

Erik F. Stidham (ISB #5483)
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

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

**DECLARATION OF ERIK F. STIDHAM
IN SUPPORT OF PLAINTIFFS'
OPPOSITION TO DEFENDANT DIEGO
RODRIGUEZ'S VERIFIED MOTION TO
CANCEL OR RECONSIDER THE
COURT'S ORDER ON MOTIONS FOR
SANCTIONS**

Erik F. Stidham declares and states as follows:

1. I am counsel 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.

DECLARATION OF ERIK F. STIDHAM IN SUPPORT OF PLAINTIFFS'
OPPOSITION TO DEFENDANT DIEGO RODRIGUEZ'S VERIFIED MOTION TO
CANCEL OR RECONSIDER THE COURT'S ORDER ON MOTIONS FOR
SANCTIONS - 1

2. I am a partner in the law firm of Holland & Hart LLP (“Holland & Hart”) and am duly licensed to practice law in the State of Idaho. I am attorney of record for Plaintiffs, and I make this declaration based upon my own personal knowledge of the matters stated herein.

3. Attached hereto as **Exhibit A** is a true and correct copy of the Affidavit of Publication from the Idaho Statesman which was filed on August 19, 2022.

4. Attached hereto as **Exhibit B** is a true and correct copy of the Proof of Publication from the Orlando Sentinel which was filed on August 19, 2022.

5. Attached hereto as **Exhibit C** is a true and correct copy of the Proof of Publication from the Orlando Weekly which was filed on August 19, 2022.

6. Using four of Mr. Rodriguez’s known and active email addresses, I emailed Mr. Rodriguez on several occasions: (1) June 2, 2022; (2) June 22, 2022; and (3) July 8, 2022. Each email included relevant pleadings from the litigation and requested that Mr. Rodriguez have his attorney contact me or, if Mr. Rodriguez was representing himself, that Mr. Rodriguez contact me. Attached hereto as **Exhibit D** are true and correct copies of emails I sent to Diego Rodriguez on June 2, 2022, June 22, 2022, and July 8, 2022, without attachments. Mr. Rodriguez did not respond to these emails; nor did any attorney respond on his behalf.

7. Attached hereto as **Exhibit E** is a true and correct copy of an Idaho Statesman article dated June 30, 2022, wherein Diego Rodriguez responded to a reporter’s request for comment regarding the litigation.

8. Attached hereto as **Exhibit F** is a true and correct copy of an article published by Mr. Rodriguez on or about June 30, 2022, titled “My Response to the Idaho Statesman Regarding the St. Luke’s Lawsuit” on the freedomman.org website.

9. I caused to be mailed on July 15, 2022, a complete copy of the Summons for Publication, Amended Complaint, Motion to Expedite Discovery (with supporting documents), and the Amended Order, among other pleadings, to Mr. Rodriguez's last known addresses in Idaho and Florida:

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

Diego Rodriguez
1876 E. Adelaide Dr.
Meridian, ID 83642-9219

Diego Rodriguez
9169 W. State St., Ste. 3177
Boise, ID 83714

10. Despite being served with the Amended Order and having several weeks to comply with the Court's directive, Mr. Rodriguez did not respond to Plaintiffs' interrogatories in any way by the Court-ordered date of August 5, 2022.

11. On August 19, 2022, Plaintiffs filed their motion for sanctions as to Mr. Rodriguez, with a notice of hearing for September 6, 2022. I caused Plaintiffs' notice of hearing and motion for sanctions as to Diego Rodriguez, with all of the supporting documents, to be mailed to Diego Rodriguez at his Orlando, Florida address. Mr. Rodriguez still did not respond to the interrogatories.

12. Mr. Rodriguez did not attend the September 6, 2022 hearing on the motion for sanctions against him. He did, however, file an Answer on September 6, 2022.

13. Attached hereto as **Exhibit G** is an email I received from Diego Rodriguez dated September 10, 2022, purporting to respond to the five Interrogatories addressed in the Amended Order.

DECLARATION OF ERIK F. STIDHAM IN SUPPORT OF PLAINTIFFS'
OPPOSITION TO DEFENDANT DIEGO RODRIGUEZ'S VERIFIED MOTION TO
CANCEL OR RECONSIDER THE COURT'S ORDER ON MOTIONS FOR
SANCTIONS - 3

14. On September 21, 2022, pursuant to the Court's Sanctions Order, I caused to be noticed the deposition of Mr. Rodriguez for a date he confirmed he was available—October 5, 2022.

15. A week later, Mr. Rodriguez emailed me incomplete responses to the five Interrogatories addressed in the Amended Order. Attached hereto as **Exhibit H** are Defendant's Responses to Plaintiffs First Set of Interrogatories to Defendant Diego Rodriguez, signed September 28, 2022.

16. On October 3, 2022, Mr. Rodriguez emailed me with objections to the deposition, including a contention about the Sanctions Order being confusing because of a typo. This objection seemed particularly disingenuous and was asserted so close to the deposition date and included with insults and false statements that it appeared intended solely to obstruct the legal process. Nevertheless, I explained why the Sanctions Order was not ambiguous. Attached hereto as **Exhibit I** is a true and correct copy of the email string including this correspondence.

17. Mr. Rodriguez clearly understood from the Sanctions Order that he was required to sit for a deposition, and he did so. Attached hereto as **Exhibit J** are true and correct excerpts from the deposition of Diego Rodriguez, taken on October 5, 2022.

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

DATED this 15th day of November, 2022.

/s/ Erik F. Stidham

Erik F. Stidham

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of November, 2022, I caused to be filed and served, via iCourt, 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
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

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

20236282_v2

Exhibit A

Exhibit A



Beaufort Gazette
Belleville News-Democrat
Bellingham Herald
Bradenton Herald
Centre Daily Times
Charlotte Observer
Columbus Ledger-Enquirer
Fresno Bee

The Herald - Rock Hill
Herald Sun - Durham
Idaho Statesman
Island Packet
Kansas City Star
Lexington Herald-Leader
Merced Sun-Star
Miami Herald

el Nuevo Herald - Miami
Modesto Bee
Raleigh News & Observer
The Olympian
Sacramento Bee
Fort Worth Star-Telegram
The State - Columbia
Sun Herald - Biloxi

Sun News - Myrtle Beach
The News Tribune Tacoma
The Telegraph - Macon
San Luis Obispo Tribune
Tri-City Herald
Wichita Eagle

AFFIDAVIT OF PUBLICATION

Account #	Order Number	Identification	Order PO	Amount	Cols	Depth
102169	291090	Print Legal Ad - IPL0081707		\$156.71	1	84 L

Attention: Erik Stidham
HollandHart
800 West Main Street Suite 1750
Suite 1750
Boise, ID 83702

IN THE DISTRICT COURT
OF THE FOURTH JUDICIAL
DISTRICT OF THE STATE OF
IDAHO, IN AND FOR THE COUN-
TY 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; and TRACY W.
JUNGMAN, NP, an individual,
Plaintiffs,

vs.

AMMON BUNDY an individual;
AMMON BUNDY FOR GOV-
ERNOR, a political organiza-
tion; 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
Summons by Publication (Diego
Rodriguez)
Judge Lynn Norton

SUMMONS - Publication To: Diego Rodriguez

You have been sued by St. Luke's
Health System, Ltd., St. Luke's Re-
gional Medical Center, Ltd., Chris
Roth, Natasha D. Erickson, M.D., and
Tracy W. Jungman, NP Plaintiffs, in the
District Court in and for Ada County,
Idaho, Case No. CV01-22-06789.

The nature of the claims against you
are: defamation; invasion of privacy;
intentional infliction of emotional dis-
tress; trespass; unfair business prac-
tices; wrongful charitable solicitations;
and civil conspiracy to commit defa-
mation, invasion of privacy, intentional
infliction of emotional distress, tres-
pass, unfair business practices, and
wrongful charitable solicitations.

Any time after 21 days following the
last publication of this summons, the
court may enter a judgment against
you without further notice, unless pri-
or to that time you have filed a written
response in the proper form, including
the Case No., and paid any required
filing fee to the Clerk of the Court at
Ada County Courthouse, 200 West
Front Street, Boise, Idaho 83702 (208)
287-6900 and served a copy of your
response on the Plaintiffs' attorney at
Holland & Hart LLP, 800 West Main
Street, Suite 1750, Boise, ID 83702
(208) 342-5000.

A copy of the Summons and Amend-
ed Complaint can be obtained by con-
tacting either the Clerk of the Court or
the attorney for Plaintiffs. If you wish
legal assistance, you should immedi-
ately retain an attorney to advise you
in this matter.

Dated: 7/13/22
PHIL McGRANE
ADA COUNTY District Court (seal)
By /s/ Erin Rowell, Deputy Clerk
Erik F. Stidham,
Holland & Hart LLP,
800 West Main Street, Suite 1750,
Boise, ID 83702
(208) 342-5000
IPL0081707
Jul 17,24,31,Aug 7 2022

Bettina Jantzen, being duly sworn, deposes and
says: That she is the Principal Clerk of The Idaho
Statesman, a daily newspaper printed and
published at Boise, Ada County, State of Idaho,
and having a general circulation therein, and which
said newspaper has been continuously and
uninterruptedly published in said County during a
period of twelve consecutive months prior to the
first publication of the notice, a copy of which is
attached hereto: that said notice was published in
The Idaho Statesman, in conformity with Section
60-108, Idaho Code, as amended, for:

No. of Insertions: 4

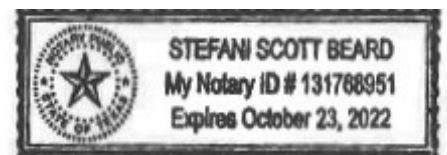
Beginning Issue of: 07/17/2022

Ending Issue of: 08/07/2022

(Legals Clerk)

On this 8th day of August in the year of 2022 before me,
a Notary Public, personally appeared before me Bettina
Jantzen known or identified to me to be the person
whose name subscribed to the within instrument, and
being by first duly sworn, declared that the statements
therein are true, and acknowledged to me that she
executed the same.

Notary Public in and for the state of Texas, residing in
Dallas County



Extra charge for lost or duplicate affidavits.
Legal document please do not destroy!



Beaufort Gazette
Belleville News-Democrat
Bellingham Herald
Bradenton Herald
Centre Daily Times
Charlotte Observer
Columbus Ledger-Enquirer
Fresno Bee

The Herald - Rock Hill
Herald Sun - Durham
Idaho Statesman
Island Packet
Kansas City Star
Lexington Herald-Leader
Merced Sun-Star
Miami Herald

el Nuevo Herald - Miami
Modesto Bee
Raleigh News & Observer
The Olympian
Sacramento Bee
Fort Worth Star-Telegram
The State - Columbia
Sun Herald - Biloxi

Sun News - Myrtle Beach
The News Tribune Tacoma
The Telegraph - Macon
San Luis Obispo Tribune
Tri-City Herald
Wichita Eagle

AFFIDAVIT OF PUBLICATION

Account #	Order Number	Identification	Order PO	Amount	Cols	Depth
102169	291092	Print Legal Ad - IPL0081709		\$151.33	1	81 L

Attention: Erik Stidham
HollandHart
800 West Main Street Suite 1750
Suite 1750
Boise, ID 83702

IN THE DISTRICT COURT
OF THE FOURTH JUDICIAL
DISTRICT OF THE STATE OF
IDAHO, IN AND FOR THE COUN-
TY 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; and TRACY W.
JUNGMAN, NP, an individual,
Plaintiffs,

vs.

