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Robert A. Faucher (ISB #4745)
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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 ROBERT A.
FAUCHER IN SUPPORT OF
JUDGMENT CREDITORS'
APPLICATIONS FOR CHARGING
ORDER**

I, Robert A. Faucher, declare and state as follows:

Background

1. I am one of the attorneys of record for Plaintiffs in this matter. I am familiar with the facts and proceedings in this matter and have personal knowledge of the matters stated in this Declaration.

2. I am a partner in the Boise office of the law firm of Holland & Hart LLP and am licensed to practice law in the State of Idaho. Along with my colleagues identified above, I am counsel for Plaintiffs-Judgment Creditors St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd., Chris Roth, Natasha D. Erickson, M.D., and Tracy W. Jungman, NP (collectively, "Judgment Creditors").

3. I make this Declaration on behalf of Judgment Creditors in support of (1) their Application for Entry of Charging Order (Power Marketing Agency, LLC) and (2) their Application for Entry of Charging Order (Power Marketing Consultants, LLC). Both of these applications (the "Applications") pertain to equity interests of defendant-judgment debtor Diego Rodriguez ("Rodriguez") in Idaho limited liability companies.

4. On August 29, 2023, this Court entered a Default Judgment ("Judgment") in favor of the St. Luke's Parties and against Rodriguez and the five other defendants (collectively, "Judgment Debtors").

5. As of the date of this Declaration, the Judgment Debtors have paid nothing toward the Judgment. Nor have the St. Luke's Parties executed on any property to recover the Judgment. Nor have the Judgment Creditors recovered any money by means of a

garnishment.¹

The equity interests can be charged for Rodriguez's Judgment liability

6. Although Rodriguez has appealed the Judgment, the automatic stay of Idaho Appellate Rule 13 has long since expired. Nothing stays the relief Judgment Creditors seek in the Applications.

7. Evidence suggests that Rodriguez owns equity interests in two Idaho limited liability companies, Power Marketing Agency, LLC and Power Marketing Consultants LLC.

8. The Power Marketing Agency website indicates that it is owned by Rodriguez. It states that Rodriguez is “the founder and President of the Power Marketing Agency”

<https://powermarketing.agency/about/team/> (last visited March 7, 2024). A true and correct screenshot of the “Meet the Team” page of the Power Marketing Agency website is attached hereto as **Exhibit A**.

¹ Rodriguez has taken steps to evade the Judgment Creditors, including using a virtual address and refusing to comply with discovery obligations. Collection activity is ongoing, although no monetary amount has yet been credited against the Judgment liability. Specifically, Judgment Creditors have garnished certain bank accounts, but the sheriffs presently hold the funds. Second, the Gem County Sheriff has levied upon a motor vehicle owned by Rodriguez, pending sheriff's sale. Third, one of the Judgment Creditors owns a Gem County residence previously owned by Judgment Debtor Ammon Bundy. However, the Judgment Creditor acquired title to that house by means of a negotiated settlement in the fraudulent conveyance lawsuit filed in Gem County—not by direct conveyance through collection legal process. The Judgment Creditor still owns the house; i.e., the house has not yet been converted into cash. Under these circumstances, it is unclear how the value of the house should be credited against the Judgment at this time. Regardless, however, the house is reportedly worth no more than \$1.5 million, so even if the value of the house were to be credited against the Judgment liability at some point, the outstanding unpaid Judgment would remain in excess of \$50 million. The Default Judgment's current balance is approximately \$51,875,000, exclusive of post-judgment interest. This amount does not give the Judgment Debtors a credit for the value of the residence nor any of the other property identified in this footnote.

9. According to the Idaho Secretary of State Website, Power Marketing Agency, LLC was administratively dissolved effective March 1, 2024. It remains dissolved as of the date of this Declaration. However, the St. Luke's Parties believe that it may have assets and that it may currently be selling various services and products and, therefore, potentially making distributions. Indeed, the Power Marketing Agency website, <https://powermarketing.agency/>, is still active and still lists products and services for sale. A true and correct screenshot of the "Products and Services" page of the Power Marketing Agency website is attached hereto as **Exhibit B**.

10. On March 21, 2023, the St. Luke's Parties served Rodriguez with Requests for Admission in this lawsuit. Requests for Admission Nos. 66-68 ask Rodriguez to admit that he owns and controls Power Marketing Agency, LLC. Request for Admission No. 77 asks Rodriguez to admit that he received revenue in the form of income, disbursements, or payments from Power Marketing Agency, LLC during 2022. Rodriguez refused to respond to these Requests for Admission. They are, therefore, deemed admitted pursuant to Idaho Rule of Civil Procedure 36. A true and correct copy of excerpts of the Requests for Admission that were served on March 21, 2023, are attached hereto as **Exhibit C**.

