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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 KRISTEN NATE
TO ESTABLISH FOUNDATION**

I, Kristen Nate, declare and state as follows:

1. I am a Child Welfare Chief for the Idaho Department of Health and Welfare (“DHW”) and a fact witness for this lawsuit. I make this declaration based on my personal knowledge.

2. I am a Child Welfare Chief for DHW. As a Child Welfare Chief, I oversee DHW’s child welfare cases and manage case management supervisors. I oversaw the child welfare case relating to the Infant in this lawsuit.

3. Trial Exhibit 722 are true and correct copies of screenshots I took on my phone of posts appearing on the freedomman.org website. To capture these photos, I opened the Freedom Man website from my web browser on my phone, navigated to the <https://freedomman.org/cyrus/archive/impossibility-of-cps-social-workers-objectivity/> webpage, then took a screenshot of the contents of the page. The screenshots accurately portray what I viewed on the webpage.

4. Trial Exhibit 723 are true and correct copies of photos I took on June 20, 2023, outside of the DHW office located at 1720 Westgate Drive, Ste. D, Boise, ID 83704. I took these photos using my cell phone. These photos accurately represent what I saw on June 20, 2023.

5. Trial Exhibit 724 is a true and correct copy of an Idaho Child Protective Act Flow Chart and Timeline that DHW uses as an aid to describe the child welfare process in the regular course of its business.

6. Trial Exhibit 726 is a true and correct copy of an Advisement of Rights Bench Card created by Idaho Supreme Court to assist judges presiding over a Child Protective Act case.

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.



Kristen Nate

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