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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; and  
NATASHA D. ERICKSON, MD, 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

**DECLARATION OF ANNE H. HAWS IN  
SUPPORT OF OPPOSITION TO  
MOTION FOR PROTECTIVE ORDER  
AND TO QUASH DEPOSITION DUCES  
TECUM NOTICE**

I, Anne H. Haws, declare and state as follows:

1. I am a member of the firm of Holland & Hart LLP. I serve as an attorney for St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd., Chris Roth, Dr. Natasha Erickson, and Tracy Jungman, NP.

2. Attached as **Exhibit A** is a true and correct copy of the Subpoena Duces Tecum served on Diego Rodriguez on July 24, 2025.

3. As of the date of this response in opposition to the Motion, Rodriguez has failed to comply with the clear dictate of Rule 26(c) by seeking to confer with counsel for Plaintiffs to resolve the issues he raises regarding the subpoena without Court action.

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

Executed this 12th day of August, 2025.

/s/ Anne H. Haws

Anne H. Haws

## CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of August, 2025, 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  
Ammon Bundy for Governor  
People's Rights Network  
c/o Ammon Bundy  
P.O. Box 1062  
Cedar City, Utah 84712

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

Ammon Bundy  
896 E 400 S  
New Harmony, UT 84757

- ☒ U.S. Mail
- ☐ Hand Delivered
- ☐ Overnight Mail - UPS
- ☐ 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

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# **EXHIBIT A**

Erik F. Stidham (ISB #5483)  
Jennifer M. Jensen (ISB #9275)  
Zachery J. McCraney (ISB #11552)  
Anne Henderson Haws (ISB #10412)  
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Boise, ID 83702-5974  
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E-mail: efstidham@hollandhart.com  
jmjensen@hollandhart.com  
zjmccraney@hollandhart.com  
ahhaws@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 and an unincorporated  
association,

Defendants.

Case No. CV01-22-06789

**NOTICE OF VIDEOTPAED  
DEPOSITION DUCES TECUM OF  
DIEGO RODRIGUEZ**

**TO: DIEGO RODRIGUEZ**

**PLEASE TAKE NOTICE THAT** Plaintiffs, St. Luke's Health System, Ltd, St. Luke's Regional Medical Center, Ltd, Chris Roth, Natasha D. Erickson, MD, and Tracy W. Jungman, NP, will take the testimony and oral examination of **DIEGO RODRIGUEZ**, before an official Videographer, Court Reporter and Notary Public for the State of Idaho, on ***Monday, August 18, 2025, at 9:00 a.m. MDT***, at the offices of **Holland & Hart LLP, 800 W. Main Street, Suite 1750, Boise, Idaho 83702**, at which time and place the deponent is notified to appear and take part in said examination. This deposition shall be taken pursuant to the Idaho Rules of Civil Procedure.

**YOU ARE FURTHER REQUESTED** to have present at the time of the taking of your deposition the following documents and tangible things described in "**Exhibit A**" attached hereto.

DATED: July 24, 2025.

HOLLAND & HART LLP

By: /s/Erik F. Stidham

Erik F. Stidham

Jennifer M. Jensen

Zachery J. McCraney

Anne Henderson Haws

*Counsel for Plaintiffs*

## CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of July, 2025, 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  
Ammon Bundy for Governor  
People's Rights Network  
c/o Ammon Bundy  
P.O. Box 1062  
Cedar City, Utah 84712

- ☒ U.S. Mail
- ☐ Hand Delivered
- ☐ Overnight Mail
- ☒ Email/iCourt/eServe:  
[aebundy@bundyfarms.com](mailto:aebundy@bundyfarms.com)

Ammon Bundy  
896 E 400 S  
New Harmony, UT 84757

- ☒ U.S. Mail
- ☐ Hand Delivered
- ☐ Overnight Mail - UPS
- ☐ 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

## EXHIBIT A

The following definitions and instructions shall apply to each request as if fully set forth therein:

### Definitions and Instructions

1. The terms “you,” “your,” “yours,” and “Judgment Debtor” refer to Defendant Diego Rodriguez and his agents, representatives, investigators, employees, or other persons acting or purporting to act on behalf of Judgment Debtor.
2. “Defendants” refers to all named Defendants in the lawsuit, including Ammon Bundy, Ammon Bundy for Governor, Diego Rodriguez, Freedom Man Press LLC, Freedom Man PAC, and People's Rights Network.
3. “Related Entity” shall mean any entity owned or controlled by any Defendant and includes without limitation Abish-husbondi Inc., Dono Custos, Inc., Freedom Tabernacle, Incorporated, Freedom Tabernacle, Inc., Power Marketing Consultants LLC, Power Marketing Agency, LLC, and Power Marketing Consultants Agency, LLC.
4. “Asset” or “Assets” is anything that has current or future economic value, including, but not limited to money, securities, real property, promissory notes, contracts, accounts receivable, cryptocurrency, patents, trademarks, or precious metals.
5. The term “document” as used herein shall mean and include all "documents and tangible things" to the broadest extent included and described in the Florida Rules of Civil Procedure, including but not limited to, the originals and all drafts or copies, together with any annotations or highlighted copies containing all or part of the information requested, in the possession, custody or control of you, your attorneys, representatives, employees, agents or any other natural person or business or legal entity acting or purporting to act for or on your behalf, or their respective directors, officers, representatives, employees or agents, as the case may be. Also, the term "document" or "writing" means any medium upon which intelligence or information can be recorded or retrieved, and includes, without limitation, the original and each copy, regardless of origin and location, of any written material, book, pamphlet, periodical, letter, memorandum (including any memorandum or report of a meeting or conversation), invoice, bill, order form, receipt, financial statement, accounting entry, diary, draft, working paper, chart, paper, print, laboratory record, drawing, sketch, graph, index, list, written, recorded, transcribed, punched, taped, filmed, or graphic matter, however produced or reproduced, which is in your possession, custody, or control or which was, but is no longer, in your possession, custody, or control. The term "document" or "writing" shall also include all information stored or created on any electronic medium, including but not limited to E-Mail, and it includes copies or drafts of documents by whatever means made, including specifically but not exclusively, those copies bearing commentary or notations not appearing on the original. Without limiting the foregoing, this definition is intended to cover and extends to all items that can be the subject of production or discovery under the Florida Rules of Civ] Procedure.
6. If any document requested to be produced was but is no longer in Judgment Debtor’s possession, custody, or control, or is no longer in existence, state whether it is (a) missing or lost, (b) destroyed, (c) transferred voluntarily or involuntarily to others, and if so, to whom; or (d) otherwise disposed of and in each instance, explain the circumstances surrounding such disposition and state the approximate date thereof.



7. The term “person” shall refer to any natural person, firm, association, partnership, corporation, joint venture, state agency or any other form of legal or business entity.

8. The term “concerning” shall mean referring to, pertaining to, regarding, relating to, having any relationship to and evidencing, or constituting evidence of, in whole or in part.

9. The singular number and the masculine gender as used herein shall be deemed to include the plural or the feminine or neuter, as appropriate, and vice versa, and the conjunctive "and" shall be deemed to include the disjunctive "or" and vice versa.

10. The term "any" includes the word "all," and "all" includes the word "any."

11. These requests extend to all documents in the possession, custody, or control of any agent, representative, or attorney of Judgment Debtor.

12. In producing documents responsive to the requests, identify the request to which each produced document is responsive. If a document is responsive to more than one request, each request to which it is responsive should be identified.

13. If copies of documents are produced in lieu of originals, copies should be legible and bound or stapled in the same manner as the originals.

14. This is a continuing request for production of documents. If, after making your initial production, you obtain or become aware of any further document responsive to these requests, you are required to promptly produce such additional documents to Plaintiffs and to supplement your response and production pursuant to the provisions of the Idaho Rules of Civil Procedure.

15. The term "communication" means any oral, written or electronically recorded utterance, notation, or statement of any nature whatsoever, by and to whomsoever made, including, but not limited to, correspondence, conversations, telephone calls, dialogues, discussions, interviews, consultations, agreements, and any other understandings between or among two or more persons or any document that recorded or reflected any such communication.

## REQUESTS FOR PRODUCTION

1. All of your personal, financial, business and property records and all other papers, pass books, record books and books of account which tend to disclose the extent and nature of all financial interest, property and property rights owned by you from January 1, 2021, through the present.

2. All account statements for all savings accounts, checking accounts and savings and loan association share accounts owned by you from January 1, 2021, through the present.

3. All account statements for all savings accounts, checking accounts and savings and loan association share accounts, owned by you solely, or jointly as co-partner, or joint adventurer, in any business enterprise or owned by any corporation in which you have an interest (including but not limited to Freedom Tabernacle, Incorporated (Idaho), Freedom Tabernacle, Inc. (Florida), Power Marketing Consultants LLC, Power Marketing Agency, LLC, and Power Marketing Consultants Agency, LLC) from January 1, 2021, through the present.

4. The deeds to all real property owned by you.

5. The deeds to all real property owned by you solely, or jointly as co-partner, or joint adventurer, in any business enterprise, or owned by any corporation in which you have an interest, including but not limited to Freedom Tabernacle, Incorporated (Idaho), Freedom Tabernacle, Inc. (Florida), Power Marketing Consultants LLC, Power Marketing Agency, LLC, and Power Marketing Consultants Agency, LLC.

6. All corporate securities (stocks or bonds) owned by you.

7. All corporate securities (stocks or bonds) owned by you solely, or jointly as co partner, or joint adventurer, in any business enterprise, or owned by any corporation in which

you have an interest, including but not limited to Freedom Tabernacle, Incorporated (Idaho), Freedom Tabernacle, Inc. (Florida), Power Marketing Consultants LLC, Power Marketing Agency, LLC, and Power Marketing Consultants Agency, LLC.

