

September 13, 2023

Diego Rodriguez
1317 Edgewater Drive, #5077
Orlando, FL 32804

**Re: *St. Luke's et al. v. Ammon Bundy et al.*
Violations of Permanent Injunction**

Dear Mr. Rodriguez:

I write regarding your continued violation of the Court's Findings of Fact, Conclusions of Law and Order for Injunctive Relief, which was issued on August 25, 2023 ("August 25 Order"), and the Court's Default Judgment Order, which was issued on August 29, 2023 ("August 29 Order"). The Court's clerk served you with these Orders on August 25 and August 29, respectfully. The Orders are enclosed.

In its orders, the Court directs you to cease posting and disseminating specific statements, to remove unlawful content from the internet, and to deactivate unlawful links. *See* August 25 Order at 36-39; August 29 Order at 3-6.

Those orders state:

Defendants must:

1. Cease posting and disseminating defamatory statements against all Plaintiffs.
2. Cease making statements that any of the Plaintiffs are criminals and/or are participating in unlawful kidnapping, trafficking, sexual or any other abuse, and/or killing of children.
3. Remove from all online locations or websites Defendants have authority to do so any and all statements that the Plaintiffs are criminals and/or participating in the kidnapping, trafficking, sexual or any other abuse, and/or killing of children.
4. Cease disseminating and encouraging others to disseminate the contact information, personal information, and images of Mr. Roth, Dr. Erickson, and NP Jungman.
5. Remove from all online locations and websites Defendants have authority to do so the contact information, personal information, and/or images of Mr. Roth, Dr. Erickson, and NP Jungman.

6. Deactivate links on other websites where Defendants or their agents posted links to defamatory statements or statements that invade the privacy of the Plaintiffs by portraying them in a false light.

August 25 Order at 37.

Defendants Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People's Rights Network are PERMANENTLY ENJOINED as follows:

- a. Defendants must cease posting and disseminating defamatory statements against all Plaintiffs. Defamatory statements include:
 - i. The Infant was perfectly healthy when taken by Child Protective Services.
 - ii. St. Luke's made the Infant sick and infected the Infant with disease.
 - iii. The Infant was kidnapped or unlawfully taken by law enforcement or St. Luke's.
 - iv. St. Luke's, St. Luke's management, law enforcement, Idaho Department of Health and Welfare, the courts, and medical practitioners are all involved in a conspiracy to engage in criminal child trafficking, kidnapping children and stealing children to make money.
 - v. The medical providers are pedophiles who want to abuse children and engage in child trafficking.
 - vi. Idaho Department of Health and Welfare makes more money for every child it takes into Child Protective Services custody and that is why the Idaho Department of Health and Welfare kidnaps and traffics children and only allows certain people with a specific sexual orientation to adopt children.
 - vii. St. Luke's and the medical practitioners intentionally or negligently harmed or injured the Infant, committed medical malpractice and/or misdiagnosed the Infant.
 - viii. St. Luke's reported the parents to Child Protective Services.
 - ix. Dr. Erickson threatened to file a report with Child Protective Services if the parents did not agree to the treatment plan between March 1-4, 2022.
 - x. St. Luke's intentionally kept the Infant longer than necessary in the hospital because the parents did not want the Infant vaccinated.
 - xi. The family was discriminated against because the Infant was not vaccinated.
 - xii. The parents have thousands of dollars in medical bills they have to pay based on the care provided by St. Luke's or any medical provider.
 - xiii. The parents did not consent to the medical treatment provided to the Infant.

