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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

**DECLARATION OF KATERINA
OBERDIECK TO ESTABLISH
FOUNDATION**

I, Katerina Oberdieck, declare and state as follows:

1. I am a research consultant working as an independent contractor. I make this declaration based on my personal knowledge.

2. I am a research consultant working as an independent contractor. I have a master's degree in psychology. Before becoming an independent contractor, I spent five years as a researcher at Persuasion Strategies, an integrated team of nationally recognized litigation consultants, legal graphics professionals, and video professionals. As a research consultant, I collaborate with trial consultants and attorneys across the country to provide litigation support.

3. I was contracted by Holland & Hart to collect Defendants' and their followers' media appearances, internet posts, and public communications.

4. To collect the data, I regularly monitored Defendant Diego Rodriguez's website, freedomman.org.

5. I reviewed People Against Child Trafficking, P.A.C.T. (Official) Telegram Group ("P.A.C.T. Telegram Group"), a Telegram group that is open to the public but requires a Telegram account to access. As of the date of this declaration, the P.A.C.T. Telegram Group is still accessible online to Telegram subscribers at the following website, <https://t.me/peopleagainstchildtrafficking>.

6. **Trial Exhibit 339** is a true, accurate, and complete copy of a video I downloaded from the P.A.C.T. Telegram Group.

7. On May 10, 2023, Defendant Diego Rodriguez gave an online, publicly accessible live "presentation" that he titled, "Government Subsidized Child Trafficking." This presentation was given via Zoom at the following link,

<https://us02web.zoom.us/j/82888844718?pwd=bytFNzc4bjV0RFBPd3ZaQThpV1Vndz09>. As of the date of this declaration, a replay of that presentation is available on Mr. Rodriguez's

website, freedomman.org. See <https://freedomman.org/video/government-subsidized-child-trafficking/>. The live presentation was followed by a “Q&A” session that was for attendees only, which I recorded. It featured Mr. Rodriguez and Defendant Ammon Bundy. **Trial Exhibit 346** is a true, accurate, and complete copy of my recording of that Q&A session.

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

DATED: July 5, 2023.

Katerina Marie Oberdieck

Katerina Oberdieck

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of July, 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
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:

Ammon Bundy
Ammon Bundy for Governor
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:

Freedom Man PAC
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:

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

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