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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 STEPHEN
PIGGOTT TO ESTABLISH
FOUNDATION**

I, Stephen Piggott, declare and state as follows:

1. I am the Momentum Program Director at Western States Center. I make this declaration based on my personal knowledge.

2. I am a Program Director at Western States Center, a 501(c)(3) public charity designed to promote justice and equality and defend democracy. I have spent the past fifteen years investigating, monitoring, and exposing extremist organizations. One organization that I've monitored extensively, and that I continue to monitor, is the People's Rights Network.

3. I joined the People's Rights Network's in 2020 in order to investigate the organization and monitor its activities. When I joined People's Rights Network, I was prompted to enter my name, phone number, email address, and state of residence. I signed up using an alias and carefully constructed credentials. Holland & Hart did not ask me to join this group. I joined it in the course of my job duties for Western States Center.

4. I also joined the People Against Child Trafficking, P.A.C.T (Official), Telegram group Holland & Hart did not ask me to join this group. I joined it in the course of my job duties for Western States Center.

5. I also signed up to receive emails from Diego Rodriguez's website, freedomman.org. Holland & Hart did not ask me to join this group. I joined it in the course of my job duties for Western States Center.

6. Because it takes months or years to develop a credible alias and fully infiltrate an extremist organization, I do not want my membership details in any of these groups to become public.

7. I sent Holland & Hart emails, Baby Cyrus Telegram Group screenshots, video alerts, and audio alerts that I received from my membership in the People's Rights Network, the People Against Child Trafficking, P.A.C.T (Official) Telegram group, and freedomman.org.

8. Trial Exhibits 178, 593, 595-597, 598-606, 607-608, 629, 644, and 717 are true, accurate, and authentic copies of records I received from People's Rights Network, the Baby Cyrus Telegram Group, and freedomman.org.

9. Trial Exhibits 178, 644 are true, accurate, and authentic alerts I received from People's Rights Network.

10. Trial Exhibits 597, 605, 606 are true, accurate, and authentic screenshots of the People Against Child Trafficking, P.A.C.T (Official) Telegram group.

11. Trial Exhibits 593, 595, 596, 598-604, 607, 608, 629, 717 are true, accurate, and authentic copies of emails I received from freedomman.org. Holland & Hart has redacted my email address to protect my identity and preserve so I can continue investigating and monitoring the groups.

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

DATED: July 6, 2023.



Stephen Piggott

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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