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Counsel for Plaintiffs

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

ST. LUKE'S HEALTH SYSTEM, LTD; ST. LUKE'S REGIONAL MEDICAL CENTER, LTD; CHRIS ROTH, an individual; NATASHA D. ERICKSON, MD, an individual; and TRACY W. JUNGMAN, NP, an individual,

Plaintiffs,

vs.

AMMON BUNDY, an individual; AMMON BUNDY FOR GOVERNOR, a political organization; DIEGO RODRIGUEZ, an individual; FREEDOM MAN PRESS LLC, a limited liability company; FREEDOM MAN PAC, a registered political action committee; and PEOPLE'S RIGHTS NETWORK, a political organization,

Defendants.

Case No. CV01-22-06789

**DECLARATION OF ERIK F. STIDHAM
IN SUPPORT OF PLAINTIFFS'
MOTION TO COMPEL**

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.

2. Attached hereto as **Exhibit A** is a true and correct copy of Defendant Diego Rodriguez's Responses to Plaintiff St. Luke's Health System, Ltd.'s Second Interrogatories and First Requests for Production to Defendant Diego Rodriguez, served November 7, 2022.

3. Attached hereto as **Exhibit B** is a true and correct copy of an email string between me and Rodriguez regarding discovery disputes.

4. Attached hereto as **Exhibit C** is a true and correct copy of a formal deficiency letter I sent to Rodriguez on November 30, 2022.

5. As of the date of this filing, Rodriguez has not responded to my November 30, 2022 discovery letter.

6. I attempted to confer with Rodriguez, in good faith, to resolve our discovery disputes prior to bringing this Motion.

7. We have gathered multiple examples of Rodriguez's communications, interviews, conversations, and other discussions on public and non-public forums related to the issues in this lawsuit and the lawsuit itself. Rodriguez failed to identify any of those communications in response to Interrogatory No. 14.

8. Attached hereto as **Exhibit D** are true and correct excerpts from the deposition of Diego Rodriguez, taken October 5, 2022.

9. Attached hereto as **Exhibit E** is a true and correct copy of an April 29, 2022 article posted by Rodriguez on freedomman.org entitled "Insider Information from a Whistleblower!".

10. Plaintiffs submitted a public records request to the Meridian Police Department for documents and video related to the incidents on March 11, 2022. That request was denied.

11. Attached hereto as **Exhibit F** is a true and correct copy of a letter dated October 28, 2022 that I sent to Rodriguez regarding the additional information he agreed to provide during his deposition.

12. As of the date of this filing, Rodriguez has not responded to my October 28, 2022 letter and has not provided the additional information that he agreed to provide.

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

DATED this 6th day of December, 2022.

/s/ Erik F. Stidham

Erik F. Stidham

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of December, 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

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

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

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

/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

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EXHIBIT A

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) **CASE NO. CV01-22-06789**
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.)

TO: PLAINTIFFS AND THEIR COUNSEL OF RECORD

COMES NOW Diego Rodriguez, Defendant in the above-entitled action, and, in accordance with the requirements of Rules 33, 34, and 36 of the Idaho Rules of Civil Procedure, hereby serves his response to Plaintiffs' Second Set of Interrogatories and Request for

DEFENDANT'S RESPONSES TO PLAINTIFFS SECOND SET OF INTERROGATORIES TO DEFENDANT DIEGO RODRIGUEZ – 1

Production of Documents and Request for Admissions.

GENERAL OBJECTIONS

1. Defendant objects to the Requests to the extent they purport to impose burdens, obligations or requirements in excess of those permitted by the Idaho Rules of Civil Procedure or any other statute, rule or order applicable to this proceeding.

2. Defendant objects to the Requests to the extent they are vague, ambiguous, not susceptible to a reasonable interpretation, overly broad, or impose an undue burden on Defendant.