- xiv. The Infant was released from the St. Luke's Children's Hospital and returned directly to the family due to the protesters' or Defendants' actions.
- b. Defendants must cease making statements that any of the Plaintiffs are criminals and/or are participating in unlawful child kidnapping, child trafficking, child sexual or any other child abuse, and/or killing of children.
- c. Defendants must remove from all online locations or websites Defendants have authority to do so any and all statements that the Plaintiffs are criminals and/or participating in the child kidnapping, child trafficking, child sexual or any other child abuse, and/or killing of children. The online locations include, but are not limited to, the following websites including their sub-pages:
<https://www.peoplesrights.org>, <https://www.votebundy.com>,
<https://www.freedomman.org>, <https://stlukesexposed.com>,
<https://www.facebook.com/SaveBabvCyrus/>,
<https://www.youtube.com/@RealAmmonBundy>, <https://twitter.com>
(handle @RealABundy), <https://x.com> (handle @RealABundy),
https://www.givesendgo.com/GAZAG?utm_source=sharelink&utm_medium=copy_link&utm_campaign=GAZAG
- d. Defendants must cease disseminating and encouraging others to disseminate the contact information, personal information, and images of Mr. Roth, Dr. Erickson, and NP Jungman.
- e. Defendants must remove from all online locations and websites Defendants have authority to do so the contact information, personal information, and/or images of Mr. Roth, Dr. Erickson, and NP Jungman. The online locations include, but are not limited to, the following websites including their sub-pages:
<https://www.peoplesrights.org>, <https://www.votebundy.com>,
<https://www.freedomman.org>, <https://stlukesexposed.com>,
<https://www.facebook.com/SaveBabvCyrus/>,
<https://www.youtube.com/@RealAmmonBundy>, <https://twitter.com>
(handle @RealABundy), <https://x.com> (handle @RealABundy),
https://www.givesendgo.com/GAZAG?utm_source=sharelink&utm_medium=copy_link&utm_campaign=GAZAG
- f. Defendants must deactivate links to defamatory statements or statements that invade the privacy of the Plaintiffs by portraying them in a false light.

August 29 Order at 3-6.

The Court warned that your failure to comply “may lead to contempt proceedings, sanctions and other legal ramifications.” August 29 Order at 37. Yet as of the date of this letter, you have refused to comply.

Your unlawful conduct continues to cause daily, irreparable harm to my clients. It also harms our community and makes our communities less safe. *See* August 25 Order. Accordingly, my clients hereby demand that you cease and desist from your unlawful conduct, that you remove the unlawful content from the internet, and that you deactivate the links as mandated in the Court's orders.

A non-exhaustive list of examples of your unlawful content that must be removed and/or deactivated includes:

- All webpages that violate the Permanent Injunction order that begin with the <https://freedomman.org/cyrus/>
- <https://www.freedomman.org/video/government-subsidized-child-trafficking/>
- <https://www.freedomman.org/2022/my-response-to-the-idaho-statesman-st-lukes-lawsuit/>
- <https://www.freedomman.org/2023/judge-lynn-norton-and-erik-stidham-just-gag-ordered-me/>
- <https://www.freedomman.org/2023/facts-about-ammons-contempt-of-court-charge/>
- <https://www.freedomman.org/2023/judge-lynn-norton-just-intentionally-broke-the-law-proving-that-she-is-biased/>
- <https://www.freedomman.org/2023/idaho-department-of-health-and-welfare-is-the-bad-guy/>
- <https://www.freedomman.org/cyrus/archive/baby-cyrus-was-kidnapped-one-year-ago/>
- <https://www.freedomman.org/2023/diego-rodriguez-issues-challenge-to-st-lukes-and-erik-stidham/>
- <https://www.freedomman.org/2022/st-lukes-is-suing-us-for-exposing-them/>
- <https://www.freedomman.org/2022/open-letter-meridian-police-ada-county-sheriff/>
- <https://stlukensexposed.com/> (all links and webpages from this website that violate the Permanent Injunction Order including, but not limited to, the following webpages and/or links embedded in the webpages: <https://stlukensexposed.com/truth-about-st-lukes/>, <https://stlukensexposed.com/lawsuit/>; <https://stlukensexposed.com/lawsuit/evidence-that-cps-agents-meridian-police-and-st-lukes-were-lying/>; <https://stlukensexposed.com/lawsuit/diego-answer-4th-amended-complaint/>; <https://stlukensexposed.com/lawsuit/judge-lynn-norton-violates-the-constitution-again/>; <https://stlukensexposed.com/lawsuit/judge-lynn-norton-judicial-misconduct/>, <https://stlukensexposed.com/lawsuit/erik-stidham-criminal-complaints/>; <https://stlukensexposed.com/lawsuit/summary-video/>)
- <https://www.facebook.com/SaveBabyCyrus/> (all links and webpages from this website that violate the Permanent Injunction Order including, but not limited to, the following webpages and/or links embedded in the webpages: [https://www.facebook.com/SaveBabyCyrus/posts/pfbid034caCEKGT6LgyPudmF6ruqzu6jCBojcmEa5UeY4Waki2thyMi1ytYr72wu7t8Wol](https://www.facebook.com/SaveBabyCyrus/posts/pfbid034caCEKGT6LgyPudmF6ruqzu6jCBojcmEa5UeY4Waki2thyMi1ytYr72wu7t8Wol;); [https://www.facebook.com/SaveBabyCyrus/posts/pfbid0RHvM8TZjJt4rpng6jESxnJRUUnAxMhfeYHncx1VeQ3PMCWWJhAje8yvZpqT59XcoJl](https://www.facebook.com/SaveBabyCyrus/posts/pfbid0RHvM8TZjJt4rpng6jESxnJRUUnAxMhfeYHncx1VeQ3PMCWWJhAje8yvZpqT59XcoJl;);

