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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 JENNIFER M.  
JENSEN IN SUPPORT OF  
SUPPLEMENTAL BRIEF RE  
INJUNCTIVE RELIEF**

Jennifer M. Jensen declares and states as follows:

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. Attached hereto as **Exhibit A** is a true and correct copy of a public post harvested from Idaho Dispatch’s Facebook account on July 27, 2023. According to the time stamp, it was posted late on the night of July 26, 2023.

3. The post perpetuates the false narratives found to be defamatory, further evidencing the need for permanent injunctive relief.

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

DATED: July 27, 2023.

By: */s/Jennifer M. Jensen*

Jennifer M. Jensen

## CERTIFICATE OF SERVICE

I hereby certify that on this 27th 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](mailto:freedommanpress@protonmail.com)

/s/ Erik F. Stidham

Erik F. Stidham  
OF HOLLAND & HART LLP

30207970\_v1

# **EXHIBIT A**



# Idaho Dispatch

17K followers • 2 following

Posts About Reels Photos Videos

**Intro**

Your Local Media Ally in Idaho!

- Page - News & media website
- info@idahodispatch.com
- idahodispatch.com
- Rating - 4.6 (16 Reviews)

**Photos** See all photos

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**Idaho Dispatch** 11h

Diego Rodriguez responds to jury awarding millions in damages to St. Luke's.

"Dirty Erik He/Him/His Stidham is a fag who works for LGBTQ+ lovers, Holland and Hart Law firm, who make money by taking payments from Child Traffickers like St. Luke's, who get their money from taxpayers through government payments, and who weaponize America's flawed legal system to destroy anybody who exposes them. But fear not! I will not cease to expose every single bad actor in this process at [FreedomMan.org](#) and [StLukesExposed.com](#)"



FREEDOMMAN.ORG  
**Official Freedom Man Website**  
 Freedom Man Press, where it is our priority to eliminate the scourge...

4 likes, 5 comments, 1 share

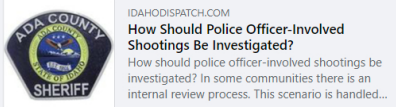
**Doug Gochnour**  
 Idaho Dispatch: Why would you even post this crap? How does it help resolve the situation? How does it show your objectivity? Especially when you have chosen to NOT report the critical sworn trial testimony that clearly shows the world that Diego a... See more

3h

View more comments

**Idaho Dispatch** 23h

How Should Police Officer-Involved Shootings Be Investigated?



1 like, 2 comments

**Jeff Woods**  
 As mentioned in story, there are different agencies that investigates a OIS. Nobody is getting away with anything. Having the general public involved would result in unruly conflict and would serve no purpose.

4h Edited

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**Idaho Dispatch** 1d

Ammon Bundy responds to jury awarding millions in damages to St. Luke's.

"Massive institutions combined with the state, financially benefiting when they take a child is one of the worst combination a parent can imagine. Therefore, to counter, the cost of stealing a baby must be extremely high and good people must assure strong consequences when it occurs. Idaho CPS agents, Meridian police & St. Luke's staff so far have gotten off easy. They may have the means to use the cour... See more

44 likes, 46 comments, 11 shares

**Tom Letz**  
 Nor is using a child with a medical condition to further your political narrative acceptable as well. Remember, you had a choice to have a lawyer or represent yourself. You chose neither. What exactly did you expect to happen? It would have been qu... See more

1d

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**Idaho Dispatch**  
2d · 🌐

The jury has spent the entire day deliberating St. Luke's vs. Ammon Bundy and Diego Rodriguez.

👍👎🗨️ 43

247 🗨️ 5 ➦

👍 Like

🗨️ Comment



**Kathy Nice**  
Such a frivolous lawsuit. Boycott St Pukes!!!!



2d

👍 39

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**Idaho Dispatch**  
3d · 🌐

Judge Nancy Baskin addressed St. Luke's counsel Holland and Hart this morning regarding injunctive relief, "Appreciate some assist on the case law."

Jury is back in deliberation with a new laptop to view the evidence submitted by the plaintiffs in the damages case against Ammon Bundy and Diego Rodriguez.

👍 3

41 🗨️ 3 ➦

👍 Like

🗨️ Comment



**Betsy Ross**  
Regardless if you agree with Bundy or not. What we see St. Luke's doing, with the help of our Judicial system and Law enforcement should be deeply concerning to every American.

This shows you that even when government agencies make unforgivable mistakes... See more

3d

👍👎🗨️ 31

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**Idaho Dispatch**  
4d · 🌐

St. Luke's Hospital Lawsuit Against Ammon Bundy and Diego Rodriguez Now in the Hands of Ada County Jury



IDAHO DISPATCH.COM

St. Luke's Hospital Lawsuit Against Ammon Bundy and Diego Rodriguez Now in the Hands of Ada County Jury

👍👎🗨️ 11

17 🗨️ 3 ➦

👍 Like

🗨️ Comment

➦ Share



**Dave Osuna**  
The fact that St. Luke's/ CPS caved in a matter of days giving baby Cyrus back tells everyone it should never have happened in the first place.