3. Defendant objects to the Requests to the extent they seek information or documents protected by any applicable privilege, immunity or privacy right, including but not limited to the attorney-client privilege, work product doctrine, common interest privilege, or any other applicable privilege, immunity or privacy right, or which are developed in anticipation of or in preparation for litigation. Nothing contained in these Responses is intended to be, nor should be construed as, a waiver of any such privilege. To the extent that any privileged or protected information or material is inadvertently provided in these Responses, such disclosure shall not constitute a waiver of the privilege or protection afforded such information, and Plaintiffs shall immediately return or destroy, without further inspection, any such information upon request.

4. Defendant objects to the “relevant time” period as defined and scope of the Requests as defined.

5. The General Objections asserted above shall be deemed applicable to and continuing with respect to any Request responded to below. The General Objections asserted above are incorporated into the Responses set forth herein. Such objections are not waived, nor are they in any way limited, by any Response to any Request.

6. I reserve the right to supplement any of these responses.

INTERROGATORIES

INTERROGATORY NO. 6: Please state the names, addresses, and telephone numbers of every Person You believe to have Knowledge about the subject matter of this lawsuit and state Your understanding of the Knowledge possessed by each Person.

ANSWER TO INTERROGATORY NO. 6:

Diego Rodriguez

Levi Anderson

Marissa Anderson

Miranda Chavoya

Detective Jeff Fuller (address and telephone number unknown to me right now)

Detective Steve Hansen (address and telephone number unknown to me right now)

Dr. Natasha Erickson (address and telephone number unknown to me right now)

Tracy Jungman (address and telephone number unknown to me right now)

St. Luke's CEO, Chris Roth (address and telephone number unknown to me right now)

INTERROGATORY NO. 7: Please Identify the Person(s) or entity responding to these discovery requests, including the Person(s) who provided any information consulted, relied upon, or used in responding to these discovery requests.

ANSWER TO INTERROGATORY NO. 7: I, Diego Rodriguez, alone am responding to these discovery requests.

INTERROGATORY NO. 8: Please identify each Person You have interviewed or have had any discussion with relating to the subject matter of this litigation or any allegation herein and Describe the substance of each such interview or discussion, the date of each such interview or discussion, and Identify each Person in the interview or discussion.

ANSWER TO INTERROGATORY NO. 8: I have yet to interview anybody. I reserve the right to supplement this response.

INTERROGATORY NO. 9: Please identify all witnesses You may call to testify at the

trial of this lawsuit and state the facts and opinions to which You expect each witness to testify.

ANSWER TO INTERROGATORY NO. 9: I don't know who I will call to testify yet.

But don't worry, that list will be coming.

INTERROGATORY NO. 10: If You intend to call any Person as an expert witness at the trial of this lawsuit, please supply the following information:

- (a) The name and address of each expert witness;
- (b) The subject matter on which each expert witness is expected to testify;
- (c) The qualifications of the Person to testify as an expert on the subject of his or her testimony;
- (d) The dates any written reports were prepared concerning the subject matter of this action; and
- (e) All matters required to be identified under Idaho Rule of Civil Procedure 26(b)(4)(A).

ANSWER TO INTERROGATORY NO. 10: I will notify you as soon as I have people who I know will be called upon to testify.

INTERROGATORY NO. 11: If You contend Plaintiffs or any representative of Plaintiffs have made any admission against interest, please Identify all such admissions by date and summarize the alleged statements made.

ANSWER TO INTERROGATORY NO. 11: I admit that I have no idea what this even means.

INTERROGATORY NO. 12: Please Identify whether You have liability insurance coverage for any of the claims made against You or any personal or business umbrella policy that You have had at any time since January 1, 2022. If You have or had such coverage or policy, Identify the name and address of the insurance carrier and the policy limits of coverage. In lieu

of answering this Interrogatory, attach a copy of a declarations sheet for any insurance policy that provides You coverage relevant to the facts alleged in the Complaint.

ANSWER TO INTERROGATORY NO. 12: I have no insurance coverage for any of the claims made against me.