<https://www.facebook.com/SaveBabyCyrus/posts/pfbid0c26BXVnvBwT3B8JWxVB UkaALb1KYwXTxo7kPN4ErkZiW8pb3qoxL2pogrMXPdGVdl;>
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid0g3ULabfJ7WwrcinRsn42Xh RTABRzEaHGpQwKWBGzQ3eRkgdCGZUoM8Wxq9599ZdCl;>
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid02Q6u5j9g19dG3P4s2shQBa SimN5XHoYL6vcyPBVi6BgWso8FUm7HRfHGG9iQXsWKjl;>
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid0fdzWiatcZBnPLJ1Ptq7ydVp QVDgD1Xt9Vz63yKAQas2BjZxuTYg2oWEdMd43czXrl;>
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<https://www.facebook.com/SaveBabyCyrus/posts/pfbid0mWHqY6eMMforMTyPAw gccEnpKUp4E63qLutFME8x2PC71JrHE8Eq4XTVJAx65JaSl;>
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid0KFvR9PQv3WiTdJ9xzY8T gDPnJywpeEG3ZWhF5eezgFNgsESoxnAnovsiUWFq198l;>
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid0r5ztTdRA3ErqnxYepJEYyuj ZDbhAcuPZbeYDwRVXew6dtSnE3EtJN3xFuR8GBbzTl;>
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<https://www.facebook.com/SaveBabyCyrus/posts/pfbid0ZQBMV9TGsG7b67SSP8H DeBBrxhwfyEVvZZJ68yVLijPCgoYoqn2UwuiR5DfLi5t9l;>
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid0XWkVv5D6eFAJWYbM9P qTWF1Aq6B8V34PTSvstELnzLccsoK1iuVwjnzEd7HTYTvsl;>
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid02XYAkyvd9EkMnGGLFDs ZSi898JG8FqpWaCnSkVfLenyZJ8wtuQsyELTTc5DJMp5W5l;>
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid0iKqNYEQ9JBbAG2bDoFBn anvPNt6HccL3QWMCtn5SWWNqtGzzwwmY4J9PRyJGsEWTl;>
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid0MSNGXbd4wCsn52gjW7X E5Yz3gWYE9pxTTwydVwHvVvj21C86PajF2gycfoZj9A45l;>
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid0vjCgWmLUWXULC9LaQ4 DJiD16G75Pz32Kw537sqVEyDLyDeJEH8j2TiifJQm9in5fl;>
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid0385C6SciSWJ4LX1X5ShW KTUYtZHAwrVlsjUDV5WHzMgd59WqTmexoX3GEn54cnSjul;>
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid08bmm8FLoGi7a82Ca7jn9Tk UHjeNoTVu6vNb9Kr73UNKodijuwei1uiu9tMsqskkXl;>
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid02Qnm31ZesxfY8G3MiXWq MQmV4YisRj3yJCY76x5UkoxebXAoSNUXlmvSVyxqNj7zDl;>
<https://www.facebook.com/SaveBabyCyrus/videos/daddy-playing-peek-a-boo-with-baby-cyrus-/459198315981998/;>
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid0naef7pbfTSMHca28esYD8Z wLHWsydEspgmPFAfn1C9Mpuaw2NcvmqFivsTZbYntnl;>
<https://www.facebook.com/SaveBabyCyrus/videos/st-lukes-shutdown-entire-hospital-on-march-15th-over-peaceful-families-protestin/1006608316897658/;>
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid033sDXFrdrvXWGbigUjgmG X6TLpbeQWmesctM7D7EMZxjHnG53mDtNHZQP1wXkTjaQBl;>