8. The latest available balance sheets and other financial statements in your possession with respect to any and all business enterprises of whatever nature in which you possess any ownership interest, whether as partner, joint adventurer, stockholder or otherwise, including but not limited to Freedom Tabernacle, Incorporated (Idaho), Freedom Tabernacle, Inc. (Florida), Power Marketing Consultants LLC, Power Marketing Agency, LLC, and Power Marketing Consultants Agency, LLC,.

9. Your accounts receivable ledger or other personal record which sets forth the names and addresses of all persons or business enterprises that are indebted to you, and the amount of such indebtedness.

10. Your accounts receivable ledger or other personal record which sets forth the names and addresses of all persons or business enterprises that are indebted to you in your capacity as co-partner, or joint adventurer in any business enterprise.

11. Copies of your personal (or joint) Income Tax Returns (Federal Form 1040) from 2021 through the present.

12. Copies of the partnership or corporate Income Tax Returns for any partnership or corporation in which you possess any ownership interest whether as a partner, joint adventurer, stockholder or otherwise (including but not limited to Freedom Tabernacle, Incorporated (Idaho), Freedom Tabernacle, Inc. (Florida), Power Marketing Consultants LLC, Power Marketing Agency, LLC, and Power Marketing Consultants Agency, LLC), from January 1, 2021, through the present.

13. Inventory or other written statements or communications to you or your attorney which relate to your interest in any administration upon the estate of any deceased person.

14. The title certificates, registration certificates, bills of sale, and other evidences of ownership possessed by you with respect to any of the following described personal property owned by you:

- (a) Motor vehicles of any type;
- (b) Commercial, business or construction equipment of any type;
- (c) Boats, launches, cruisers or other vessels of any type.

15. The title certificates, registration certificates, bills of sale, and other evidences of ownership possessed by you with respect to any of the following described personal property owned by you solely, or jointly as co-partners, or joint adventurer, in any business enterprise or owned by any corporation in which you have an interest (including but not limited to Freedom Tabernacle, Incorporated (Idaho), Freedom Tabernacle, Inc. (Florida), Power Marketing Consultants LLC, Power Marketing Agency, LLC, and Power Marketing Consultants Agency, LLC):

- (a) Motor vehicles of any type;
- (b) Commercial, business or construction equipment of any type;
- (c) Boats, launches, cruisers or other vessels of any type;
- (d) Inventory of any stock of goods or equipment of any type.

16. All of the records pertaining to the transfer of any money or property interest or financial interests made by you since January 1, 2021.

17. All account statements from any brokerage accounts or investment accounts since January 1, 2021.

18. All documents relating to any interest that you have in any corporations, partnerships, or limited liability companies (including but not limited to Freedom Tabernacle, Incorporated (Idaho), Freedom Tabernacle, Inc. (Florida), Power Marketing Consultants LLC, Power Marketing Agency, LLC, and Power Marketing Consultants Agency, LLC), including but not limited to all corporate books, stock certificates, partnership agreements, and operating agreements, and all assets and liabilities of such entities.

19. All documents relating to all sources of income received by you for the last three (3) years, including but not limited to payroll stubs and documents.

20. All documents relating to any trusts in which you are beneficiary, including all documents identifying the assets of such trusts.

21. Without limiting any of the prior requests, all documents demonstrating your interests in real, personal, tangible, and intangible property from January 1, 2021, through the present.

22. From March 1, 2022, to present, all of the following in effect with respect to any entity you owned, controlled, founded, and/or operated (including but not limited to Freedom Tabernacle, Incorporated (Idaho), Freedom Tabernacle, Inc. (Florida), Power Marketing Consultants LLC, Power Marketing Agency, LLC, and Power Marketing Consultants Agency, LLC): articles of incorporation or other founding documents (including any amendments thereto); certificates of organization; operating agreements including amendments thereto); by-laws; shareholder agreements; and statements or certificates of limited partnership (including any amendments thereto).

23. From March 1, 2022, to present, all documents showing, reflecting, relating, and/or referring to transfers of Assets to and from any Related Entity (including but not limited

to Freedom Tabernacle, Incorporated (Idaho), Freedom Tabernacle, Inc. (Florida), Power Marketing Consultants LLC, Power Marketing Agency, LLC, and Power Marketing Consultants Agency, LLC).

24. All documents reflecting or showing the Assets owned, controlled, or held by Lareina Chavoya from January 1, 2021, through the present.

25. To the extent not produced in response to the foregoing requests, all financial statements and documents reflecting income or revenue, and/or any other documents that reflect your financial condition between January 1, 2021, through the present.

26. All documents reflecting or relating to any Assets that were transferred to, through, or from Freedom Tabernacle, Incorporated (Idaho) and Freedom Tabernacle, Inc. (Florida), from March 1, 2022, to present, including but not limited to all documents reflecting or relating to any Assets transferred to Freedom Tabernacle, Incorporated (Idaho) and Freedom Tabernacle, Inc. (Florida) from members of the People's Rights Network.

27. All documents related to the GiveSendGo, LLC accounts that were set up in relation to the Defamation Lawsuit, including but not limited to the accounts associated with the following pages: <https://www.givesendgo.com/GAZAG> and <https://www.givesendgo.com/babycyrus>.