INTERROGATORY NO. 13: Please Identify all communications, conversations, discussions, or correspondence between You and any other Defendant that occurred between March 1, 2022, to the present, and which relate to any issue in this lawsuit including, but not limited to, communications between You and Defendant Ammon Bundy relating to Defendant Ammon Bundy's presence at St. Luke's Meridian on March 12, 2022, communications between You and Defendant Ammon Bundy regarding the Plaintiffs, and communications between You and Defendant Ammon Bundy relating to DHW's intervention involving the Infant.

ANSWER TO INTERROGATORY NO. 13: While it is true that Ammon and I have had multiple conversations in regards to the Baby Cyrus case, this lawsuit, the fake pandemic, the tyranny of St. Luke's and the corruption of Idaho State government, there is no way to identify when or where we had those conversations.

INTERROGATORY NO. 14: Please Identify all communications, conversations, discussions, or correspondence that You have had on any public or non-public forum, including, but not limited to forums on Telegram, MeWe, Rumble, or Gab, with any Person that occurred between March 1, 2022, to the present, and which relate to any issue in this lawsuit, including but not limited to all conversations with any Person via any platform provided by or designated for use by Defendant People's Rights Network. In answering this Interrogatory, please Identify the date the conversation occurred, the forum on which the conversation occurred, the parties to the conversation, and the topic of discussion.

ANSWER TO INTERROGATORY NO. 14: I have posted an article regarding this lawsuit on the website, FreedomMan.org, which can be seen here:

<https://www.freedomman.org/2022/st-lukes-is-suing-us-for-exposing-them/>

INTERROGATORY NO. 15: Please Identify all forms, methods, apps, or types of communication You have used to communicate with any other Person about any issue involved in this lawsuit, including all forms of communications that were used to communicate with members of People's Rights Network.

ANSWER TO INTERROGATORY NO. 15: The People's Rights Network is not an organization in the way in which you describe it. It is simply a network of individuals who communicate with one another regarding issues of freedom and liberty. To that end, the People's Rights Network has a simple text and email messaging system that can be accessed and used by certain individuals in various geographical regions around the state. I personally did not use the People's Rights network messaging system in neither the Baby Cyrus case nor this lawsuit against me. However, I am aware that other members of the People's Rights Network did send out messages regarding the Baby Cyrus case, but I am not aware of anything having been sent out regarding this lawsuit.

INTERROGATORY NO. 16: Please Identify all phone numbers, email addresses, profiles, alias, pseudonyms, or other accounts You have used to communicate or correspond with others about any issue in this lawsuit from March 1, 2022, to the present.

ANSWER TO INTERROGATORY NO. 16: There are none. Everything I have done in connection with this lawsuit has been published in public forums by me, Diego Rodriguez, using my true and legal name, Diego Rodriguez, and has all been published on the website, FreedomMan.org.

INTERROGATORY NO. 17: Please identify all devices, including but not limited to phones and computers, used to communicate or correspond with others about any issue in this lawsuit from March 1, 2022, to the present.

ANSWER TO INTERROGATORY NO. 17: My personal cell phone and personal laptop computer are the only devices which would have been used for any communication regarding this lawsuit.

INTERROGATORY NO. 18: Please identify all methods, including but not limited to websites, servers, or apps, used to communicate or correspond with others to invite or encourage people to show up, participate, attend, or gather at any time or in any way related to the events in this lawsuit from March 1, 2022, to the present, including for protests, rallies, or legal proceedings.

ANSWER TO INTERROGATORY NO. 19: The only methods used were the FreedomMan.org website, my own email list, and my own personal contact list used to send text messages to people I know personally.

INTERROGATORY NO. 19: Please Identify every public appearance You have made from March 1, 2022, to the present, and which relate to any issue in this lawsuit, including every documentary, interview, podcast, press conference, rally, or other media appearance You have made.

ANSWER TO INTERROGATORY NO. 19: All of the public appearances can be found here: <https://www.freedomman.org/cyrus/interviews-and-media/>

INTERROGATORY NO. 20: Please Identify any evidence, records, communications, correspondence, or other documents that support any of the statements or accusations identified in ¶ 114 of the Amended Complaint.