AMMON BUNDY an individual;
AMMON BUNDY FOR GOV-
ERNOR, a political organiza-
tion; 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
Summons by Publication (Free-
dom Man PAC)
Judge Lynn Norton

SUMMONS - PUBLICATION To: Freedom Man PAC

You have been sued by St. Luke's
Health System, Ltd., St. Luke's Re-
gional Medical Center, Ltd., Chris
Roth, Natasha D. Erickson, M.D., and
Tracy W. Jungman, NP, Plaintiffs, in the
District Court in and for Ada County,
Idaho, Case No. CV01-22-06789.

The nature of the claims against you
are: defamation; invasion of privacy;
intentional infliction of emotional dis-
tress; and civil conspiracy to commit
defamation, invasion of privacy, inten-
tional infliction of emotional distress,
trespass, unfair business practices,
and wrongful charitable solicitations.

Any time after 21 days following the
last publication of this summons, the
court may enter a judgment against
you without further notice, unless pri-
or to that time you have filed a written
response in the proper form, including
the Case No., and paid any required
filing fee to the Clerk of the Court at
Ada County Courthouse, 200 West
Front Street, Boise, Idaho 83702 (208)
287-6900 and served a copy of your
response on the Plaintiffs' attorney at
Holland & Hart LLP, 800 West Main
Street, Suite 1750, Boise, ID 83702
(208) 342-5000.

A copy of the Summons and Amend-
ed Complaint can be obtained by con-
tacting either the Clerk of the Court or
the attorney for Plaintiffs. If you wish
legal assistance, you should immedi-
ately retain an attorney to advise you
in this matter.

Dated: 7/13/22
PHIL McGRANE
ADA COUNTY District Court (seal)
By: /s/Erin Rowell, Deputy Clerk
Erik F. Stidham,
Holland & Hart LLP,
800 West Main Street, Suite 1750,
Boise, ID 83702
(208) 342-5000
IPL0081709
Jul 17,24,31, Aug 7 2022

Bettina Jantzen, being duly sworn, deposes and
says: That she is the Principal Clerk of The Idaho
Statesman, a daily newspaper printed and
published at Boise, Ada County, State of Idaho,
and having a general circulation therein, and which
said newspaper has been continuously and
uninterruptedly published in said County during a
period of twelve consecutive months prior to the
first publication of the notice, a copy of which is
attached hereto: that said notice was published in
The Idaho Statesman, in conformity with Section
60-108, Idaho Code, as amended, for:

No. of Insertions: 4

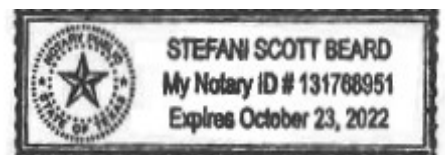
Beginning Issue of: 07/17/2022

Ending Issue of: 08/07/2022

(Legals Clerk)

On this 8th day of August in the year of 2022 before me,
a Notary Public, personally appeared before me Bettina
Jantzen known or identified to me to be the person
whose name subscribed to the within instrument, and
being by first duly sworn, declared that the statements
therein are true, and acknowledged to me that she
executed the same.

Notary Public in and for the state of Texas, residing in
Dallas County



Extra charge for lost or duplicate affidavits.
Legal document please do not destroy!



Beaufort Gazette
Belleville News-Democrat
Bellingham Herald
Bradenton Herald
Centre Daily Times
Charlotte Observer
Columbus Ledger-Enquirer
Fresno Bee

The Herald - Rock Hill
Herald Sun - Durham
Idaho Statesman
Island Packet
Kansas City Star
Lexington Herald-Leader
Merced Sun-Star
Miami Herald

el Nuevo Herald - Miami
Modesto Bee
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The Olympian
Sacramento Bee
Fort Worth Star-Telegram
The State - Columbia
Sun Herald - Biloxi

Sun News - Myrtle Beach
The News Tribune Tacoma
The Telegraph - Macon
San Luis Obispo Tribune
Tri-City Herald
Wichita Eagle

AFFIDAVIT OF PUBLICATION

Account #	Order Number	Identification	Order PO	Amount	Cols	Depth
102169	291093	Print Legal Ad - IPL0081710		\$156.71	1	84 L

Attention: Erik Stidham
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800 West Main Street Suite 1750
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Boise, ID 83702

IN THE DISTRICT COURT
OF THE FOURTH JUDICIAL
DISTRICT OF THE STATE OF
IDAHO, IN AND FOR THE COUN-
TY 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; and TRACY W.
JUNGMAN, NP, an individual,
Plaintiffs,

vs.

AMMON BUNDY an individual;
AMMON BUNDY FOR GOV-
ERNOR, a political organiza-
tion; 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
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Case No. CV01-22-06789
Summons by Publication (Free-
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Judge Lynn Norton

SUMMONS - PUBLICATION To: Freedom Man Press LLC

You have been sued by St. Luke's
Health System, Ltd., St. Luke's Re-
gional Medical Center, Ltd., Chris
Roth, Natasha D. Erickson, M.D., and
Tracy W. Jungman, NP, Plaintiffs, in the
District Court in and for Ada County,
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The nature of the claims against you
are: defamation; invasion of priva-
cy; intentional infliction of emotional
distress; unfair business practices;
wrongful charitable solicitations; and
civil conspiracy to commit defamation,
invasion of privacy, intentional in-
fliction of emotional distress, trespass,
unfair business practices, and wrong-
ful charitable solicitations.

Any time after 21 days following the
last publication of this summons, the
court may enter a judgment against
you without further notice, unless pri-
or to that time you have filed a written
response in the proper form, including
the Case No., and paid any required
filing fee to the Clerk of the Court at
Ada County Courthouse, 200 West
Front Street, Boise, Idaho 83702 (208)
287-6900 and served a copy of your
response on the Plaintiffs' attorney at
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(208) 342-5000.

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the attorney for Plaintiffs. If you wish
legal assistance, you should immedi-
ately retain an attorney to advise you
in this matter.

Dated: 7/13/22
PHIL McGRANE
ADA COUNTY District Court (seal)
By /s/ Erin Rowell
Deputy Clerk
Erik F. Stidham,
Holland & Hart LLP,
800 West Main Street, Suite 1750,
Boise, ID 83702
(208) 342-5000
IPL0081710
Jul 17,24,31 Aug 7 2022

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No. of Insertions: 4

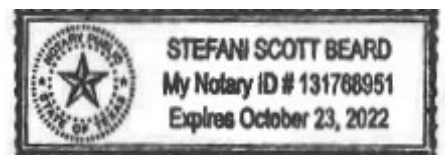
Beginning Issue of: 07/17/2022

Ending Issue of: 08/07/2022

(Legals Clerk)

On this 8th day of August in the year of 2022 before me,
a Notary Public, personally appeared before me Bettina
Jantzen known or identified to me to be the person
whose name subscribed to the within instrument, and
being by first duly sworn, declared that the statements
therein are true, and acknowledged to me that she
executed the same.

Notary Public in and for the state of Texas, residing in
Dallas County



Extra charge for lost or duplicate affidavits.
Legal document please do not destroy!

Exhibit B

Exhibit B

**Published Daily
ORANGE County, Florida**

Sold To:

Holland & Hart LLP - CU80146464
800 West Main St., Suite 1750
Boise, ID 83702

Bill To:

Holland & Hart LLP - CU80146464
800 West Main St., Suite 1750
Boise, ID 83702

**State Of Florida
County Of Orange**

Before the undersigned authority personally appeared
Rose Williams, who on oath says that he or she is a duly authorized
representative of the ORLANDO SENTINEL, a DAILY newspaper
published in ORANGE County, Florida; that the attached copy of
advertisement, being a Legal Notice in:

The matter of 11201-Notice of Action
Was published in said newspaper by print in the issues of, or by publication
on the newspaper's website, if authorized on Jul 18, 2022; Jul 25, 2022;
Aug 01, 2022; Aug 08, 2022.

Affiant further says that the newspaper complies with all legal requirements
for publication in Chapter 50, Florida Statutes.



Rose Williams

Signature of Affiant

Name of Affiant

Sworn to and subscribed before me on this 9 day of August, 2022,
by above Affiant, who is personally known to me (X) or who has produced identification ().



Signature of Notary Public



Name of Notary, Typed, Printed, or Stamped

SUMMONS - PUBLICATION

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;
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

Summons by Publication (Diego
Rodriguez)
Judge Lynn Norton

Summons - Publication
TO: DIEGO RODRIGUEZ

You have been sued by 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, Plaintiffs,
in the District Court in and for Ada
County, Idaho, Case No. CV01-22-06789.

The nature of the claims against you
are: defamation; invasion of privacy;
intentional infliction of emotional
distress; trespass; unfair business
practices; wrongful charitable
solicitations; and civil conspiracy
to commit defamation, invasion
of privacy, intentional infliction of
emotional distress, trespass, unfair
business practices, and wrongful
charitable solicitations.

Any time after 21 days following the
last publication of this summons, the
court may enter a judgment against
you without further notice, unless prior
to that time you have filed a written
response in the proper form, including
the Case No., and paid any required
filing fee to the Clerk of the Court at
Ada County Courthouse, 200 West Front
Street, Boise, Idaho 83702 (208) 287-6900
and served a copy of your response on
the Plaintiffs' attorney at Holland &
Hart LLP, 800 West Main Street, Suite
1750, Boise, ID 83702 (208) 342-5000.

A copy of the Summons and Amended
Complaint can be obtained by
contacting either the Clerk of the
Court or the attorney for Plaintiffs. If
you wish legal assistance, you should
immediately retain an attorney to
advise you in this matter.

Dated: 7/13/22

PHIL McGRANE
ADA COUNTY DISTRICT COURT
(seal)

BY:/s/Erin Rowell
Deputy Clerk

Erik F. Stidham, Holland & Hart LLP,
800 West Main Street, Suite 1750, Boise,
ID 83702 (208) 342-5000

08/01/2022/ 08/08/2022 7252358

7252358

Exhibit C

Exhibit C

PO Box 953127 Lake Mary, FL 32795



Phone: 407.377.0400 | Fax: 407.377.0420

**PROOF OF PUBLICATION
ORLANDO, FLORIDA
ORANGE COUNTY, SEMINOLE COUNTY, OSCEOLA COUNTY**

In the Matter of : CV01-22-06789 Erik F. Stidham (ISB #5483) HOLLAND & HA...

First Publication: 7/27/2022

Last Publication: 8/17/2022

PROOF OF PUBLICATION

STATE OF FLORIDA

COUNTY OF ORANGE, SEMINOLE, OSCEOLA

Before me, the undersigned authority, personally appeared Michael Wagner, who on oath says that he is the Publisher of the Orlando Weekly, a weekly newspaper published at Orlando, in Orange County, Florida; that the attached copy of the advertisement was published weekly in the regular and entire edition of said newspaper in the issues of :

7/27/2022


8/3/2022

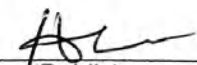
8/10/2022

8/17/2022



Affiant further says that the Orlando Weekly is a newspaper published in Orlando in said Orange County, Florida, and that the said newspaper has heretofore been continuously published in said Orange County, Seminole County, and Osceola County, Florida, each week for a period of one year preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission of refund for the purpose of securing this advertisement for publication in said newspaper.


