attorney fees and costs for Your Entities' failure to comply with the subpoenas. But in an effort to avoid additional motions, we seek to confer on the issue and set dates to depose Your Entities. Please contact me if you and/or Your Entities are willing to confer on this issue. I ask yet again that you cease with the hiding and, instead, act like a person of integrity and fulfill your obligations under the rules of civil procedure. I must note the hypocrisy. NP Jungman and Dr. Erickson had the courage to care for your grandson while they were being falsely attacked and now have the courage to confront your bullying and false statements in a court of law. In contrast, you falsely targeted people and incited violence for self-promotion and now, rather than confront the litigation like a man of integrity, you run away.

You are also on notice of your duty to maintain relevant correspondence and financial information relating to these entities. If you have spoliated any evidence regarding these entities, we will seek sanctions.

We are noticing a hearing on this dispute for April 18, 2023. If Your Entities are not willing to meet and confer, we will be forced to proceed with a hearing on the matter and will seek additional sanctions and costs.

Very truly yours,

/s/Erik F. Stidham

Erik F. Stidham
Partner
of Holland & Hart LLP

EFS:njh

Enclsoures

21055844_v1

From: Erik Stidham
Sent: Thursday, May 11, 2023 7:46 AM
To: Freedom Man Press; Ammon Bundy
Subject: Re: St. Luke's Bundy-Depositions, Spoliation of evidence, false statements at a town hall,

Mr. Bundy and Mr. Rodriguez,

I won't repeat everything that was set out in my email below. But I ask again that you confirm, in writing, that you are refusing to testify and refusing to have a designated representative testify at the depositions that have been set pursuant to court order?

A two-day deposition of Mr. Rodriguez is set to start tomorrow. The Rule 30(b)(6) deposition of PRN is set to start on 5/16. Others follow as noticed.

If you confirm that you are refusing to attend in writing, I can avoid the waste of time and money associated with having a court reporter show up.

Erik Stidham

Get [Outlook for iOS](#)

From: Freedom Man Press <freedommanpress@protonmail.com>
Sent: Thursday, May 11, 2023 00:20
To: Erik Stidham <EFStidham@hollandhart.com>
Subject: Re: St. Luke's Bundy-Depositions, Spoliation of evidence, false statements at a town hall,

External Email

Dear Dirty Erik He/Him/His Stidham -

You're a fag. *I'm inclined to believe you are also a pedophile.* And yes, the first amendment not only protects my right to say that, but my right to believe it.

And while I realize you're a gay little munchkin who can't think straight (because you oppose everything *straight*, both in law and in human affection), you should know that DEFAMATION only exists if what I am saying is BOTH a lie and if I know it to be a LIE and am saying it for some type of personal gain.

In this case, EVERYTHING I've ever said about St. Luke's is true. And I believed it to be true when I said it and I still believe it to be true. So there is no defamation and if you weren't such a gay little fag, you'd also know and recognize it to be true.

And yeah, not only do I know you are a fag, I also know that you're *dirty*. This is why you will forever be known as "Dirty Erik He/Him/His Stidham."

For your information, you should know that I am filing multiple bar grievances against you for several instances in which you perjured yourself in court filings. I will also be filing multiple criminal complaints for violating Idaho Statute § 18-3005 which is INTIMIDATION BY FALSE ASSERTION OF AUTHORITY. You broke the law. You're a criminal. You should go to jail. But since you are part of the corrupt Ada County cabal, we both know you won't go to jail because your butt buddies will ensure you are protected. But you will be bar grieved for your multiple counts of perjury and also for breaking Idaho Statute § 18-3005 when you threatened Garth Gaylord and Robert Jones with

"contempt of court." Anyhow, thanks for doing that because now you will get criminal complaints filed against you. Your own arrogance just gives us more tools to demonstrate your wickedness. It's like they say, "If you give dirty fags enough rope they'll hang themselves." And you have certainly proved that to be true.

So not only will you be bar grieved, but so will all 230+ partners in your law firm. Most likely you will lose your job and you will be disbarred. Of course, if there was justice in Ada County you'd go to jail. You'd probably like it because you would enjoy the company of your He/Him/His buddies.

And after all is said and done, you will go down as the big loser who failed to accomplish anything with the Bundy/Rodriguez/St. Luke's case. **Everyone will know that you used up all of St. Luke's funds and swindled them out of hundreds of thousands, if not millions of dollars, only for St. Lukes's evil to be more greatly highlighted in the community and for more people to recognize their wickedness and to shun them and their services.** You will accomplish nothing other than further exposing your own wickedness along with that of your clients. So congratulations to you for your impotence and incompetence.

And while I have no idea what "Pacer" is, I don't understand why you are so concerned about where I live—after all, **you know better than anybody where I live since I live rent free in your head!**

Diego Rodriguez
Freedom Man Press

----- Original Message -----

On Wednesday, May 10th, 2023 at 8:27 PM, Erik Stidham <EFStidham@hollandhart.com> wrote:

Mr. Bundy and Mr. Rodriguez,

Mr. Bundy again violated a Court order by failing to show up at his deposition noticed for today. We will seek sanctions and fees.