ANSWER TO INTERROGATORY NO. 20: The evidence that supports the statements and accusations made in Section 114 are:

1. The published federal law known as the Adoptive Safe Families Act.
2. Idaho's State Statues regarding Child Protective Services and the Child Protection Act.
3. Idaho Department of Health and Welfare's published budget records.
4. Various comments and statements made by patients of St. Luke's both in online comments and in person.
5. Statistical data published by IDHW regarding "child protective services."
6. Personal conversation with people who had their child killed by St. Luke's.
7. News articles demonstrating St. Luke's malpractice and incompetence resulting in the deaths of babies (i.e. <https://www.ktvb.com/article/news/local/st-lukes-explains-babys-death/416460574>)
8. Personal conversations with Levi and Marissa Anderson, baby Cyrus's parents.

INTERROGATORY NO. 21: Please Identify any evidence, records, communications, correspondence, or other documents that support the contention that Plaintiffs committed a crime."

ANSWER TO INTERROGATORY NO. 21: The plaintiffs knowingly took Baby Cyrus and kept him in their custody when they knew and were 100% aware of the fact that Baby Cyrus was not in "imminent danger. This has been published in their own medical records for Baby Cyrus and can be seen here: <https://www.freedomman.org/cyrus/story/>

INTERROGATORY NO. 22: Please Identify any evidence, records, communications, correspondence, or other documents that support the contention that Plaintiffs are incompetent at

their trade or profession.

ANSWER TO INTERROGATORY NO. 22: Here is an article that shows that St. Luke's hospital killed a baby due to incompetence: <https://www.ktvb.com/article/news/local/st-lukes-explains-babys-death/416460574>. Here is a personal testimony from an Idaho father who had his child killed by St. Luke's hospital: <https://www.freedomman.org/cyrus/press-conferences/> (March 14th press conference). Don't worry, more is coming. Much more!

INTERROGATORY NO. 23: Please Identify all corporations, non-profit organizations, limited liability companies, partnerships, associations, or other business entities or organizations You own or control.

ANSWER TO INTERROGATORY NO. 23: I have ownership and control of Power Marketing Consultants, LLC, registered in Idaho.

INTERROGATORY NO. 24: Please Identify all websites that were owned, controlled, operated, or created by You between January 1, 2022, to the present.

ANSWER TO INTERROGATORY NO. 24: I have control over the following websites:

Freedomman.org

DiegoRodriguez.org

INTERROGATORY NO. 25: Please Identify all websites that You used to post or communicate information regarding the events discussed in the Complaint and provide each username You used for each website.

ANSWER TO INTERROGATORY NO. 25: The only website used to communicate information regarding the Baby Cyrus case is: FreedomMan.org.

INTERROGATORY NO. 26: Please Identify all applications, including, but not limited

to messaging applications or social media platforms like Telegram, MeWe, Rumble, and Gab, that You used to post or communicate information regarding the events discussed in the Complaint and provide each username You used for each website.

ANSWER TO INTERROGATORY NO. 26: The only messaging application used to post information regarding the Baby Cyrus case is Telegram. My username on Telegram is @Diego Rodriguez.

INTERROGATORY NO. 27: Please Identify all aliases, nicknames, or pseudonyms You have used from January 1, 2022, to the present. In answering this Interrogatory, Identify the website(s) that such aliases were used on, if any.

ANSWER TO INTERROGATORY NO. 27: I publish articles on the FreedomMan.org website under the alias/pseudonym “Gunner Steele.” However, all posts regarding the Baby Cyrus case have all been published using my real legal name, Diego Rodriguez.

INTERROGATORY NO. 28: Please Identify the total amount of money or other things of value donated to, raised by, received by, or collected by You or Your Immediate Family, including any business entity owned or controlled by You or Your Immediate Family, between March 1, 2022, to the present. In answering this Interrogatory, separately Identify the amount of money or item of value donated to You and/or the amount of money donated to each Immediate Family member, state how that money was collected, and state how that money is being spent or will be spent.

ANSWER TO INTERROGATORY NO. 28: I have not received a single solitary cent from any money raised by the Baby Cyrus case. Period.