Sworn to and subscribed before me by
Michael Wagner, who is personally known to me, this 17th day of August, 2022


Hollie Mahadeo (Notary Public)

Erik F. Stidham (ISB #5483) HOLLAND & HART LLP 800 W. Main Street, Suite 1750 Boise, ID 83702-5974 Telephone: 208.342.5000 Facsimile: 208.343.8869 E-mail: elstidham@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 Case No. CV01-22-06789 Judge Lynn Norton SUMMONS - PUBLICATION ST. LUKE'S HEALTH SYSTEM, LTD.; ST. LUKE'S REGIONAL MEDICAL CENTER, LTD.; CHRIS ROTH, an individual; and NATASHA D. ERICKSON, MD, an individual; and TRACY W. JUNG-MAN, 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. TO: DIEGO RODRIGUEZ You have been sued by 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. Plaintiffs, in the District Court in and for Ada County, Idaho, Case No. CV01-22-06789. The nature of the claims against you are: defamation; invasion of privacy; intentional infliction of emotional distress; trespass; unfair business practices; wrongful charitable solicitations; and civil conspiracy to commit defamation, invasion of privacy, intentional infliction of emotional distress, trespass, unfair business practices, and wrongful charitable solicitations. Any time after 21 days following the last publication of this summons, the court may enter a judgment against you without further notice, unless prior to that time you have filed a written response in the proper form, including the Case No., and paid any required filing fee to the Clerk of the Court at Ada County Courthouse, 200 West Front Street, Boise, Idaho 83702 (208) 287-6900 and served a copy of your response on the Plaintiffs' attorney at Holland & Hart LLP, 800 West Main Street, Suite 1750, Boise, ID 83702 (208) 342-5000. A copy of the Summons and Amended Complaint can be obtained by contacting either the Clerk of the Court or the attorney for Plaintiffs. If you wish legal assistance, you should immediately retain an attorney to advise you in this matter. DATED 7/27/2022. CLERK OF THE DISTRICT COURT Phil McGrane By/s/ Enc Rowell, Deputy Clerk.

Exhibit D

Exhibit D

[REDACTED]

From: Erik Stidham
Sent: Thursday, June 2, 2022 5:13 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: FW: St. Luke's/Rodriguez
Attachments: Redacted Amended Complaint - Filed.pdf

for the file

From: Erik Stidham
Sent: Thursday, June 2, 2022 5:11 PM
To: dr238412@me.com; drodriguez@powermarketing.net; ladyredluv@hotmail.com; diego@iol25.com; marketing@powermarketingconsultants.com
Subject: St. Luke's/Rodriguez

Dr. Mr. Rodriguez,

As you know, I represent the plaintiffs in the attached lawsuit. You have stated you are aware of the lawsuit that has been filed. See <https://www.freedomman.org/2022/st-lukes-is-suing-us-for-exposing-them/> (last visited June 1, 2022).

If you are represented by an attorney, please have your attorney contact me. If you are not represented by an attorney and will representing yourself in this matter, I ask that respond so that we can resolve any issues relating to service of legal process.

Thank you.

Erik Stidham
Partner, Holland & Hart LLP
800 W. Main Street, Suite 1750, Boise, ID 83702
T 208.383.3934 F 877.665.1698



CONFIDENTIALITY NOTICE: This message is confidential and may be privileged. If you believe that this email has been sent to you in error, please reply to the sender that you received the message in error; then please delete this e-mail.

From: Erik Stidham <EFStidham@hollandhart.com>
Sent: Wednesday, June 22, 2022 9:06 PM
To: dr238412@me.com; drodriguez@powermarketing.net; ladyredluv@hotmail.com; diego@iol25.com; marketing@powermarketingconsultants.com
Subject: RE: St. Luke's/Rodriguez
Attachments: Redacted Amended Complaint - Filed.pdf; 2022-05-11docK Summons as to D Rodriguez.pdf; 2022-06-17docA Summons Returned Executed as to Defendant Freedom Man Pac.pdf; 2022-06-03docB Order Granting Motion to Expedite Discovery.pdf

Mr. Rodriguez,

As you know, I represent the plaintiffs in the attached lawsuit. You failed to respond to my email below and to earlier efforts to connect with you.

You continue to make statements in the media acknowledging you are aware of the lawsuit. You have repeatedly represented you welcome the lawsuit. Nevertheless, you continue to dodge service and our efforts to establish lines of communication.

You have made public representations that you are represented by a team of lawyers. As requested previously, please have your attorney contact me as soon as possible. If, contrary to your public statements, you are intending to represent yourself in this litigation, please respond to me so that we can establish a line of communication regarding this litigation.

Further, as you assuredly are aware, you have an obligation to maintain evidence relevant to the dispute, including, but not limited to, the following: (1) all texts and email communications with Mr. Bundy relating to the underlying events, (2) email communications relating to the events at issue in the lawsuit, (3) financial records relating to money and benefits obtained from your solicitations, and (4) records of any changes you have made to web sites relating to the lawsuit.

Although you are not doubt aware of recent filings, we include some here in the hopes that you will stop engaging in delay.

Erik Stidham

Partner, Holland & Hart LLP
800 W. Main Street, Suite 1750, Boise, ID 83702
T 208.383.3934 F 877.665.1698



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HOLLAND & HART 



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From: Erik Stidham <EFStidham@hollandhart.com>
Sent: Friday, July 8, 2022 5:33 PM
To: dr238412@me.com; drodriguez@powermarketing.net; ladyredluv@hotmail.com; diego@iol25.com; marketing@powermarketingconsultants.com
Cc: aebundy@votebundy.com
Subject: RE: St. Luke's/Rodriguez
Attachments: 2022-06-02docA Amended Complaint and Demand for Jury Trial.pdf; 2022-06-02docB Redacted Amended Complaint and Demand for Jury Trial.pdf; 2022-06-28docA Amended Notice of Hearing.pdf; 2022-07-06docA Plaintiffs' Motion for Entry of Default as to Freedom Man Defendants.pdf; 2022-07-06docB Declaration of EF Stidham in Support of Motion for Entry of Default as to Freedom Man Defendants.pdf

Mr. Rodriguez,

If you are represented, please have your legal counsel contact me. If you intend to represent yourself in this lawsuit, please respond with an address and phone number that can be used to communicate with you.

We would like to avoid the further waste of money and time caused by your gamesmanship. Please cease the delay tactics and address the lawsuit in Court.

Your attorney can contact me at 208-342-5000. If you are representing yourself, you can contact me.

Attached are the following:

- Amended Complaint
- Redacted Amended Complaint
- Motion for Default
- Amended Notice of Hearing on Motion for Sanctions and Publication
- Declaration in Support of Default

Erik Stidham

Partner, Holland & Hart LLP

800 W. Main Street, Suite 1750, Boise, ID 83702

T 208.383.3934 F 877.665.1698



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Subject: St. Luke's/Rodriguez

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If you are represented by an attorney, please have your attorney contact me. If you are not represented by an attorney and will representing yourself in this matter, I ask that respond so that we can resolve any issues relating to service of legal process.

Thank you.

Erik Stidham

Partner, Holland & Hart LLP

800 W. Main Street, Suite 1750, Boise, ID 83702

T 208.383.3934 F 877.665.1698



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Exhibit E

Exhibit E

Where's Ammon Bundy? St. Luke's sued him for 'smear campaign.' Then this happened

Idaho Statesman

Ian Max Stevenson

June 30, 2022, 10:03 AM

Gubernatorial candidate Ammon Bundy and a close associate, Diego Rodriguez, have not cooperated with a defamation lawsuit filed against them by St. Luke's Health System, according to court documents.

Lawyers for St. Luke's have been unable to locate Rodriguez and serve him, while Bundy has been served but has not responded to the lawsuit, according to the documents.

And despite the litigation, both Rodriguez and Bundy have continued to make the kind of accusations the hospital system sued over, and which it asked an Ada County Court to require the two men to cease doing.

In May, St. Luke's [sued](#) alleging that Rodriguez and Bundy orchestrated a coordinated campaign to mislead followers about the circumstances of a child welfare case during an effort to get back custody of Rodriguez's grandson. The state took custody of the young child after authorities said they believed the child's weight-loss could be life-threatening.

The family disputed that, which led Rodriguez and Bundy to embark on a sustained publicity blitz, attacking the hospital — where the baby was briefly held for medical treatment — for “child trafficking” and other alleged crimes. The lawsuit vehemently denied the claims, calling the accusations a “knowingly dishonest and baseless smear campaign” aimed at furthering both of their political careers and earning money.

Bundy, who is running as an independent candidate and is known for far-right armed standoffs with law enforcement, sent out mass messages to his group of activists, called the People's Rights Network. [Multiple protests](#) were held outside of the hospital in Boise. On March 11, the night that local police took custody of Rodriguez's grandson, Bundy was arrested at the St. Luke's Meridian hospital for [misdemeanor trespassing](#).

Protesters went to the homes of government officials involved in the case and published information about those involved online.

On May 12, a process server gave legal papers to Bundy and a campaign staffer in Emmett, where Bundy lives. Since then, neither Bundy nor any lawyer on his behalf has filed responses in court.

Bundy did not respond to a text message request from the Idaho Statesman for comment.

The lawsuit accuses Bundy, his campaign, the People's Rights Network, Rodriguez and associated entities of defamation, invasion of privacy, intentional infliction of emotional distress, trespass, unfair business practices, violating of the Idaho Charitable Solicitation Act and civil conspiracy to commit defamation.

St. Luke's also told the court it quickly needed information about organizations linked to the two men: the People's Rights Network and Freedom Man PAC, a political action committee controlled by Rodriguez.

Ada County District Judge Lynn Norton granted the health system's request on June 3, ordering Bundy to respond to the questions within 14 days, according to court documents.

That did not happen.

On June 24, an attorney for the hospital, Erik Stidham, of the firm Holland & Hart, said in a filing that Bundy had not responded to the court's order "in any way," a document said. The attorney asked the court to sanction Bundy and to require him to sit for a deposition or hold him in contempt.

Bundy has spoken about the lawsuit in the press, stating in an interview that the lawsuit is “an opportunity to further expose them because they are pretty wicked,” Stidham’s filing said.

An amended summons, filed by the Ada County clerk, said that the court could enter judgment against Bundy and the People’s Rights Network if the parties fail to respond to the lawsuit.

The latest filings were first reported by the [Idaho Capital Sun](#).



Ammon Bundy, the far-right candidate for governor of Idaho, has not responded to St. Luke’s lawsuit against him. The health system has asked a court to sanction him.

Rodriguez also hasn’t responded

A process server attempted to serve Rodriguez with the lawsuit at four addresses in Meridian but could not locate him. The server also conducted “surveillance” at Bundy campaign fundraising event in Meridian in an attempt to locate Rodriguez. He was not there.

In an affidavit, Stidham said that “It appears that Mr. Rodriguez may no longer reside in Idaho.”

The attorney also noted that the state has filed a “significant tax lien” against Rodriguez, which the attorney said “creates concern that Mr. Rodriguez has left the state to avoid legal proceedings.”

A record of the lien, secured by the Idaho State Tax Commission and filed on Nov. 30, shows it amounted to \$138,393.

Since the lawsuit was filed, Rodriguez has written posts on his website about the activity, saying the health system is suing for his efforts at “exposing” the hospital and its “very wicked hands.”

“It’s not that he’s not aware of (the lawsuit), he’s just purposefully trying to avoid engaging with the process,” Stidham told the Statesman by phone.

In a text message, Rodriguez told the Statesman that he is living in another country, and he accused the hospital and law firm representing them of corruption and lying.

“I have been out of the country and I am now a resident of another country where I will be for any future hearings,” he said. “But I am both happy and willing to participate in all court hearings via Zoom.”