2d

👍 4

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**Idaho Dispatch**  
5d · 🌐

Judge Nancy Baskin releases two alternate jurors from the courthouse in the St. Luke's vs Ammon Bundy and Diego Rodriguez case.

Two females released.

Jury is now in deliberation.

👍👎 19

79 🗨️ 4 ➦

👍 Like

🗨️ Comment



**Jeremy Earhart**  
What a circus. Saint lukes can rip a baby from its parents then get pissed off. When somebody tells everybody about it?

5d

👍👎🗨️ 9

View more comments

**Idaho Dispatch**  
5d · 🌐

St. Luke's rests its case against Ammon Bundy and Diego Rodriguez. Holland and Hart prepares for closing arguments at 2:30 P.M. today, Ada County Courthouse Room 400.

👍👎 41

61 🗨️ 4 ➦

👍 Like

🗨️ Comment



**James Galleguillos**  
Great. Soon we will all see how corrupt the justice system is here in Idaho. Of course the kangaroo Ada County court with its lopsided, biased jury will find them guilty because the judge already has shown a total disregard for due process of the law. ... See more

👍👎🗨️ 11

5d Edited



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Idaho Dispatch 6d

Dennis Reinstein CPA, St. Luke's finance expert testified today in the costs of new security personnel and equipment.

"Total annual impact \$4,630,203

Tasers, Reflex Protect Spray Gel, Body Camera, Bullet Proof Vest, Drone Patrol Program"... See more

34

21 3

Like

Comment



Dave Goodenough

Wow if a couple concerned citizens standing out front costs 4.6 mil imagine what they charge for actual care? Lol this hype is ridiculous, they are just looking for a payout and making up numbers to try to justify it.

6d Edited

16

View more comments

Idaho Dispatch 6d

Dennis Reinstein CPA, St. Luke's finance expert testified today

"Present value of losses and costs

\$49,399,123"... See more

84

88 6

Like

Comment



Paula Mae Taulbee

I love how they don't let the fact out that CPS gave the baby back after the doctors admitted he was healthy and stable! They can't let that truth out because then it would be justifiable for what Ammon and Diego did! Since when is peacefully protestin... See more

4d

13

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Idaho Dispatch 6d

"Examples of Radicalization

Robert Jones violent extremist, NATO Pyramid Model

Bundy made Jones a hero within PRN for his jail time... See more

5

10 3

Like

Comment



Top fan Kris Tea

It speaks volumes to me that this guy Spencer is from Howard University & Berkeley P.D. How much more of a leftist testimony can you get in an expert witness! Those credentials right there, tell me whatever he is saying shouldn't be taken with any weight whatsoever

6d

8

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Idaho Dispatch 6d

Op-Ed: New Federal Lawsuit Poses Grave Threat to Families, Children



IDAHO DISPATCH.COM

Op-Ed: New Federal Lawsuit Poses Grave Threat to Families, Children

7

1 3

Like

Comment

Share



Rena Stavast-Carlson

Praying much! 🙏

6d

Idaho Dispatch 6d

"The systematic doxing and harassment of Chris Roth, Dr. Natasha Erickson, Tracy Jungman and St. Luke's was intended to intimidate and terrorize the plaintiffs."

Spencer Fomby, Howard University Washington D.C., Berkeley P.D. 20 years, St. Luke's expert on extremism testified today in the defamation case against Ammon Bundy and Diego Rodriguez.

7

12 1

Like

Comment



Al Popwell

Anyone think this is designed to keep Ammon out of politics? I seem to think there is another similar thing going on. 🤔

6d

6

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**Idaho Dispatch**  
6d · 🌐

Spencer Fomby, Howard University Washington D.C., Berkeley P.D. 20 years, St. Luke's expert on extremism testified today  
"The disruption of March 15, 2022 posed a serious risk of violence, not a protest."... See more

👍👍 5

1 ↗

👍 Like

💬 Comment

**Idaho Dispatch**  
6d · 🌐

Spencer Fomby, Howard University Washington D.C., Berkeley P.D. 20 years, St. Luke's expert on extremism testified today  
"Ammon Bundy's PRN is an extremist group with a documented history of threatening and violent behavior."  
"Use typical extremist playbook."

👍👍👍 9

6 💬 1 ↗

👍 Like

💬 Comment



👑 Top fan

Kris Tea

St Luke's is showing their true colors. So this looks to me like it's about politics. I don't know Ammon, I know what I've read and it's different from what I've heard on msm news. When you expose a machine like St Luke's for what they are, they w... See more

6d

👍👍 6

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**Idaho Dispatch**  
6d · 🌐

"\$23,171,917 Advertising Value Equivalency, 2.51 billion eyeballs" value and reach of media campaign in regards to Baby Cyrus.  
Jessica Flynn, CEO of Red Sky, expert witness for St.Luke's on public relations and marketing testified today in the defamation case against Ammon Bundy and Diego Rodriguez.

"\$16,775,054 Reputation Campaign: St. Luke's," cost to repair defamation damages.

👍👍👍 26

47 💬 3 ↗

👍 Like

💬 Comment



Kaylee McIlquham

If one guy on social media can take down your \$1.5billion revenue business perhaps that's your own fault not theirs.

6d

👍👍 11

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**Idaho Dispatch**  
6d · 🌐