INTERROGATORY NO. 29: Please Identify any records, communications,

correspondence, or other documents that indicate the amount of money charged to the Infant's family relating to the Infant's medical expenses between March 1, 2022, to the present.

ANSWER TO INTERROGATORY NO. 29: That is none of my business. That information is private information for Baby Cyrus's parents.

INTERROGATORY NO. 30: Please Identify any records, communications, correspondence, or other documents that indicate the amount of liability incurred by the Infant's family relating to the Infant's medical expenses between March 1, 2022, to the present.

ANSWER TO INTERROGATORY NO. 30: This again, is none of my business. Baby Cyrus is my grandson, not my son, and I do not have any legal guardianship, control, or responsibility for him.

INTERROGATORY NO. 31: Please Identify any records, communications, correspondence, or other documents that indicate the amount of public assistance, insurance coverage, or charitable donations provided to the Infant's family relating to the Infant's medical expenses between March 1, 2022, to the present.

ANSWER TO INTERROGATORY NO. 31: As previously stated, this is none of my business.

INTERROGATORY NO. 32: Please Identify any records, communications, correspondence, or other documents that indicate the amount of public assistance, insurance coverage, or charitable donations provided to the Infant's family relating to the Infant's medical expenses between March 1, 2022, to the present.

ANSWER TO INTERROGATORY NO. 32: This is a repeat of interrogatory 31.

INTERROGATORY NO. 33: Please Identify all documents that You intend to rely on in the defense of this lawsuit.

ANSWER TO INTERROGATORY NO. 33: I will rely on the following documents in defense of the lawsuit:

1. St. Luke's medical records showing the fact that they knew and were aware that Baby Cyrus was not in "imminent danger."
2. Bodycam footage from the Meridian Police department showing that both the police, doctors, and IDHW knew that Baby Cyrus was not in imminent danger.
3. The clearly defined and stated Idaho State Statutes in regards to Child Protection that show that the Meridian Police Department broke the law when taking Baby Cyrus.
4. The publicly available data showing how much money the state of Idaho receives for kidnapping children on an annual basis.
5. Testimonies and affidavits from other families who have been abused by both IDHW and St. Luke's.
6. Publicly available data showing how much money St. Luke's has received over the years for receiving children who have been forcibly kidnapped by Idaho police agencies, and how much money Dr. Natasha Erickson, Chris Roth, and Tracy Jungman have personally earned as a result of it.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1: Please produce all documents and/or other physical or tangible objects identified, described, discussed, referred to, relied upon, consulted, or used in any way in answering the Interrogatories served herewith. With respect to each such document or object, please indicate the number of the Interrogatory or Interrogatories to which the document or object is responsive.

RESPONSE TO REQUEST FOR PRODUCTION NO. 1: There are none other than

the contents of the publicly accessible website, FreedomMan.org.

REQUEST FOR PRODUCTION NO. 2: Please produce each exhibit which You intend to offer into evidence at the trial of this lawsuit.

RESPONSE TO REQUEST FOR PRODUCTION NO. 2: I have not decided what documents I will use as exhibits at trial but I may use the information found here:

<https://www.freedomman.org/cyrus/story/>

REQUEST FOR PRODUCTION NO. 3: Please produce all documents, communications, and/or electronic data related to any exhibits You anticipate using at the trial of this lawsuit.

RESPONSE TO REQUEST FOR PRODUCTION NO. 3: I have not decided what documents I will use as exhibits at trial but I may use the information found here:

<https://www.freedomman.org/cyrus/story/>

REQUEST FOR PRODUCTION NO. 4: Please produce all documents, including, but not limited to emails, text messages, communications, or other ESI, which relate to the subject matter of this lawsuit.

RESPONSE TO REQUEST FOR PRODUCTION NO. 4: I don't know what ESI is, but the documents that I am currently aware that will be used are the medical records provided by St. Luke's which you can find at the link above.