Rodriguez did not say what country he has moved to. He previously told the Statesman he was moving to Florida.

He accused the Holland & Hart firm of “untold numbers of corrupt actions against the citizens of Idaho,” for actions related to work done for current and prior government officials.

He also said he has not made any false statements about the actions of the hospital or others involved in his grandson’s child welfare case, but he believes he will lose in court.

“With the odds stacked against me, it will not matter what evidence is presented at this court trial — I will lose. I accept that,” he said.

In an email, Stidham said it is time for Rodriguez to participate in the legal proceedings.

“While dodging the legal process, Mr. Rodriguez continues to manufacture baseless, incoherent conspiracy theories about the hospital, the state government, and law firms,” he said. “The time has come for Mr. Rodriguez to stop running away from accountability.”

St. Luke’s has filed a motion asking for service by publication, which would mean publishing a summons to Rodriguez in a local newspaper.

A hearing on that motion, as well as the request to sanction Bundy, is scheduled to be held on July 12.

Exhibit F

Exhibit F



My Response to the Idaho Statesman Regarding the St. Luke's Lawsuit

My Response to the Idaho Statesman Regarding the St. Luke's Lawsuit

June 30th, 2022 | by Diego Rodríguez

Yesterday I received another text message from an Idaho Statesman reporter about news reports regarding the lawsuit from St. Luke's hospital against me and Ammon Bundy. Here is what the text said (actual screenshot):

6/29/22, 4:24 PM

Hi Diego, I'm working on a story about the St Luke's lawsuit. They hospital says they've made efforts to serve you, but that they haven't been able to locate you. They also said the state has entered a tax lien against you. Would you like to comment on the lawsuit?

Obviously, a newspaper article is only going to pick and choose certain statements to publish (not necessarily nefariously, but there's only so much room available in any given article), so I wanted to give you the entirety of my response here:

First of all, you can bet your bottom dollar that there will be NO REAL JUSTICE in any lawsuit against me or any other liberty minded individual in Ada County. Ada County is bought and paid for by Idaho's "deep state" which is a general cabal made up of Idaho's corrupt politicians, IACI, and other nefarious characters—all of which get their power and money by force—stealing from Idaho's citizens by way of Idaho State Government.

Both recent and past history have demonstrated that there is NO JUSTICE in Ada County. Period. Ammon Bundy was wrongfully prosecuted and found guilty, as well as Casey Baker, Aaron Von Schmidt and untold numbers of innocent Idaho citizens. The details of their court cases demonstrate gross constitutional violations on the part of judges and law enforcement, including at least one police officer who was forced to come back to the courthouse to recant his testimony after evidence was presented that he LIED UNDER OATH, and at least one judge denying Ammon Bundy the right to mention the Constitution in his own case. Any inquisitive citizen can find the details themselves—though the average citizen is too busy or too indifferent to care.

St. Luke's has also hired the Holland and Hart law firm which is the same law firm who has been involved in untold numbers of corrupt actions against the citizens of Idaho, all to enrich themselves. They have been the law firm who have taken hundreds of thousands (probably millions) of dollars from Idaho Citizens from payments they received directly from the Idaho State government. They got paid from Butch Otter, NonBinary Brad Little, and hoards of other state government politicians and corrupt state agencies.

They were the law firm who gave the "legal opinions" that were used to prop up fake and unlawful lockdowns during the COVID scam of 2020 and 2021. Now they have been hired by St. Luke's who also gets millions of dollars of funding from government—meaning that they again are taking money forcefully from the people. In short, by taking taxpayer dollars, essentially stealing from the people, they now have essentially unlimited funds to fight against me until the end of time.

So there will be no justice in this case other than PUBLIC EXPOSURE. With the odds stacked against me, it will not matter what evidence is presented at this court trial—I will lose. I accept that.

Nevertheless, I will do everything in my power to expose the corruption of St. Luke's Hospital and the Holland and Hart law firm. Their actions in Idaho over the course of decades have been unprincipled, corrupt, indefensible, and are direct attacks on the soul and conscience of the Idaho public.

They are suing me for publicly declaring **FACTUAL ACTIONS** that they have done/taken. Well, that is quite a waste of everyone's time because I am happy to publicly recant any single statement I have made and to publish retractions and/or to delete any previous articles or statements about St. Luke's hospital if they can demonstrate **ONE SINGLE, SOLITARY FACTUAL INACCURACY** that I have stated or published. It is as simple as that—no lawsuit necessary.

They can't and won't do that—because I have not made any false statements about them. On the other hand, they have lied repeatedly about me and my family and the entire Baby Cyrus case and this will be demonstrated both in and outside of the courtroom.

The truth is they are suing me as a means of intimidation—to demonstrate their power and to make me an example to anyone and everyone else who would dare challenge the power structure of Idaho.

As far as them not being able to serve me properly, well I can't hold that against them as I have been out of the country and I am now a resident of another country where I will be for any future hearings anyway. But I am both happy and willing to participate in all court hearings via Zoom which is the means by which Idaho courts forced Idaho citizens to use during the COVID scam anyway.

I do find it remarkable that they are claiming to not be able to get a hold of me—with all of their limitless resources. Yet Ian Stevenson, a singular individual reporter from the Idaho Statesman was able to do so within a few hours. Sounds to me like they're not trying very hard, or they're just lying.

And as for the state entering a tax lien against me as a result of this lawsuit—I don't know anything about it, but I wouldn't be shocked. It would just go to show **AGAIN** how corrupt and vile the Idaho court system is—how they could enter a judgment against me for a civil lawsuit where I have not been served, where no evidence has been presented, and where no court hearings have been held. That is called **INJUSTICE**, and it is par for the course in the State of Idaho.

NOTE - the reporter later clarified that the tax lien mentioned was not as a result of this lawsuit.

DIEGO RODRIGUEZ

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[Christians Response to Coronavirus is Shameful \(../2020/christians-response-to-coronavirus-is-shameful/\)](#)

ADDRESS:

9169 W State St. Suite 3177

Boise, ID 83714

[Freedom Man Links \(../links/\)](#)

SITE INFORMATION:

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[Terms and Conditions \(../terms-and-conditions/\)](#)

[Site Map \(../sitemap/\)](#)

[Contact Us \(../contact/\)](#)

SITE SECURED BY:

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Exhibit G

Exhibit G

From: Freedom Man Press <freedommanpress@protonmail.com>
Date: September 10, 2022 at 18:10:28 MDT
To: Erik Stidham <efstidham@hollandhart.com>
Subject: Interrogatories
Reply-To: Freedom Man Press <freedommanpress@protonmail.com>

External Email

Hello Erik -

This is Diego Rodriguez and I am writing in response to the mountain of letters and packages I recently received from you regarding the lawsuit against me.

I must say, I am impressed with your complete disregard for facts and your ability to blatantly lie without remorse or compunction. It is impressive that someone like you who earns your income by immorally attacking the lives of innocent people and who receives his pay from government and government-sponsored entities (meaning your paycheck comes from money stolen from the people), can even sleep at all.

And wow! The amount of lies you tell and your inability to frame any statement with truth is truly remarkable. Is it a gift, or just a habit borne out of years of sociopathic lying?

But what more should I expect from the law firm that is equally as responsible for protecting IACI's corruption, tyrannizing Idaho, propping up fraudulent COVID lockdowns, and sponsoring the gay agenda for years?

Regardless, we need to move forward with this lawsuit. After going through these mounds of paperwork, I see there is a section with "interrogatories," questioning the source of content on FreedomMan.org.

I'll make it simple for you—I am Freedom Man Press. The articles on the website are all written by me (unless otherwise noted). I also write under the pseudonym "Gunner Steele." I control the website, I post the content, and I write the articles. There is no formal organization—it's just me. FreedomMan.org is basically my own personal blog. Yes, it's that simple.

And as far as communicating with me in the future, the easiest way to do so is through email. This here is my actual email address: freedommanpress@protonmail.com. If you send me letters via regular mail, it may take weeks or months for me to receive them—if at all.

I will whitelist your email address, "efstidham@hollandhart.com" to ensure your messages don't go to the spam folder.

This will be the best and ONLY way to communicate with me since, as you know, I will be out of the country most of the time. As I write this email, I am in Florida, but my work takes me out of the country where I will be for the better part of the next 6 months to a year—facts which were totally lied about by you in your documents submitted to the court (I didn't leave Idaho to avoid a lawsuit as our move was planned before my grandson was even kidnapped).

But take no fear, I will be chronicling, in great detail, every LIE you tell and every falsehood you present during this trial. The history of Holland and Hart Law Firm and all of its corruption and promotion of homosexuality and child sexual abuse (according to Idaho Statute § 18-1506) will likewise be exposed. So this is an opportunity to better yourself, Erik!

And don't get too excited, because regardless of the fact that I am no longer physically present in Idaho, I still plan on participating in this lawsuit to the fullest. The courts are now fully equipped to handle distance court cases via Zoom, as we saw this method was actually forced on the people for the last 2 years. So you're not getting off that easy. You will see me in court regardless of how far away I may be.

I know you are used to bullying people around, controlling the courts, and breaking rules and laws to get what you want. I understand your law firm is in bed with the judges and the courthouse and IDHW and more. But this time, you're not going to get away with it. This time, you will have to answer for your wickedness and villainy.

And ultimately, whatever you do "get away with" in this world, the Lord Himself will punish you in the life which is to come.

Diego Rodriguez
Freedom Man Press

Exhibit H

Exhibit H

Diego Rodriguez
1317 Edgewater Dr.
Suite No. 5077
Orlando, FL 32804
Telephone: (208) 891-7728
Email: freedommanpress@protonmail.com

pro se

IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT

STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA

ST. LUKE'S HEALTH SYSTEM, LTD, et al.,
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;
AMMONBUNDY FOR GOVERNOR, a
political organization; DIEGO RODRIGUEZ,
an individual; FREEDOM MAN PRESS LLC,
a limited liability company; FREEDOM
MANPAC, a registered political action
committee; and PEOPLE'S RIGHTS
NETWORK, apolitical organization,

Defendants

CASE NO. CV01-19-15160

DEFENDANT'S RESPONSES TO
PLAINTIFFS FIRST SET OF
INTERROGATORIES TO DEFENDANT
DIEGO RODRIGUEZ

Defendant Diego Rodriguez ("Rodriguez") hereby responds to Plaintiffs First Set of
Interrogatories to Defendant Diego Rodriguez as follows:

INTERROGATORIES

INTERROGATORY NO. 1: Identify any person who controls, owns, or holds any

ownership interest in the website www.freedomman.org or in FMP.

RESPONSE TO INTERROGATORY NO. 1: Diego Rodriguez.

INTERROGATORY NO. 2: Identify the legal entity structure for FMP. This includes identifying the state of legal formation and the address of the principal place of business of FMP.

RESPONSE TO INTERROGATORY NO. 2: Objection, assumes facts not in evidence. Notwithstanding this objection, there is no official organization known as “Freedom Man Press, LLC. Rather, FreedomMan.org is my personal blog and it has been used in the past to promote the position(s) of the Freedom Man PAC, which was an Idaho-based Political Action Committee, that I was in charge of, that no longer exists. I am willing to meet and confer to supplement this response.