<https://www.facebook.com/SaveBabyCyrus/posts/pfbid02ZU7JMfE8pDVorfNygazR7uEyHjXFPNb98bnmvdor6vpSvXGChy9n8qzb6qsUZzvrl;>
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<https://www.facebook.com/SaveBabyCyrus/posts/pfbid05ZwkFWiWdz1FnGoBS1DSVYaGWDrKjFCs2G7EgzxESFvLRa1SCHicMb7mUkTd2Tqol;>
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<https://www.facebook.com/SaveBabyCyrus/posts/pfbid0rX1R83FYdtFEHo3qZNTZoGRVXMya1YghkNi6ZY22QceRDXfdLtnTq3dcJbKHdXEYl;>
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<https://www.facebook.com/SaveBabyCyrus/posts/pfbid02DU5beUvuicrjdUuNdiQgdgRTTi9cV49q4Ei7dvj8cN9A2jciBsGdS25vTRxPpeSQL;>
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<https://www.facebook.com/SaveBabyCyrus/posts/pfbid02LecjwM2V6cw88DF33WFY7TRWQwTSbhZQFgDN1NgR4qzPmsSWjcLRaZUv1Db8Y7W1;>
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid02p1RtNfHogi2taZbZCZCPHVUR53HTTU73ZFZY1zTJRYuVmR4wkTUAMveRf6i3K6Gv1;>
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid0uGTMTVfN6bQMHLgxGoOtCdw1TtSC7pDUeSetRqNVphxhiB3MQvwRRy8WqG3zuMKrl;>
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid0NQCnfyK13fsUmTABNzdu6bwKJtsAxaLLU7MmXqCkk5N2aBdGT3s2KoLMkQ6KDGal;>
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid0SRtCLsRc3eEQasrC1AVPLPAWF7xbrSi7UpCbNxE88aFnzQfXsmqrbrbs9u688zXol;>
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<https://www.facebook.com/SaveBabyCyrus/posts/pfbid02boe2RARsVpB7n5fEYay945WJricC4bsSxHUSgvVAPXx7prmnJU1mE62v39UFGJEjl;>
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid02zZmhCab16aGDCSKWtibdhYpdCwX264pPeX6HXKiuDxFcx6wzFEbwCgHqQivr17ol;>
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<https://www.facebook.com/SaveBabyCyrus/posts/pfbid02Ddug6irdGWty8vzbNuBRdEdgAcJHTnDrLLU2KYb6x72piritLcJ14iC8iefbn2xQXl;>
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<https://www.facebook.com/SaveBabyCyrus/posts/pfbid02H66EnDHWyJSzhxoU93taSFLaFnhL4PfHBMUuovLQhZwT8FWM22fjige7f6XLtkBF1;>
<https://www.facebook.com/SaveBabyCyrus/posts/pfbid02ThbiGSyKGFCdGKHrm8CX7ZT1WR5jnrV7zvW1Grt6YxzEt88CRVyzhb997zvDmgu3l>

- all <https://telegram.org/> posts and/or comments that violate the Permanent Injunction Order.
- <https://www.youtube.com/watch?v=RYZRu648O10>
- <https://www.youtube.com/watch?v=hIXwUj1cLRI>
- <https://www.youtube.com/watch?v=XKVMvmkRoe4>
- <https://www.youtube.com/watch?v=rzw0B8HVG18>
- <https://player.vimeo.com/video/688343093>
- <https://player.vimeo.com/video/689507913>
- <https://player.vimeo.com/video/690083915>

- <https://player.vimeo.com/video/692986648>

Please comply with the Court's Permanent Injunction by September 22, 2023.

If you do not, we will pursue all available legal remedies.

This cease-and-desist letter is sent without waiver of any right or remedy available at law or equity.

Sincerely,

/s/Erik F. Stidham

Erik F. Stidham
Partner
of Holland & Hart LLP

EFS:cmc
Enclosures

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