REQUEST FOR PRODUCTION NO. 5: Please produce all correspondence and communications relating to Plaintiffs, this lawsuit, or any facts relating to the allegations contained in this lawsuit, including but not limited to all correspondence or communications sent to or received from members or followers of People's Rights Network or freedomman.org.

RESPONSE TO REQUEST FOR PRODUCTION NO. 5: There is nothing related to

this lawsuit. Everything that concerns this lawsuit has already been published and remains LIVE and visible at FreedomMan.org/cyrus.

REQUEST FOR PRODUCTION NO. 6: Please produce all documents which support, negate, or contradict any of the allegations of the Complaint.

RESPONSE TO REQUEST FOR PRODUCTION NO. 6: These have already been provided in the links above.

REQUEST FOR PRODUCTION NO. 7: Please produce all documents, communications, and/or electronic data sufficient to identify the Knowledge You believe is held by any individuals identified by name in response to any Interrogatory.

RESPONSE TO REQUEST FOR PRODUCTION NO. 7: I am unaware of any responsive documents to this request.

REQUEST FOR PRODUCTION NO. 8: Please produce all documents provided by You to any expert retained by You to form any opinions related to the allegations in the Complaint.

RESPONSE TO REQUEST FOR PRODUCTION NO. 8: As stated previously, I currently have not retained any expert witnesses. I reserve the right to supplement this response.

REQUEST FOR PRODUCTION NO. 9: Please produce all documents considered or relied upon by any expert retained by You to form any opinions related to the allegations in the Complaint.

RESPONSE TO REQUEST FOR PRODUCTION NO. 9: As stated previously, I currently have not retained any expert witnesses. I reserve the right to supplement this response.

REQUEST FOR PRODUCTION NO. 10: Please produce all documents, communications, and/or electronic data related to any lay witnesses You may call at the trial of

this lawsuit.

RESPONSE TO REQUEST FOR PRODUCTION NO. 10: I currently have not retained any specific lay witnesses. I reserve the right to supplement this response.

REQUEST FOR PRODUCTION NO. 11: Please produce all insurance policies in Your possession that relate to or potentially provide coverage for the allegations in the Complaint.

RESPONSE TO REQUEST FOR PRODUCTION NO. 11: There are none.

REQUEST FOR PRODUCTION NO. 12: Please produce copies of all documents, including memoranda, notes, blog posts, or interviews, in which You have memorialized any conversations or events that relate to any of the matters in this lawsuit.

RESPONSE TO REQUEST FOR PRODUCTION NO. 12: The videos that I am aware of can be found here: <https://www.freedomman.org/cyrus/interviews-and-media/>

REQUEST FOR PRODUCTION NO. 13: Please produce all documents, specifically including text messages, emails, alerts, recorded interviews, communications using the Telegram app or platform, the Gab platform, or any other communications using any apps or platforms, between You and any third party concerning the subject matter of or allegations contained in this lawsuit.

RESPONSE TO REQUEST FOR PRODUCTION NO. 13: All of these emails referenced have been compiled into a ZIP file which you can access here: <https://www.freedomman.org/pdf/cyrus-emails.zip>.

REQUEST FOR PRODUCTION NO. 14: Please produce all correspondence or communications, including but not limited to emails, voicemails, and text messages, you sent or received related to any public appearance or livestreaming event you participated in or interview

you gave where you discussed or talked about the events related to this lawsuit.

RESPONSE TO REQUEST FOR PRODUCTION NO. 14: These are all available here: <https://www.freedomman.org/cyrus/interviews-and-media/>.

REQUEST FOR PRODUCTION NO. 15: Please produce all copies of any document produced or provided to You by any third party related to this litigation, including in response to any subpoena issued in this case.

RESPONSE TO REQUEST FOR PRODUCTION NO. 15: There are none I am aware of.

REQUEST FOR PRODUCTION NO. 16: Please produce all documents, specifically including text messages, emails, or other communications, exchanged between You and any Defendant in this lawsuit, including all present and former agents and employees of any Defendant, that relate to the matters set forth in the Complaint or Answer.

RESPONSE TO REQUEST FOR PRODUCTION NO. 16: There are none I am aware of.