INTERROGATORY NO. 3: Identify any person who wrote, authored, edited, or otherwise contributed information or content relating to Natasha Erickson to www.freedomman.org. This includes, but is not limited to, the any person who wrote, authored, edited, or otherwise contributed content relating to Natasha Erickson on the pages (a) titled "People Responsible for Baby Cyrus's Kidnapping" and available at www.freedomman.org/cyrus/people-responsible and (b) titled "Child Trafficker Profile: Dr. Natasha Erickson. See CHILD TRAFFICKER PROFILE: DR. NATASHA ERICKSON and available at www.freedomman.org/cyrus/kidnappers/natasha-erickson.

RESPONSE TO INTERROGATORY NO. 3: I write all the articles (unless otherwise noted) on the website under both my personal name and the pseudonym “Gunner Steele.”

INTERROGATORY NO. 4: Identify any person who posted, published, or is authorized and capable of removing content at www.freedomman.org.

RESPONSE TO INTERROGATORY NO. 4: I write all the articles (unless otherwise

noted) on the website under both my personal name and the pseudonym “Gunner Steele.”

INTERROGATORY NO. 5: Identify all individuals, entities, or agents who are authorized to accept service of process for FMP. This includes identifying all individuals or entities who control or direct FMP, any registered agents, any managing member, President, or CEO of FMP and also identifying and providing the contact information for the identified individuals, entities, and agents.

RESPONSE TO INTERROGATORY NO. 5: Objection, assumes facts not in evidence. Notwithstanding this objection, there is no official organization known as “Freedom Man Press, LLC.” If necessary, I can accept service of process on behalf of FMP. I am willing to meet and confer to supplement this response.

DATED this 28th day of September, 2022.

By: /s/ Diego Rodriguez
Diego Rodriguez
Defendant

VERIFICATION

Diego Rodriguez, being first duly sworn upon oath, deposes and says that he has read the foregoing DEFENDANT’S RESPONSES TO PLAINTIFFS FIRST SET OF INTERROGATORIES TO DEFENDANT DIEGO RODRIGUEZ, and that the statements therein contained are true.

By: /s/ Diego Rodriguez
Diego Rodriguez
Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 28th day of September, 2022, I caused to be served a true and accurate copy of the foregoing document upon the following attorney(s) by the method indicated:

Erik F. Stidham HOLLAND & HART LLP 800 W. Main Street, Suite 1750 Boise, ID 83702	<input type="checkbox"/> U.S. Mail, postage pre-paid <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Delivery <input type="checkbox"/> Facsimile (208) 954-5950 <input checked="" type="checkbox"/> iCourt: efstidham@hollandhart.com
--	--

/s/ Diego Rodriguez
Diego Rodriguez
Defendant

Exhibit I

Exhibit I

Erik Stidham

From: Erik Stidham
Sent: Tuesday, October 4, 2022 3:49 PM
To: 'Freedom Man Press'
Subject: RE: Formal Response/Response to Rodriguez regarding depositions
Attachments: Relayed: RE: Formal Response/Response to Rodriguez regarding depositions

Mr. Rodriguez,

We are contacting the Court clerk. You will be copied. Again, we will be sending you a new Zoom link tomorrow for your deposition. We intend to admit to the deposition only the deponent, legal counsel, individuals who are parties, and a representative of the legal entities. If you intend for there to be a representative of the Freedom Man Pac at the deposition, please identify that person.

The attached indicates when the meet and confer email was sent to you.

We intend to seek further costs and fees associated with your antics which we believe are improper and conducted for improper purposes.

Erik Stidham
(he/him/his)

Partner, Holland & Hart LLP

800 W. Main Street, Suite 1750, Boise, ID 83702

T 208.383.3934 F 877.665.1698 M 208.283.8278



CONFIDENTIALITY NOTICE: This message is confidential and may be privileged. If you believe that this email has been sent to you in error, please reply to the sender that you received the message in error; then please delete this e-mail.

From: Freedom Man Press <freedommanpress@protonmail.com>
Sent: Tuesday, October 4, 2022 3:03 PM
To: Erik Stidham <EFStidham@hollandhart.com>
Subject: RE: Formal Response/Response to Rodriguez regarding depositions

External Email

Erik -

Once again, you are telling lies and you have to stop. Let's review:

1. I did send out an email broadcast to friends and supporters asking them to login to the Zoom deposition tomorrow. And why wouldn't I? This is a deposition which is part of a hearing, and hearings are public. So yes, it makes sense to have supporters attend.

2. I have no intention of "disrupting" the deposition, but I find it interesting that you immediately assume that having friends and family in attendance denotes "disruption." According to textbook psychology, your tendency to assume such things only demonstrates that this is how you yourself operate. There is likewise no reason to assume that my friends and family sitting quietly and observing a deposition is "defamation or intimidation." On the contrary, you continue to defame me by making false claims in numerous documents you've issued to the court. If anyone is defaming and intimidating, it is Erik Stidham and Holland and Hart Law Firm.

3. As far as there being "no right for the public to attend a deposition," well since a deposition is part of a court hearing, the Idaho Constitution, which is the highest law in Idaho applies and it clearly states, "Courts of justice shall be open to every person, and a speedy remedy afforded for every injury of person, property or character, and right and justice shall be administered without sale, denial, delay, or prejudice." Idaho Constitution Article 1, Section 18. (<https://legislature.idaho.gov/statutesrules/idconst/ArtI/Sect18/>)

4. Additionally, I am not "acting for an improper purpose." I don't even know what that means, but I assume it is some legal jargon you are attempting to use to prove a non-existent point. The purpose for which I am acting is to simply obey and subordinate myself to the Idaho Constitution which guarantees me the right to have this hearing in public. If anybody is acting for an improper purpose, it's YOU, Erik! What are you afraid of? What are you trying to hide? What is it about peaceful people sitting and watching you work that terrifies you so much? What improper purpose are you acting upon, Erik? This email from you shall be taken into account as Erik Stidham "acting for an improper purpose."

5. And if your position is that only party's representatives may attend, then great! As a party myself, I am giving an invitation to my friends and family to be representatives and attend the deposition. It's as simple as that. I expect you to abide by the Idaho Constitution and allow my representatives to attend via Zoom who I have invited to attend the deposition.

6. As far as responding by 1:30 pm, that is laughable since you didn't sent the email until 1:51 pm your time, which was 2:51 pm my time.

I look forward to being on the deposition tomorrow morning at 8:30 am, Mountain Time, using the link you have already sent, which will also be attended by invited friends and family of mine who are acting as my "representatives."

Diego Rodriguez
Freedom Man Press

----- Original Message -----

On Tuesday, October 4th, 2022 at 2:51 PM, Erik Stidham <EFStidham@hollandhart.com> wrote:

Mr. Rodriguez,

We have received a copy of an email you broadcast to an undisclosed group of folks this morning. The email encourages an undisclosed group to log in to the Zoom deposition. In line with your prior gamesmanship, your tactics and the language you employ reflect an attempt to disrupt tomorrow's limited deposition, continue to make defamatory statements, and seek to intimidate my clients, my law firm and me.

Consider this email my attempt to meet and confer.

There is no public right to attend depositions. *See, e.g., Murphy v. United States*, 2017 U.S. Dist. Lexis 205028. You are acting for an improper purpose. You clearly are misleading folks to use them as surrogates to intimidate my clients and disrupt the proceeding. Further, you purposely employed the defamatory language in the email relating to me and my firm in a foolish attempt at intimidation.

We demand that you withdraw the direction to have your supporters log in to the zoom hearing. Further, we plan on having the court reporter create a new Zoom link and also set up the system so that the court reporter must admit each person individually to the email. Our position is that only parties or party representatives should attend the deposition. We would provide you with the new Zoom link immediately prior to the deposition.

We plan on bringing all of this to the Court's attention, along with your gamesmanship and refusal to be candid in the prior email exchanges. We will seek fees, protective orders as needed and sanctions.

Please advise immediately if you are willing to withdraw the email solicitation, stop with the attempted intimidation, and agree to proceed with attendance at the deposition limited to parties, a single representative for each party, and lawyers for the parties.

If we do not hear from you by 1:30pm, we will contact the Court and take appropriate action.

Seth and Jeremy,

Are you representing Mr. Rodriguez as counsel? Did you review his email this morning before it went out to his followers? Did you advise him to send the email?

Erik Stidham

Partner, Holland & Hart LLP

800 W. Main Street, Suite 1750, Boise, ID 83702

T 208.383.3934 F 877.665.1698 M 208.283.8278



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From: Freedom Man Press <freedommanpress@protonmail.com>
Sent: Monday, October 3, 2022 10:41 PM
To: Erik Stidham <EFStidham@hollandhart.com>
Cc: seth@idahoinjurylawgroup.com; Jeremy Litster <jeremy@idahoinjurylawgroup.com>;
mom@lareinachavoya.com
Subject: Re: Formal Response/Response to Rodriguez regarding depositions

External Email

Erik -

First of all, thank you for clarifying the date of the email with the zoom link—I have found it and see it is as follows:

Deposition of Diego Rodriguez

Time: Oct 5, 2022 08:30 AM Mountain Time (US and Canada)

<https://us02web.zoom.us/j/84012190458?pwd=UTJZVk1oNEtXZ1lhdytrRVU2ajhJdz09>

Meeting ID: 840 1219 0458

Passcode: 807207

Second, I never "objected" or "refused" to take part in the deposition on October 5th as you stated below. I simply am objecting to the order which stipulates that I pay for the deposition. And yes, I also object, for the 3 reasons already mentioned, to the issuance of the order as it was and is clearly an inappropriate order. But I never refused to take part in the deposition.

So yes, while I am cataloguing all of your repeated, continual, and abhorrent lies to present in court when the opportunity comes, I will not include this as a one of those lies, as I will give you the benefit of the doubt and assume that you simply *misunderstood*, and not that you intentionally lied. *After all, someone like you who is confused as to how many genders there are, who supports sexual perversion, "gay pride," and child drag shows, and who condones the LGBTQ+ "pronoun game," is definitely going to be confused about lots of additional things.*

So as already indicated, I have no problem with answering your questions and I plan on being on the deposition via Zoom using the link you sent me above on Wednesday at 8:30 am Mountain Time.

Diego Rodriguez

Freedom Man Press

----- Original Message -----

On Monday, October 3rd, 2022 at 10:49 PM, Erik Stidham <EFStidham@hollandhart.com> wrote:

Mr. Rodriguez,

I am away from my computer so this is not a complete response. But here are a few immediate issues.

I understand that you are objecting and refusing to participate in the deposition on October 5.

The Zoom link was sent to you in the email from me dated September 28.

We will bring to the Court's attention that you refuse to proceed on October 5th based on your supposed objections, that you refused to provide your location for several days, and seek fees and further assistance from the Court.

Thank you.

Erik Stidham

Sent from my iPhone

On Oct 3, 2022, at 19:57, Freedom Man Press
<freedommanpress@protonmail.com> wrote:

External Email

My responses are below:

Diego Rodriguez

Freedom Man Press

----- Original Message -----

On Friday, September 30th, 2022 at 11:03 AM, Erik Stidham
<EFStidham@hollandhart.com> wrote:

Mr. Rodriguez,

I reviewed the email and the ex parte communications you sent to the Court. I am not sure what you are asking so I will state my clients' position.

First, we intend to take your deposition on October 5 at the time designated in the Notice. You have the Zoom link. The court reporter and videographer will be located in Boise. In prior correspondence, you indicated that you thought the Order did not apply to you and implied you would not be participating. Your last email seems to indicate that you will participate in the deposition via Zoom on October 5. Please clearly

indicate whether you will be appearing for your deposition via Zoom on October 5. If you are objecting to the deposition, we need to know now so that we can file the appropriate motion with the Court.

