

Diego Rodriguez
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**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

**ANSWER TO REQUEST FOR
PERMANENT INJUNCTIVE RELIEF**

COMES NOW Defendant Diego Rodriguez (who may refer to myself as “I,” “defendant,” or
“Rodriguez), defendant in the above mentioned case, to response/answer to the Plaintiff’s request
for permanent injunctive relief in which they are requesting the following 4 things:

(1) to cease posting and disseminating defamatory statements against the St. Luke’s Parties;

(2) to cease making statements that the St. Luke's Parties are criminals and/or participate in the kidnapping, trafficking, sexual or any other abuse, and/or killing of children;

(3) to remove from all online locations Defendants have authority to do so any and all statements that the St. Luke's Parties are criminals and/or participating in the kidnapping, trafficking, sexual or any other abuse, and/or killing of children;

(4) to cease disseminating and encouraging others to disseminate the contact information, personal information, and images of Mr. Roth, Dr. Erickson, and NP Jungman.

ARGUMENT

For the court to grant the injunction which the plaintiffs are requesting would be to violate the 1st amendment right of free speech that are afforded to me by the Constitution of the United States of America and likewise by the Idaho State Constitution (although I am not a citizen of the state of Idaho).

Furthermore, since there has never been an evidence based trial as to whether the things I have said are true or not—to force me to remove websites or published material where I have published factually accurate information is to simply muzzle the voice of a whistleblower, which is something that is only done in totalitarian states and tyrannical dictatorships.

I will voluntarily agree to the 1st request which the Plaintiffs have made—most specifically I will not post any defamatory statements about the Plaintiffs, in any medium, anywhere on planet earth, so long as the definition of “defamatory statements” is the one used in Idaho State Law

which is “*A statement known to be false by the person making the statement, or one that the person should reasonably have known to be false.*”

Every statement I have made about St. Luke’s hospital is FACTUALLY TRUE. And even after a year of this frivolous and fraudulent lawsuit, there has still never been an evidence based trial which provided empirical evidence to demonstrate that my statements were false. *First of all, I believe them to be true and have evidence that they are all true.* In fact, the evidence is posted on my website(s).

Additionally, my deep held belief and conviction is enough to obliterate the charge of defamation, because I BELIEVE EVERYTHING THAT SAID IS TRUE. But the fact that the Plaintiffs STILL TO THIS DAY have never provided any of the discovery requests I made which would lead to admissible evidence to demonstrate that all of my claims were in fact, accurate and true, also goes to demonstrate that the Plaintiffs have acted in bad faith and are hiding facts and evidence and are afraid of the evidence being published to the world.

As a reminder, Judge Lynn Norton fraudulently and improperly struck all of my answers from the case and prohibited me from bringing any evidence contrary to the allegations made against me by the Plaintiffs. Therefore, this was not an evidence based trial and everybody involved knows this to be true.

But in the end, if the Plaintiffs can provide evidence that any single thing I have said IS FALSE, I will voluntarily remove that specific inaccurate information from any website I control or any publication I manage and additionally, I will publish an apology and a retraction for the factually inaccurate information that was posted.

However, to the additional 3 requests, I would simply respond:

(2) and (3) to cease making statements that the St. Luke's Parties are criminals and/or participate in the kidnapping, trafficking, sexual or any other abuse, and/or killing of children;

No, I cannot stop publishing this because it is true. St. Luke's Hospital does participate in the *Government Subsidized Child Trafficking Ring* that has been identified. By definition, "child trafficking" is *forcefully taking a child for profit, or kidnapping for profit*. Therefore if anybody is in possession of somebody else's children who were taken by force and they profit from it—they are participants in Child Trafficking.

St. Luke's profited from the kidnapping of my grandson, Baby Cyrus. That is an empirical fact and St. Luke's cannot deny it. They made money by having Baby Cyrus in their possession. That is a fact. By definition therefore, St. Luke's participates in child trafficking and since the money comes from government sources (namely Social Security Title IV and Medicare/Medicaid), then YES, it is government subsidized child trafficking. And you cannot muzzle my mouth and violate my 1st Amendment right by forbidding me from proclaiming THESE FACTS.

Additionally, the claims I have made on my website about St. Luke's killing babies are 100% factual and not disputed by anyone. In fact, the first claim about them killing a baby through medical malpractice is a link to an article from the Idaho Statesman (<https://www.idahostatesman.com/news/local/article41570394.html>) . It is simply a fact that they did so. The second is a video from the father of a baby who was killed by St. Luke's incompetence and medical malpractice, telling his story (<https://stlukesexposed.com/truth-about->

st-lukes/how-st-lukes-killed-a-10-month-old-baby/). These are facts and you cannot prevent me from publishing facts any more than you can prevent the Idaho Statesman from doing so without violating the 1st Amendment.

(4) to cease disseminating and encouraging others to disseminate the contact information, personal information, and images of Mr. Roth, Dr. Erickson, and NP Jungman.

To the extent that these specific defendants have participated in the kidnapping of my grandson, the factually accurate accounts of their actions cannot be removed from public awareness.

Likewise, there has not been a trial of evidence demonstrating that any claims I have made about their actions in regards to the kidnapping of my grandson were false. On the contrary, all of the evidence demonstrates that every statement I have made about them is empirically true. So while I have never posted the personal information for any of these individuals, I have posted their images as the public has a right to know who they are and there are no laws prohibiting the sharing or publishing of images of people who have been involved in a very public story and whose actions were remarkably unconscionable.

CONCLUSION

The granting of a permanent injunction against my ability to publish factually accurate information about the Plaintiffs in this case is a violation of my 1st amendment rights. The court cannot and must not muzzle the mouths of those who bring truth to light and who publish facts about cases and issues of public and even national importance. I ask that the court obey the law and the US Constitution along with the Idaho State Constitution and uphold my right of freedom of speech, regardless of how uncomfortable it may make the defendants. If they want me to

remove factually inaccurate information, I have already agreed to do so. But they cannot ask me to remove factually accurate information, or information I wholeheartedly believe to be true, without violating one of the most fundamentally cherished rights (the right of Freedom of Speech) in our country.

DATED: July 28th, 2023

By: /s/ Diego Rodriguez

Diego Rodriguez

CERTIFICATE OF SERVICE

I certify I served a copy to: (name all parties or their attorneys in the case, other than yourself)

Erik F. Stidham (ISB #5483)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974

☐ By Mail

☐ By fax

☒ By Email/iCourt/eServe

DATED: July 28th, 2023

By: /s/ Diego Rodriguez

Diego Rodriguez