11. A true and correct copy of the last Annual Report filed with the Idaho Secretary of State for Power Marketing Agency, LLC, dated December 2, 2022, is attached hereto as **Exhibit D**. None of the capacities identified there for Miranda Chavoya evidence that she is a member (owner) of the limited liability company.

12. According to the Idaho Secretary of State website, Power Marketing Consultants LLC was administratively dissolved effective April 13, 2023. It remains dissolved as of the date of this Declaration. However, based in part on Rodriguez's continuing business activity under

this name, the St. Luke's Parties believe that it continues to take corporate actions, may have assets and that it may currently be selling various services and products and, therefore, potentially making distributions. At the time of its dissolution, Judgment Debtor was identified as its registered agent and manager.

13. Attached hereto as **Exhibit E** is a true and complete copy of the most recent annual report that Power Marketing Consultants LLC filed with the office of the Secretary of State of the State of Idaho. No natural person other than Rodriguez is identified in any filing of Power Marketing Consultants LLC in the Secretary of State's office. Although Power Marketing Consultants LLC was administratively dissolved by the Secretary of State of the State of Idaho on or about April 13, 2023, Judgment Creditors' attorneys believe that it may nonetheless be selling various services and products, and, therefore, potentially making distributions to Rodriguez.

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

DATED this 15th day of March, 2024.

/s/Robert A. Faucher

Robert A. Faucher

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of March, 2024, 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:

Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe: aebundy@msn.com
aebundy@bundyfarms.com

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

Miranda Chavoya
9169 W State Street
Suite 3177
Boise, ID 83714

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

/s/ Robert A. Faucher

Robert A. Faucher
for HOLLAND & HART LLP

EXHIBIT A



Meet the Team

Power Marketing Agency Team

Diego Rodriguez is an author,

(321) 977-

Exhibit A, Page 1



Diego Rodriguez
President

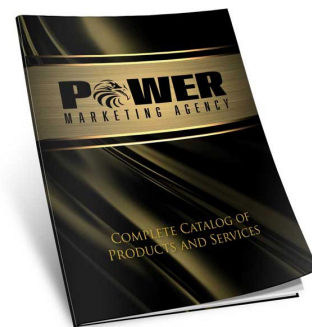
motivational speaker, and entrepreneur. He is the founder and President of the [Power Marketing Agency](#) and he has trained over 8,000 entrepreneurs in over 40 countries.

Diego is a highly sought after international business growth consultant and was trained by [Jay Abraham](#). Diego is an world traveler and overseas investor and often hosts business development events online or in exotic locations around the world.

Diego's proprietary [Power Marketing Program](#) has a 100% success record of growing any business in any industry and of any size. He has consulted businesses using the Power Marketing Program in dozens of industries across the world.

1444

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Analysis



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of Products and
Services

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- [The Secret Behind the Top Brands in the World](#)
- [Business Opportunity Quiz](#)



Jake H.
Video Producer



Kyle B.
Video Producer



Levi A.
Aerial Technician



Chase W.
Web Developer



Chelsi H.
Director of
Consulting Services



Micaiah C.
Account Executive



Moriah B.
Production Manager



Miranda M.
Video Editor



Manoah C.
Motion Graphics



Marissa A.
Graphic Design



Tracey R.
Graphic Design



Ivan G.
Video Editor

FLORIDA LOCATION:

Power Marketing Agency
1317 Edgewater Dr. Suite
5077
Orlando, FL 32804
(321) 977-1444

SITE INFORMATION:

[Privacy Policy](#)
[Terms and Conditions](#)
[Site Map](#)
[Contact Us](#)

SOCIAL MEDIA LINKS:



(321) 362-7564 fax

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EXHIBIT B



PRODUCTS & SERVICES



VIDEO PRODUCTION

Get More Customers, Close More Sales, and Make More Money with Professional Videos



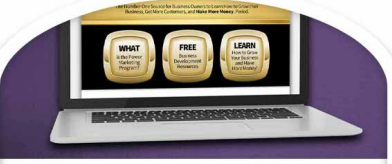
MOBILE SUPERSTREAM

How to **Make Money, Save Money, and Satisfy Everyone** with a Professional Livestream



AUDIO PRODUCTION

Get More Customers, Close More Sales, and Make More Money with Professional Videos



Web Design - Our Proprietary Design Philosophy that Changed Web Design Forever!