First of all, I don't have any zoom link.

Second, my point was that the order was entirely confusing since it stated that "Ammon Bundy" was ordered to sit for the deposition and not me. It later states, *"By September 16, 2022 Plaintiffs must provide Defendant Bundy with three possible dates for the deposition between September 27, 2022 and October 7, 2022."* It then goes on to state *"Defendant Rodriguez is ORDERED to attend the deposition on the date and time provided on the filed Notice of Deposition."*

That is entirely confusing and no reasonable person could be expected to know with certainty WHO it is that is being ordered to do *what*. You obviously know that binding legal documents and orders must be perfectly accurate and/or least clear in order for them to hold validity.

Judge Norton in this case has already demonstrated her keen awareness of this aspect of the law as she previously delayed an order based on the fact that you failed to list the address of the courthouse. ***So she is properly and appropriately abiding by good standards of jurisprudence.*** And I expect her to continue judging and acting appropriately.

Additionally, I responded to the case within the legal timeframe, so it is/was not proper to issue an order when I was fully within the legal time allotted for responding.

Finally, as a third reason why I object to the deposition is the simple fact that I have already fully answered your 5 interrogatories. So it is evident that you have no other goal than to try to bring unnecessary financial stress on me while being able to bill your clients for more money on your end. If you have more discovery questions you'd like to ask, ask them. I'm happy to respond to any question relative to this case.

But these 3 reasons are more than sufficient to demonstrate that this deposition is not meritorious in the context of properly moving the case forward and is solely being used for other purposes.

Second, as soon as possible, we need to know where you will be for your deposition on October 5. As previously indicated, depending on your location, we likely can arrange to have the deposition conducted in person. In general, our preference is to depose you in person. Your refusal to provide your location on October 5 is frustrating especially since we are dubious as to whether you really are out of the country.

As I already told you, I am in Mexico. Specifically, I am in Benito Juarez, though tomorrow, I might have to travel to Mexico City. If that is the case, I will know in the late afternoon.

Third, my clients are not waiving any rights. My clients are not agreeing to forgo seeking attorneys' fees or costs. You have known fully about this lawsuit for months, boasted in the media, and played games regarding service. You have knowingly caused significant amounts of money to be spent unnecessarily in this litigation. Plus, you have continued to defame my clients. I would not be candid if I indicated to you that my clients were willing to forego recovery of costs and fees where and when appropriate.

Erik, you must stop telling lies. It is not good for you, for your client, or for anyone involved in this case. I never "played games regarding service." That is a bald faced lie and you know it. I simply moved out of Idaho and my plans to do so were months in advance of my grandson ever being kidnapped. So you are simply lying. And the fact that I knew about the lawsuit because I openly stated that I downloaded a copy of the initial lawsuit on a news website certainly doesn't qualify as legal service. You know that. So stop lying. You're the one playing games with words and actions. If you cared about the case, you'd simply file things correctly, without error, and you'd obey the letter of the law without trying to rack up additional billing hours for your client.

Fourth, while the October 5 deposition will be limited in scope, we do intend to ask follow-up and clarifying questions regarding the subject matter of the

interrogatories and want to have the responses provided under oath.

That's fine if you have additional questions you want to ask that are relevant to the case. If the judge feels a deposition is in order, then we can conduct one via zoom at *your expense*. Otherwise, I'm happy to answer any additional questions you might have that are relevant to the case, and even file them as affidavits and have them signed by a notary public. Unlike your client, I did nothing wrong. And I haven't made a single statement about your client(s) that is false. Every statement I ever made is either 100% true, or I 100% believed it to be true when I stated it (and still do). Your clients, on the other hand, are actively and daily engaging in child trafficking—taking money for babies that are put in their care after being kidnapped by force, and are profiting off of it. You, likewise, are now complicit in their crimes. Whether you ever face justice in this world or not, you will stand before God for your crimes.

Finally, I assume you saw the Court's order regarding ex parte communications. Please stop with the improper communications and copy us on future substantive communications with the Court.

I did get that and I did see it. It was a simple and honest mistake as I was simply trying to seek clarification from the judge for what I was supposed to do since I have no idea how this process works. So you can revel in the fact that you have the legal upper-hand. You can work your legal manipulation to your heart's content since I am stuck learning this all slowly, step-by-step, getting help from Court Assistance, YouTube Videos, legal websites, and Lexis Nexis searches. So yeah, I admit, it sucks.

Erik Stidham

Partner, Holland & Hart LLP
800 W. Main Street, Suite 1750, Boise, ID 83702
T 208.383.3934 F 877.665.1698



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please reply to the sender that you received the message in error; then
please delete this e-mail.

From: Erik Stidham
Sent: Wednesday, September 28, 2022 2:30 PM
To: 'Freedom Man Press'
<freedommanpress@protonmail.com>
Subject: RE: Formal Response

Mr. Rodriguez,

I will review what you have provided and get back to
you tomorrow.

Thank you.

Erik Stidham
Partner, Holland & Hart LLP
800 W. Main Street, Suite 1750, Boise, ID 83702
T 208.383.3934 F 877.665.1698



CONFIDENTIALITY NOTICE: This message is confidential and may be
privileged. If you believe that this email has been sent to you in error,
please reply to the sender that you received the message in error; then
please delete this e-mail.

From: Freedom Man Press
<freedommanpress@protonmail.com>
Sent: Wednesday, September 28, 2022 1:43 PM
To: Erik Stidham <EFStidham@hollandhart.com>
Subject: Formal Response

External Email

Mr. Stidham,

I write this email in a good faith effort to meet and confer with you regarding my responses to the interrogatories and the upcoming deposition. I am attaching a more formal response to the interrogatories here in this email. As you will recall, I substantively sent you these same responses in an email to you on September 10, 2022.

First, did my responses answer your questions? Is there any further clarification that you need from me regarding my responses to the 5 questions?

Second, my position is that the court lacked jurisdiction to enter any order against me until I appeared in this case or until the court took default against me (which could only happen after proper service and notice). As I stated in my previous email, I am willing to sit for a deposition via zoom. I am also willing to sit for an in-person if you want to fly to Mexico or wherever I am that week for work. However, this is conditioned on an agreement that St. Luke's will not seek an award of attorneys fees for and costs incurred in seeking the responses to these 5 questions (this includes but is not limited to filing the motion for sanctions, appearing at the hearing on September 6, 2022, and in taking my deposition).

Please let me know your position as soon as possible. I plan to file a motion to reconsider the Sept 8th Order, and a motion for a protective order if we cannot come to an agreement.

Best,

Diego Rodriguez

Freedom Man Press

Exhibit J

Exhibit J

IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF
THE STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA

----- x Case No. CV01-22-06789
:
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. :
:
----- x

REMOTE VIDEORECORDED DEPOSITION OF DIEGO RODRIGUEZ - VIA ZOOM

October 5, 2022

Reported by
Tiffany Fisher, RPR, CRR
CSR No. 979

W I T N E S S

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DIEGO RODRIGUEZ

Examination by Mr. Stidham..... 6

* * * * *

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* * * * *

REMOTE VIDEORECORDED DEPOSITION OF DIEGO RODRIGUEZ,
taken at the instance of the Plaintiffs, VIA ZOOM, commencing
at 8:40 a.m., on October 5, 2022, before Tiffany Fisher, RPR,
CRR, Court Reporter, a Notary Public in and for the State of
Idaho, pursuant to notice, and in accordance with the
applicable rules of procedure.

A P P E A R A N C E S:

FOR THE PLAINTIFFS

Erik F. Stidham
Zach McCraney
HOLLAND & HART, LLP
800 West Main Street, Suite 1750
Boise, Idaho 83702
(208) 342-5000
efstidham@hollandhart.com
Aubrey Lyon
David Barton
ST. LUKE'S HEALTH SYSTEM
190 East Bannock Street
Boise, Idaho 83712
(208) 706-6785
lyona@slhs.org
bartond@slhs.org

FOR DEFENDANT DIEGO RODRIGUEZ

Diego Rodriguez, pro se
freedommanpress@protonmail.com

ALSO PRESENT

Tracy Jungman

VIDEOGRAPHER

Spencer Harrison, Tucker & Associates

1 ZOOM DEPOSITION

2 October 5, 2022, 8:40 a.m.

3
4 THE VIDEOGRAPHER: Okay. We are now on the
5 record. Please silence your cellphones and place
6 them away from any microphones. Recording will
7 continue until all parties agree to go off the
8 record.

9 My name is Spencer Harrison,
10 representing Tucker & Associates. Today is
11 Wednesday, October 5th. The time is approximately
12 8:40 a.m. This deposition is being held remotely
13 via Zoom.

14 The caption of this case is St. Luke's
15 Health System vs. Ammon Bundy. Case number is
16 No. CV01-22-06789. The case is filed in the
17 District Court of the Fourth Judicial District of
18 the State of Idaho, in the County of Ada.

19 The name of the witness is
20 Diego Rodriguez.

21 Will the attorneys in the room or, in
22 this case, attending remotely identify themselves
23 and the parties they represent.

24 MR. STIDHAM: This is Erik Stidham of
25 Holland & Hart, representing the plaintiffs.

Page 5

1 Also from Holland & Hart is
 2 Zach McCraney, who is also here. And then I'll
 3 also identify in-house counsel, David Barton.
 4 MR. BARTON: Good morning.
 5 MR. STIDHAM: And in-house counsel,
 6 Aubrey Lyon, for St. Luke's Health System.
 7 Also on is one of the individual
 8 plaintiffs, Ms. Jungman.
 9 THE VIDEOGRAPHER: Any other attorneys
 10 attending remotely?
 11 All right. Our court reporter,
 12 Tiffany Fisher, will swear the witness, and we can
 13 proceed.
 14 THE REPORTER: Would you raise your right
 15 hand, please.
 16 Do you solemnly swear or affirm that
 17 the testimony you shall give today will be the
 18 truth, the whole truth, and nothing but the truth?
 19 THE WITNESS: Yes.
 20
 21 DIEGO RODRIGUEZ,
 22 produced as a witness at the instance of the
 23 Plaintiffs, having been first duly sworn, was
 24 Examined and testified as follows:
 25 ///

Page 6

1 EXAMINATION
 2 BY MR. STIDHAM:
 3 Q. Mr. Rodriguez, my name is Erik Stidham,
 4 and I represent the plaintiffs in this matter.
 5 As an initial question, have you ever
 6 had your deposition taken before?
 7 A. No.
 8 Q. Let me go over some of the ground rules
 9 so it will hopefully make the exchange more
 10 efficient. First, if I ask you a question,
 11 Mr. Rodriguez, and for any reason you don't
 12 understand it, please ask me to rephrase it and
 13 I'll do my best to rephrase it.
 14 Is that fair?
 15 A. Fair enough.
 16 Q. And if I ask you a question,
 17 Mr. Rodriguez, and you answer, I will assume you
 18 understood it.
 19 Fair?
 20 A. Fair.
 21 Q. Another thing I should state is I have
 22 a bad habit of pausing in the middle of my
 23 questions. Please do your best to let me complete
 24 the question before you respond. That way we will
 25 avoid, hopefully, speaking over one another and

Page 7

1 making it difficult for the court reporter.
 2 Is that fair?
 3 A. Sure.
 4 Q. Also, Mr. Rodriguez, it's not an
 5 endurance contest. If you need to take a break
 6 for some reason and there's not a question
 7 pending, we'll do our best to accommodate that.
 8 Is that fair?
 9 A. Sounds good.
 10 Q. Also, even though we're on video, it is
 11 being transcribed. So it's required that you
 12 respond verbally, not just with a gesture or a
 13 head shake.
 14 Do you understand that?
 15 A. Sure, no problem.
 16 Q. Okay. All right. And, also, do you
 17 understand that you're under oath, and you're
 18 sworn to tell the truth just as if you were in a
 19 court of law?
 20 A. Yes, I do.
 21 Q. Okay. Also, is there anyone else in
 22 the room with you?
 23 A. Nope.
 24 Q. Okay. And let me ask you this.
 25 What, if anything, did you do to

Page 8

1 prepare for your deposition?
 2 A. Nothing.
 3 Q. Did you meet with anybody to prepare
 4 for your deposition?
 5 A. Nope.
 6 Q. Did you meet with any attorneys to
 7 prepare for your deposition?
 8 A. To prepare for my deposition? No. Do
 9 I have friends who have given me tips and advice?
 10 Yes. Have I met with anybody specifically to
 11 prepare for a deposition? No.
 12 Q. All right. Let me try to rephrase it,
 13 then.
 14 Have you met or spoken with anybody in
 15 order to prepare for your deposition?
 16 A. Define what you mean by preparing for
 17 the deposition.
 18 Q. Well, I meant it broadly, sir, so I
 19 could hopefully encapsulate the question broadly.
 20 You don't understand what "prepare"
 21 means?
 22 A. I don't understand what you're trying
 23 to get at, in terms of the question.
 24 But have I spoken to people about the
 25 deposition? Absolutely.