Violation of Court Orders

There are several depositions that have been noticed for the coming days, including, but not limited to, depositions for Mr. Rodriguez, PRN, and the Bundy Campaign. If you fail to attend, we will seek sanctions and fees. Regardless of whether you show up for the depositions, will be seeking sanctions and fees relating to your respective failures to meet the deadlines set by the Court for designating representatives and for providing discovery. Nevertheless, you can limit the waste of time and money associated with having court reporters show up when you have no intention of doing so. I ask that you put in writing, unequivocally, that you are refusing to comply with the Court's discovery orders and will not attend any depositions. If you do that, I can stop having court reporters show up.

Spoliation of Evidence

You have an ongoing obligation to preserve evidence relevant to this dispute. That would include, but is not limited to, all communications relating to this litigation, all statements you make relating to St. Luke's and the other plaintiffs, correspondence you have with other alternative media folks (like Mr. Peters and Mr. Freeman), announcements (public or not) to your followers regarding the litigation, revenues from PRN, and all transactions that you engage in to conceal assets from judgment. This

includes all texts and emails. We have also asked for your cell phone records. We certainly expect you to preserve all records relating to your town hall tonight.

Continuing Defamation

You continue to make false and defamatory statements regarding my clients and to harass and intimidate people covered by the protective order. We expect you are planning on dispensing a whole load of disinformation in the town hall, accompanied with misleadingly edited video. You are on notice that my clients will seek damages for this continuing wrongful conduct. You are warned to refrain from misrepresenting Dr. Thomas's statements regarding transport of the Infant and to cease making misleading statements regarding the medical records. Dr. Thomas has certainly called you out as lying in her recently filed declaration. Dr. Wheaton certainly had done so in his recent declaration. Continuing to publish the lies at the town hall will certainly be presented in relation to punitive damages. The First Amendment does not mean you are not liable for defamation and causing damages.

Federal Case Sign on

Mr. Rodriguez, you appear to have registered for Pacer using a virtual address. I believe you are required to use your actual place of residence.

Regards,



Erik Stidham

He / Him / His [\(What's this?\)](#)

Partner

HOLLAND & HART LLP

800 W. Main Street, Suite 1750, Boise, ID 83702

efstidham@hollandhart.com | T: (208) 383-3934 |

CONFIDENTIALITY NOTICE: This message is confidential and may be privileged. If you believe that this email has been sent to you in error, please reply to the sender that you received the message in error; then please delete this email.

Exhibit L

From: Annie Nice <annienice@etucker.net>
Sent: Monday, May 22, 2023 4:11 PM
To:
Subject: FW: Deposition Tomorrow - Court reporter

External Email

From: Freedom Man Press <freedommanpress@protonmail.com>
Sent: Thursday, May 11, 2023 11:03 AM
To: Annie Nice <annienice@etucker.net>
Subject: Re: Deposition Tomorrow - Court reporter

Annie, you seem like a very nice lady and I appreciate you reaching out.

I am not aware of the deposition tomorrow, unless I got certain dates wrong. But if that is the case, this is just another demonstration of the ridiculous amount of harassment and corruption going on in this case.

Annie, you must know I don't live in Idaho. How ridiculous are these people demanding that I sit for a deposition in Idaho when I live 2,000 miles away and spend much time for work out of the country? They know this and aware of this yet they refuse to have another Zoom deposition even though I've offered to do so many times. Why? Ask yourself why?

Anyhow, tomorrow I will be in Florida, not in Idaho. Next week I'll be out of the country. So NO, there is absolutely no way I will be in Idaho tomorrow.

Diego Rodriguez
Freedom Man Press

----- Original Message -----

On Thursday, May 11th, 2023 at 12:15 PM, Annie Nice <annienice@etucker.net> wrote:

Good Morning Diego,

You probably remember me from the first zoom deposition in the St. Luke's case. We have another deposition scheduled for you Friday and continuing Monday. I am not writing you on behalf of Holland. I am just curious if you are planning to show up tomorrow?

I realize that there is currently litigation going on and you don't need to give me any details but it would help me so much if you could tell me either yes you will be attending or not.

Thank you!



Annie Nice

Scheduling Manager

Billing

Tucker Legal Directory

Phone: 208-850-0489 Mobile: 208-850-0489

PO Box 44385, Boise, ID 83711

Web: www.etucker.net

Check out the NEW Tucker Legal Directory online:

www.tuckerlegaldirectory.com

Features of the new website: <https://youtu.be/4OTZtH-T64k>

From: Annie Nice <annienice@etucker.net>
Sent: Monday, May 22, 2023 4:32 PM
To:
Subject: FW: It's me again....sorry to bother you.

External Email

I didn't get a response from him today. This is what I sent.



Annie Nice

Scheduling Manager

Billing

Tucker Legal Directory

Phone: 208-850-0489 Mobile: 208-850-0489

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Web: www.etucker.net

Check out the **NEW Tucker Legal Directory** online:

www.tuckerlegaldirectory.com

Features of the new website: <https://youtu.be/4OTZtH-T64k>

From: Annie Nice
Sent: Monday, May 22, 2023 11:10 AM
To: freedommanpress@protonmail.com
Subject: It's me again....sorry to bother you.

Diego,

Tomorrow the depositions of Power Marketing Consultants LLC and Power Marketing Agency (Miranda Chavoya) are scheduled. I was wondering if you might confirm with me that you will not be attending? I am asking because I have reserved a court reporter and videographer for tomorrow.

I'm not sure if you know if Miranda is planning on appearing but if there is any way I can confirm with her, I would greatly appreciate it.

Have a great day!



Annie Nice

Scheduling Manager

Billing

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