Graphic Design - Like it or not The Marketplace Will Judge You Based on Your Appearance



Logo Design - Get a Brand New Professionally Designed Logo for your Updated Brand



Professional Photography



Full Color Printing



Signs and Banners

FLORIDA LOCATION:
Power Marketing Agency
1317 Edgewater Dr. Suite
5077
Orlando, FL 32804
(321) 977-1444
(321) 362-7564 fax

SITE INFORMATION:
[Privacy Policy](#)
[Terms and Conditions](#)
[Site Map](#)
[Contact Us](#)

SOCIAL MEDIA LINKS:



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EXHIBIT C

Erik F. Stidham (ISB #5483)
Jennifer M. Jensen (ISB #9275)
Zachery J. McCraney (ISB #11552)
HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-5974
Telephone: 208.342.5000
Facsimile: 208.343.8869
E-mail: efstidham@hollandhart.com
jmjensen@hollandhart.com
zjmccraney@hollandhart.com

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,

Defendants.

Case No. CV01-22-06789

**PLAINTIFF ST. LUKE’S HEALTH
SYTEM, LTD’S FIRST REQUESTS FOR
ADMISSION TO DEFENDANT DIEGO
RODRIGUEZ**

Plaintiff St. Luke’s Health System, LTD (“Plaintiff”), by and through its attorney of record, hereby requests Defendant Diego Rodriguez (“Rodriguez”) respond to all requests for admission in accordance with the Instructions and Definitions set forth below within thirty (30)

PLAINTIFF ST. LUKE’S HEALTH SYSTEM, LTD’S FIRST REQUESTS FOR
ADMISSION TO DEFENDANT DIEGO RODRIGUEZ - 1

REQUEST FOR ADMISSION NO. 60: Admit that Power Marketing Consultants LLC generated less than \$250,000 in revenue in 2020.

REQUEST FOR ADMISSION NO. 61: Admit that Power Marketing Consultants LLC generated less than \$250,000 in revenue in 2021.

REQUEST FOR ADMISSION NO. 62: Admit that Power Marketing Consultants LLC generated less than \$250,000 in revenue in 2022.

REQUEST FOR ADMISSION NO. 63: Admit that Power Marketing Consultants LLC has generated less than \$250,000 in revenue in 2023.

REQUEST FOR ADMISSION NO. 64: Admit that Power Marketing Consultants LLC has not generated more than \$150,000 in revenue in any single calendar year between 2020 and present.

REQUEST FOR ADMISSION NO. 65: Admit that Power Marketing Consultants LLC has never reported more than \$70,000 in taxable revenue on any federal tax return filed for any taxable year between 2020 and present.

REQUEST FOR ADMISSION NO. 66: Admit that You own Power Marketing Agency, LLC.

REQUEST FOR ADMISSION NO. 67: Admit that You control Power Marketing Agency, LLC.

REQUEST FOR ADMISSION NO. 68: Admit that You control the finances of Power Marketing Agency, LLC.

REQUEST FOR ADMISSION NO. 69: Admit that Power Marketing Agency, LLC filed tax returns in 2020.

REQUEST FOR ADMISSION NO. 70: Admit that Power Marketing Agency, LLC filed tax returns in 2021.

REQUEST FOR ADMISSION NO. 71: Admit that Power Marketing Agency, LLC filed tax returns in 2022.

REQUEST FOR ADMISSION NO. 72: Admit that Power Marketing Agency, LLC engaged in financial transactions in 2020.

REQUEST FOR ADMISSION NO. 73: Admit that Power Marketing Agency, LLC engaged in financial transactions in 2021.

REQUEST FOR ADMISSION NO. 74: Admit that Power Marketing Agency, LLC engaged in financial transactions in 2022.

REQUEST FOR ADMISSION NO. 75: Admit that Power Marketing Agency, LLC has been engaged in financial transactions in 2023.

REQUEST FOR ADMISSION NO. 76: Admit that You control the filing of tax returns by Power Marketing Agency, LLC.

REQUEST FOR ADMISSION NO. 77: Admit that You received revenue in the form of income, disbursements, or payments from Power Marketing Agency, LLC during the period of 2022.

REQUEST FOR ADMISSION NO. 78: Admit that You received revenue in the form of income, disbursements, or payments from Power Marketing Agency, LLC during 2023.