REQUEST FOR PRODUCTION NO. 17: Please produce all statements of fictitious business names, names used for business under an assumed name or DBA designation, and organizational or founding documents for any association or legal or non-legal entity that You own, control, founded, and/or operate, now or in the past.

RESPONSE TO REQUEST FOR PRODUCTION NO. 17: The PDF copy can be found here: <https://www.freedomman.org/pdf/PMC-Assumed-Business-Name.pdf>.

REQUEST FOR PRODUCTION NO. 18: Please produce legible copies of all written, oral, or recorded statements taken from any Person in connection with matters related to the claims and defenses in this lawsuit.

RESPONSE TO REQUEST FOR PRODUCTION NO. 18: There are none.

REQUEST FOR PRODUCTION NO. 19: Please produce, for the time period from January 1, 2022, to the present, all of the following that You had in effect: articles of incorporation or other founding documents (including any amendments thereto); certificates of organization; operating agreements (including amendments thereto); by-laws; shareholder agreements; and statements or certificates of limited partnership (including any amendments thereto).

RESPONSE TO REQUEST FOR PRODUCTION NO. 19: I have already provided this information for Power Marketing Consultants, LLC above.

REQUEST FOR PRODUCTION NO. 20: Please produce, for the time period from January 1, 2022, to the present, all corporate organizational chart(s) relating to any entity owned, operated, or controlled by You.

RESPONSE TO REQUEST FOR PRODUCTION NO. 20: There is no organizational chart, there is simply me.

REQUEST FOR PRODUCTION NO. 21: Please produce all documents demonstrating the relationship between You, Freedom Man Press, LLC, Freedom Man PAC, freedomman.org, Power Marketing, and any other business or entity through which you generate income, express ideas, or interact with the public.

RESPONSE TO REQUEST FOR PRODUCTION NO. 21: There is no Freedom Man Press, LLC. Freedom Man Press is simply the name I use for my blog/website which is at FreedomMan.org. The Freedom Man PAC was in existence from about 2014 through 2022, but has been dissolved as of 2022 (once we moved out of state). However, neither FreedomMan.org nor Freedom Man PAC has received a single cent of revenue from outside sources. They do not

generate income, on the contrary they cost me personal money in order to publish and maintain.

REQUEST FOR PRODUCTION NO. 22: Please produce all documents demonstrating any contracts or business relationship between You or any entity owned or controlled by You and Ammon Bundy or any entity or association owned or controlled by Ammon Bundy, including but not limited to the People Rights Network and Abish-Husbondi, Inc.

RESPONSE TO REQUEST FOR PRODUCTION NO. 22: There are none.

REQUEST FOR PRODUCTION NO. 23: Please produce copies of your state and federal income tax returns for the years 2021 and 2022.

RESPONSE TO REQUEST FOR PRODUCTION NO. 23: I object. That is private information not relevant to this case.

REQUEST FOR PRODUCTION NO. 24: Please produce a privilege log identifying any documents withheld from production under claim of privilege or the work-product doctrine.

RESPONSE TO REQUEST FOR PRODUCTION NO. 24: I don't know what this means. But there is nothing relevant to this case that has not already been provided or published publicly.

REQUEST FOR PRODUCTION NO. 25: Please produce all emails that were sent between March 1, 2022, to the present that are responsive to the following search terms: "Baby Cyrus" or "Cyrus" or "St. Luke's" or "Erickson" or "Roth" or "Jungman" or "kidnapping" or "crime" or "trafficking" including any misspellings of the same.

RESPONSE TO REQUEST FOR PRODUCTION NO. 25: All emails regarding the Baby Cyrus case have already been provided in RFP #13 above.

REQUEST FOR PRODUCTION NO. 26: Please produce all documents or communications You received or sent asking others to call, text, email, protest, or otherwise

disrupt or interfere with St. Luke's operations.

RESPONSE TO REQUEST FOR PRODUCTION NO. 36: These have already been provided in RFP #13 above.