Page 9

1 Q. Have you spoken with folks in an effort
2 to prepare yourself to respond to the questions?

3 A. No.

4 Q. Thank you.

5 Have you reviewed any documents to
6 prepare yourself for the deposition?

7 A. I've reviewed many of the documents
8 that you guys sent to me. I've done all types of
9 searching on the Internet in terms of what is a
10 deposition, what is its purpose, how does it go,
11 things like that. But that's basically it.

12 Q. Okay. Would you state --

13 A. You sent me some documents this
14 morning. I haven't had a chance to look at those
15 because you just barely sent those. But it looks
16 like, from what I could see, just a bunch of
17 screenshots from my website.

18 Q. What those were or are, are the
19 documents, depending on how the deposition
20 progresses, we may use as exhibits to your
21 deposition. I provided them to you in case it's
22 easier for you to open them up on your laptop in a
23 PDF, rather than just follow them when I put them
24 on the screen. So they're just provided there as
25 a convenience in case we need to reference them.

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1 A. Okay.

2 Q. Do you understand that?

3 A. Sure.

4 Q. Okay. Also, will you state your full
5 name for the record.

6 A. Diego Rodriguez.

7 Q. No middle name?

8 A. Diego Jesus Rodriguez.

9 Q. Thank you.

10 And what is your date of birth,
11 Mr. Rodriguez?

12 A. March 5, 1978.

13 Q. Thank you. And where do you reside?

14 A. In Florida.

15 Q. Could you give me your address?

16 A. It's the address you already have on
17 file.

18 Q. That's not accurate, sir. The address
19 we have on file is a virtual address. I'm asking
20 for where you reside.

21 A. Yeah. No, I object to that question.

22 Q. Why?

23 A. Because it's none of your business.

24 Q. Okay. Mr. Rodriguez, we need to know
25 your residence for a number of reasons. We're

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1 entitled to it. It's a simple background
2 question.

3 I will tell you this, if you have any
4 concerns about your address being disclosed
5 publically or things like that, I'm happy to
6 accommodate that.

7 But would you please answer the
8 question as to where you reside?

9 A. No, I object to that question.

10 Q. So you're refusing to answer where you
11 reside?

12 A. The address that you have is the only
13 address you're going to get.

14 Q. Do you reside at the address that I
15 have?

16 A. I don't live there.

17 Q. All right. Where are you now?

18 A. I'm in Mexico.

19 Q. Where in Mexico?

20 A. In Benito Juárez, Mexico.

21 Q. Where in Benito Juárez?

22 A. In Benito Juárez.

23 Q. Give me the address -- please identify
24 the address where you are in Benito Juárez.

25 A. I object to the question. It's not

Page 12

1 relevant.

2 Q. Why?

3 A. Because it's not relevant. Why do you
4 need to know where I am? It's irrelevant.

5 Q. How long have you been in
6 Benito Juárez?

7 A. Again, irrelevant.

8 Q. When did you get to Benito Juárez
9 recently?

10 A. Irrelevant.

11 Q. Why is it irrelevant, sir? You've made
12 several representations --

13 A. Why is it relevant? Why is it relevant
14 to you, is the question. Where I am on a Zoom
15 meeting is not relevant. I am here. If I was in
16 Timbuktu, it doesn't matter. I'm here on this
17 call, and so we should continue the deposition.

18 Q. When did you get to Benito Juárez, sir?

19 A. Again, I'm objecting because it's not
20 relevant to the deposition.

21 Q. It is relevant. Well, let me just
22 explain --

23 A. It's not relevant.

24 Q. Let me explain why I believe it's
25 relevant so that you can consider that before you

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1 continue to refuse to answer. All right?
 2 It's relevant because you've made
 3 several representations to me and to the Court as
 4 to your residence that affect our ability to move
 5 forward with this. We are concerned that you're
 6 not being truthful or honest regarding your
 7 location. You continue to be evasive about it,
 8 which complicates and creates additional cost.
 9 So, again, sir, would you tell me when
 10 you got to Benito Juárez?

11 A. The answer to your question is that
 12 none of what you just said is relevant to any
 13 case. If there's anybody who is being untruthful,
 14 Erik, it's you. I have a catalog and a list of
 15 all of the lies you've told and all of the
 16 documents you've submitted.

17 Where I'm physically located right now
 18 is not relevant. And so when I get here and when
 19 I leave and go and come back is not relevant at
 20 all. But I do work down here in Mexico. And I
 21 come, and I go, and I come, and I go.

22 And so when we have a deposition or if
 23 we have a hearing and I happen to be in Florida,
 24 I'll be logging in from Florida. If I happen to
 25 be in Mexico, I'll be logging in from Mexico. If

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1 I happen to be in China, I'll be logging in from
 2 China. But I will be at these hearings.

3 Q. All right. So just as a preliminary
 4 question, hopefully, and then we'll move on and
 5 I'll have to address it with the Court, are you
 6 taking the position that you are never going to
 7 share with me for the purposes of arranging
 8 depositions and other events in this case where
 9 you are residing?

10 A. You're never going to get any address
 11 that belongs to me other than what you already
 12 have.

13 Q. Okay. Are you ever going to be willing
 14 to share where you're located so that we can
 15 arrange depositions, most particularly yours, in
 16 person?

17 A. I'm not going to share with you where
 18 I'm at, at any particular point in time, no. It's
 19 not relevant.

20 Q. So you're refusing to ever allow us to
 21 take your deposition in person?

22 A. Not necessarily.

23 Q. Well, how are we going to do that, sir,
 24 if you're not going to be willing to share where
 25 you're located?

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1 A. Well, like I told you right now, I'm in
 2 Benito Juárez. You could have set one up here,
 3 but it's just as easy to do it over Zoom.

4 Is there any reason why you don't want
 5 to do it over Zoom? Is this insufficient for you?
 6 We've done it this way for two years in the state
 7 of Idaho. So why is it, all of a sudden,
 8 insufficient for you, Erik?

9 Q. Mr. Rodriguez, please just respond to
 10 the questions.

11 So one more time --

12 A. I am responding to the question.

13 Q. Sir, Mr. Rodriguez, this is not
 14 theater. Please just answer the questions.

15 Where are you located right now?

16 A. I already told you, and I'll tell you
 17 again. I'm not going to tell you where I am in
 18 terms of my address. I am in Mexico, period.

19 Q. Okay. And you will not give us your
 20 residence in Florida; is that fair?

21 A. I'm not going to give you any address
 22 that belongs to me other than that what you
 23 already have.

24 Q. Mr. Rodriguez, are you on any
 25 medication that would affect your ability to

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1 answer truthfully today?

2 A. No.

3 Q. Any other --

4 A. Are you on any medication, Erik, legal
 5 or illegal? Are you taking any illegal drugs?

6 Q. Mr. Rodriguez, please just answer the
 7 questions.

8 A. Please just answer my question. Are
 9 you taking any illegal drugs?

10 Q. Mr. Rodriguez, that's not how this
 11 process works. Please let me ask you the
 12 questions.

13 A. Sure.

14 Q. Are there any other issues that affect
 15 your ability to provide truthful and accurate
 16 testimony today?

17 A. Nope.

18 Q. Okay. Mr. Rodriguez, can you just -- I
 19 just want some background at a high level, and
 20 then we can move on. We'll get into your
 21 background in more detail in subsequent
 22 depositions, but let me ask you this.

23 Have you graduated from high school?

24 A. Yes.

25 Q. Have you graduated from any secondary

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1 A. All right.
 2 (Brief pause in the proceedings.)
 3 **Q. Mr. Rodriguez, I have just got a couple**
 4 **of questions. Let me just share my screen.**
 5 A. Okay.
 6 **Q. Mr. Rodriguez, what should be in front**
 7 **of you, and I'll represent to you it's a -- I have**
 8 **accessed the FreedomMan.org website.**
 9 **Do you see that?**
 10 A. Okay. Yep.
 11 **Q. And then if we go down to the bottom of**
 12 **the -- and I'll represent to you this is as it's**
 13 **reflected now, when I'm accessing it during your**
 14 **deposition.**
 15 A. Okay.
 16 **Q. If we go down to the bottom of the**
 17 **website, there's a current reference to an address**
 18 **at 317 Edgewater Drive, 507; correct?**
 19 A. Yep.
 20 **Q. Okay. And that's a virtual address;**
 21 **correct?**
 22 A. Correct.
 23 **Q. Okay. Then if we look at "Freedom Man**
 24 **links," I'm just going to click on it.**
 25 **Are you the individual who established**

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1 **what is, I think, the opening page or home page, I**
 2 **should say, of the Freedom Man website. You**
 3 **should have that on your screen now.**
 4 A. Yes.
 5 **Q. Does that look to be accurate?**
 6 A. Yes.
 7 **Q. Okay. And then if we look at the**
 8 **latest news articles among them, is the article**
 9 **that's in yellow that identifies "Baby Cyrus was**
 10 **kidnapped"; correct?**
 11 A. Correct.
 12 **Q. Okay. And below that is, "St. Luke's**
 13 **is suing us for exposing them"; correct?**
 14 A. Yep, correct.
 15 **Q. And then a little bit further up,**
 16 **you've got, "My response to the Idaho Statesman**
 17 **lawsuit regarding the St. Luke's lawsuit."**
 18 **Do you see that?**
 19 A. Yep.
 20 **Q. Okay. And those are all stories that**
 21 **are currently in place on the FreedomMan.org**
 22 **website; correct?**
 23 A. Correct.
 24 **Q. Okay. I'm going to -- Mr. Rodriguez,**
 25 **if this looks to be a true and accurate reflection**