REQUEST FOR ADMISSION NO. 79: Admit that Power Marketing Agency, LLC generated less than \$250,000 in revenue in 2020.

REQUEST FOR ADMISSION NO. 80: Admit that Power Marketing Agency, LLC generated less than \$250,000 in revenue in 2021.

REQUEST FOR ADMISSION NO. 229: Admit that You publicly stated about St. Luke's, "They are profiting off of the kidnapping of children, they are involved in a child trafficking network, they did make money off the kidnapping of my grandson, and they did act wickedly and evil in this case."

DATED: March 21, 2023.

HOLLAND & HART LLP

By: /s/ Erik F. Stidham

Erik F. Stidham

Jennifer M. Jensen

Zachery J. McCraney

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of March, 2023, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Ammon Bundy for Governor
P.O. Box 370
Emmett, ID 83617

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Ammon Bundy for Governor
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

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:

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:

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:

Freedom Man Press LLC
c/o Diego Rodriguez
9169 W. State St., Ste. 3177
Boise, ID 83714

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe:

Freedom Man PAC
c/o Diego Rodriguez
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Orlando, FL 32804

- U.S. Mail
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- Email/iCourt/eServe:

Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Email/iCourt/eServe: dr238412@me.com;
freedommanpress@protonmail.com

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

19969716_v5

EXHIBIT D



0005006196



STATE OF IDAHO
 Office of the secretary of state, Lawrence Denney
ANNUAL REPORT
 Idaho Secretary of State
 PO Box 83720
 Boise, ID 83720-0080
 (208) 334-2301
 Filing Fee: \$0.00

For Office Use Only
-FILED-
 File #: 0005006196
 Date Filed: 12/2/2022 2:33:49 PM

Entity Name and Mailing Address:		
Entity Name:	Power Marketing Agency, LLC	
The file number of this entity on the records of the Idaho Secretary of State is:	0004508401	
Address	9169 W STATE ST PMB 3177 BOISE, ID 83714-1733	
Entity Details:		
Entity Status	Active-Existing	
This entity is organized under the laws of:	IDAHO	
If applicable, the old file number of this entity on the records of the Idaho Secretary of State was:		
The registered agent on record is:		
Registered Agent	Miranda Chavoya Registered Agent Physical Address 9169 W STATE ST SUITE 3177 BOISE, ID 83714 Mailing Address 9169 W STATE ST STE 3177 BOISE, ID 83714-1733	
Limited Liability Company Managers and Members		
Name	Title	Business Address
<input checked="" type="checkbox"/> Miranda Chavoya	Manager	9169 W STATE ST SUITE 3177 BOISE, ID 83714
The annual report must be signed by an authorized signer of the entity.		
Job Title: President		
<i>Miranda Chavoya</i>		<i>12/02/2022</i>
Sign Here		Date

B0757-9210 12/02/2022 2:33 PM Received by Office of the Idaho Secretary of State

EXHIBIT E



0004557012



STATE OF IDAHO
 Office of the secretary of state, Lawrence Denney
ANNUAL REPORT
 Idaho Secretary of State
 PO Box 83720
 Boise, ID 83720-0080
 (208) 334-2301
 Filing Fee: \$0.00

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 File #: 0004557012
 Date Filed: 1/6/2022 1:35:22 PM

Entity Name and Mailing Address:

Entity Name: POWER MARKETING CONSULTANTS LLC

The file number of this entity on the records of the Idaho Secretary of State is: 0000370757

Address: DIEGO RODRIGUEZ
 1876 E ADELAIDE DR
 MERIDIAN, ID 83642-9219

Entity Details:

Entity Status: Active-Existing

This entity is organized under the laws of: IDAHO

If applicable, the old file number of this entity on the records of the Idaho Secretary of State was: W120780

The registered agent on record is:

Registered Agent: DIEGO RODRIGUEZ
 Registered Agent
 Physical Address
 1876 E ADELAIDE
 MERIDIAN, ID 83642
 Mailing Address
 1876 E ADELAIDE DR
 DIEGO RODRIGUEZ
 MERIDIAN, ID 83642-9219

Agent or Address Change

Select if you are appointing a new agent.

Limited Liability Company Managers and Members

Name	Title	Business Address
Diego Rodriguez	Manager	1876 E ADELAIDE MERIDIAN, ID 83642

The annual report must be signed by an authorized signer of the entity.

Job Title: President

Diego Rodriguez _____ 01/06/2022
 Sign Here _____ Date

B0674-1859 01/06/2022 1:35 PM Received by ID Secretary of State Lawrence Denney