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1 **these links on the FreedomMan.org website?**
 2 A. Yes.
 3 **Q. Okay. Idaho websites, the first one**
 4 **there is People's Rights; correct?**
 5 A. Yep.
 6 **Q. And you placed that link on there;**
 7 **correct?**
 8 A. Yes.
 9 **Q. Okay. Are you the individual who**
 10 **interfaces with People's Rights Network on behalf**
 11 **of FreedomMan.org?**
 12 A. Well, there is no official
 13 People's Rights organization of any type or sort.
 14 So am I -- do I interface with people who identify
 15 themselves as members of the People's Rights
 16 Network? Yeah, all the time. Lots of my friends
 17 are part of the People's Rights Network.
 18 **Q. Okay. I'm going to -- Mr. Rodriguez,**
 19 **I'm going to make a screenshot of this link to**
 20 **pro-freedom websites, including the Freedom Man --**
 21 **excuse me, including the People's Rights link here**
 22 **and make that Exhibit 7 to your deposition. Okay?**
 23 A. Okay.
 24 (Exhibit 7 marked.)
 25 **Q. All right. I'm going to go back to**

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1 **of the current home page, I'm going to have that**
 2 **made as Exhibit 8 to your objection.**
 3 **Any objection to --**
 4 A. Sounds good. No objection to that.
 5 (Exhibit 8 marked.)
 6 **Q. Okay. Mr. Rodriguez, have you modified**
 7 **any of the content on the FreedomMan.org website**
 8 **relating to Dr. Erickson based on allegations in**
 9 **the lawsuit that you've defamed her?**
 10 A. No, not that I can recall.
 11 MR. STIDHAM: Okay. That's where we'll
 12 stop, Mr. Rodriguez. I appreciate your patience.
 13 I'm sure we'll be interacting in the future in
 14 this litigation, but I appreciate your patience
 15 today. Thank you.
 16 THE WITNESS: Sure thing.
 17 THE VIDEOGRAPHER: Okay. The time is 10:16,
 18 and we are off the record. This concludes the
 19 deposition.
 20 (The deposition concluded at 10:16 a.m.)
 21 (Signature requested.)
 22 --o0o--
 23
 24
 25

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V E R I F I C A T I O N

1
2
3 STATE OF IDAHO)
4 County of Ada)

5
6 I, DIEGO RODRIGUEZ, being first duly
7 sworn on my oath, depose and say:

8 That I am the witness named in the
9 foregoing deposition, taken on October 5, 2022,
10 consisting of pages numbered 1 to 82, inclusive;

11 That I have read the said deposition and
12 know the contents thereof; that the questions
13 contained therein were propounded to me; that the
14 answers to said questions were given by me, and
15 that the answers as contained therein (or as
16 corrected by me therein) are true and correct.

17
18 DEPONENT

19 Signed and sworn before me this of , .

20
21 NOTARY PUBLIC
22 Residing at
23 My commission expires
24
25

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R E P O R T E R ' S C E R T I F I C A T E

1
2
3
4 I, Tiffany Fisher, RPR, CRR, a Notary
5 Public in and for the State of Idaho, do hereby
6 certify:

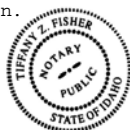
7 That prior to being examined, the
8 witness named in the foregoing deposition was by
9 me duly sworn to testify the truth, the whole
10 truth, and nothing but the truth;

11 That said deposition was taken down by
12 me in shorthand at the time and place therein
13 named and thereafter reduced into typewriting
14 under my direction, and that the foregoing
15 transcript contains a full, true, and verbatim
16 record of the said deposition.

17 I further certify that I have no
18 interest in the event of the action.

19 WITNESS my hand and seal
20 October 24, 2022.

21 Tiffany Fisher, Court Reporter
22 CSR No. 979



23 NOTARY PUBLIC in and for the State of Idaho;
24 residing at Boise, Idaho.

25 My commission expires September 13, 2028.
CSR No. 979

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1 Next would be No. 5?
 2 THE REPORTER: Correct.
 3 MR. STIDHAM: Thank you.
 4 BY MR. STIDHAM:
 5 Q. So let me ask you -- move on to
 6 different topic or different general category of
 7 interrogatories, Mr. Rodriguez.
 8 Can you identify for me, what was the
 9 principal place of business for Freedom Man Press?
 10 A. There is no principal -- go ahead,
 11 finish.
 12 Q. During the period of 2021?
 13 A. There was no principal place of
 14 business other than just me and my laptop.
 15 Wherever I happen to be and wherever I am with my
 16 laptop, that's the place of business.
 17 Q. So there was -- and we can go back to
 18 it, if you want. There was -- a number of times,
 19 there was a State Street address in Boise
 20 identified as the address for Freedom Man Press.
 21 A. Sure.
 22 Q. What is that associated with?
 23 A. That's just a PO box that I have.
 24 Q. Okay. So how long did Freedom Man
 25 Press and/or the FreedomMan.org website use the

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1 State Street, Boise address?
 2 A. I couldn't tell you off the top of my
 3 head.
 4 Q. Can you give me just an estimate of
 5 time?
 6 A. No.
 7 Q. Okay.
 8 A. I can look it up and give you the exact
 9 date if you want to add that to things I need to
 10 get back to you on.
 11 Q. Well, we're going to have some
 12 documents that might help us with timeframe, but
 13 we can follow it up.
 14 A. Okay.
 15 Q. And, again, sir, I'm just asking you
 16 for your estimate or your best understanding. Let
 17 me ask that one more time.
 18 A. Again, off the top of my head, I
 19 wouldn't know what to tell you.
 20 Q. Okay. At any point in time, have you
 21 changed the address for Freedom Man Press or the
 22 FreedomMan.org website from the State Street
 23 address?
 24 A. I don't remember.
 25 Q. Okay. Are you the individual who is

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1 responsible for identifying address and contact
 2 information for the FreedomMan.org website?
 3 A. Yes.
 4 Q. You had indicated previously,
 5 Mr. Rodriguez, that FreedomMan.org is your
 6 personal blog and been used in the past to promote
 7 the positions of Freedom Man PAC.
 8 A. Sure.
 9 Q. Which is a political-based action
 10 committee that you were in charge of that no
 11 longer exists; is that correct?
 12 A. That is correct.
 13 Q. Okay. When did Freedom Man PAC cease
 14 to exist?
 15 A. Once I moved out of Idaho.
 16 Q. Did you formally close the political
 17 action committee?
 18 A. Yes.
 19 Q. So would you identify for me any person
 20 who wrote, authored, edited, or otherwise
 21 contributed any information, any support for
 22 content relating to Natasha Erickson that was
 23 posted on the FreedomMan.org website.
 24 A. Anything posted on there was written by
 25 me.

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1 Q. Well, let me break that down because I
 2 think there's some additional components to that
 3 question, and I want to ask some a little bit more
 4 specifically. But I appreciate your general
 5 answer. Let me focus on this part, contributed to
 6 content related to Natasha Erickson.
 7 Did anyone, other than yourself,
 8 contribute in any way to the content that was
 9 posted relating to Dr. Erickson on the Freedom Man
 10 website?
 11 A. I don't understand how that question is
 12 different from the question you just asked before.
 13 Everything that's on there about Natasha Erickson,
 14 Dr. Natasha Erickson, I wrote. So 100 percent of
 15 it was written by me, penned by my hand, posted by
 16 me, all of it. So that's the same question you
 17 asked previously. I don't understand the
 18 difference now.
 19 Q. Well, I appreciate you asking for the
 20 clarification. So I'm going to go through kind of
 21 how some of these -- how the question was broken
 22 out in the interrogatory, and we can focus on
 23 those pieces. I think, if I understand you
 24 correctly, I understand your answer except for
 25 "contributed," which we'll get to at the end.

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1 as if it was only on that page. It's not only on
2 that page. It's on every single page of that
3 section of the website, which is the baby Cyrus
4 website. So it was on the right side bar of every
5 page, was a donation button.

6 **Q. So let me rephrase.**

7 **Understanding that the donation button**
8 **was placed in various places on the website, my**
9 **question is just -- relates to this one particular**
10 **placement.**

11 A. Okay. Fair enough.

12 **Q. In addition to placement elsewhere, you**
13 **placed the solicitation for donations relating for**
14 **donations in the section where you identify**
15 **Dr. Erickson and others as child traffickers;**
16 **correct?**

17 A. Correct.

18 **Q. Okay. And then let's just use this**
19 **exhibit to maybe give us a timeframe and clarify**
20 **an earlier question. If we look at the -- what is**
21 **the bottom of this exhibit, Mr. Rodriguez, you'll**
22 **see an address here, 9169 West State Street,**
23 **Suite 3177.**

24 **Do you see that?**

25 A. Um-hmm. Yes.

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1 A. No. This one right here,
2 9169 West State Street, Boise, Idaho, 83714,
3 that's a virtual address slash -- I used the term
4 PO box, but that's a virtual address.

5 **Q. The one for State Street is virtual,**
6 **also?**

7 A. Correct.

8 **Q. Okay. Did you have any physical**
9 **facilities for FreedomMan.org or**
10 **Freedom Man Press?**

11 A. Just my home, 1876 East Adelaide, where
12 I lived for years in Idaho.

13 **Q. Okay. Mr. Rodriguez, let's go off the**
14 **record for just about five minutes. And maybe I**
15 **can -- your answers -- based on your answers, I**
16 **think I can get some of my documents arranged here**
17 **in five minutes and make it more efficient for us**
18 **to complete this.**

19 A. Okay.

20 **Q. You can go ahead -- and right now, if**
21 **we agree to go off the record, it's 9:52. If it**
22 **works for you, Mr. Rodriguez, we can get back at**
23 **10:00 a.m. Mountain. You can just put it on mute**
24 **and shut your screen down, and we'll get back on**
25 **here in about ten minutes.**

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1 **Q. So we talked earlier in your deposition**
2 **about the principal place of business identified**
3 **for Freedom Man Press and the website.**

4 **Is it fair to say that you identified**
5 **as the address for FreedomMan.org at or around the**
6 **time that you were making postings identifying**
7 **Dr. Erickson and others at child traffickers, you**
8 **identified the principal place of business as**
9 **9169 West State Street?**

10 A. Yeah, that's fair to say.

11 **Q. Okay. Does this reference here to the**
12 **State Street address help you with your memory as**
13 **to when you changed the identification of the**
14 **address or principal place of business for**
15 **Freedom Man Press or FreedomMan.org?**

16 A. No, because, again, I don't know what
17 date it was that I acquired that PO box.

18 **Q. In Florida --**

19 A. Like I told you, I can get you that
20 information because all I have to do is go back
21 and look up when I signed the contract for it.

22 **Q. Okay. So, just so I'm clear, when you**
23 **say you don't know when you acquired that PO box,**
24 **you're referring to the virtual address in**
25 **Florida?**

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1 **Does that work?**

2 A. Okay.

3 THE VIDEOGRAPHER: It is 9:52, and we are
4 off the record.

5 (Break taken from 9:52 a.m. to
6 10:01 a.m.)

7 THE VIDEOGRAPHER: All right. It is 10:01,
8 and we are back on the record.

9 BY MR. STIDHAM:

10 **Q. Okay. And I'm going to go through some**
11 **aspects of what was Interrogatory No. 4,**
12 **Mr. Rodriguez. I think we covered a bit of it,**
13 **but I'll go through it again.**

14 A. Okay. Really quick, on the break -- if
15 you don't mind me adding this, and you can take it
16 for the record or strike it. Earlier you asked
17 the question about there being advertising on the
18 Freedom Man website. I said, no, there's not any,
19 and there's not.

20 However, when we were on the break,
21 because you made a face like "I've seen an ad on
22 there before." So I went to go look in my browser
23 that doesn't have all advertising blocked on it.
24 And sure enough, on the bottom of the blog pages,
25 there are ads on there. So I'm assuming that's