REQUEST FOR PRODUCTION NO. 27: Please produce all documents or communications You or any of Your agents received or sent asking others to call, text, email, protest, pressure, or influence any Plaintiff in this lawsuit.

RESPONSE TO REQUEST FOR PRODUCTION NO. 27: These have already been provided in RFP #13 above.

REQUEST FOR PRODUCTION NO. 28: Please produce all documents or communications that support any of the statements or accusations identified in ¶ 114 of the Amended Complaint.

RESPONSE TO REQUEST FOR PRODUCTION NO. 28: Those that I am currently aware of have already been identified with links provided in interrogatory #22 above.

REQUEST FOR PRODUCTION NO. 29: Please produce all video or audio recordings relating to any encounter You had with police or DHW on March 11, 2022, including any recordings taken when police visited Your house.

RESPONSE TO REQUEST FOR PRODUCTION NO. 29: You can access these videos on the following link:

<https://www.dropbox.com/sh/yladfqhiz26fodd/AAAMI2s3mxW0ZgP-62-Y2jBNa?dl=0>.

REQUEST FOR PRODUCTION NO.30: Please produce all organizational documents relating to the People Against Child Trafficking organization (P.A.C.T.) See.

<https://freedomman.org/cyrus/pact-rally/>.

RESPONSE TO REQUEST FOR PRODUCTION NO. 30: There is no formal

organization. It does not exist.

REQUEST FOR PRODUCTION NO. 31: Please produce all videos, PowerPoint slides, spreadsheets, word documents, or other documents that You displayed or projected during any press conference, meeting, or rally You held or attended between March 11, 2022, to the present that relates in any way to the events of this lawsuit, including documents displayed during the March 26, 2022, P.A.C.T. Rally described in the Complaint.

RESPONSE TO REQUEST FOR PRODUCTION NO. 31: The Keynote presentation can be downloaded here: <https://www.freedomman.org/pdf/PACT-RALLY.pdf>.

REQUEST FOR PRODUCTION NO. 32: Please produce all documents or communications you sent to or received from P.A.C.T. related to the events of this lawsuit, including all marketing materials or solicitations sent to or received from P.A.C.T.

RESPONSE TO REQUEST FOR PRODUCTION NO. 32: There is no such thing as P.A.C.T. It is just the name we used for a rally we held to bring awareness to child trafficking.

REQUEST FOR PRODUCTION NO. 33: To the extent not produced in response to the foregoing requests, please produce all emails, text messages, alerts, or other communications that You sent to any Person between March 11, 2022, to the present, that relate in any way to the issues described in the Complaint, including, but not limited to, communications sent to members of Defendant People's Rights Network on March 11, 2022, and communications sent in connection with the press conferences that took place between March 11, 2022, and March 18, 2022.

RESPONSE TO REQUEST FOR PRODUCTION NO. 33: There are none I am aware of.

REQUEST FOR PRODUCTION NO. 34: To the extent not produced in response to

the foregoing requests, please produce all emails, text messages, alerts, posts, recordings, videos, or other communications or documents that You sent to Persons or posted online between March 11, 2022, to the present, that requested donations or support relating in any way to the events described in the Complaint.

RESPONSE TO REQUEST FOR PRODUCTION NO. 34: There are none I am aware of.

REQUEST FOR PRODUCTION NO. 35: Please produce all documents showing money or funds or things of financial value donated or obtained through the Baby Cyrus pages on freedomman.org, including the name of the donor, amount of donation, date of donation, and any messages received with the donation.

RESPONSE TO REQUEST FOR PRODUCTION NO. 35: This is private information not connected to me. The link from FreedomMan.org sent people to a GiveSendGo.com campaign which was hosted and controlled by GiveSendGo and was created by a 3rd party, Rick Green.

REQUEST FOR PRODUCTION NO. 36: Please produce all documents showing the disposition, transfer, or use of money or funds donated or obtained through the Baby Cyrus pages on freedomman.org, including the name of the person or entity receiving the funds, the date the person or entity received the funds, and the amount of the funds.

RESPONSE TO REQUEST FOR PRODUCTION NO. 36: There are and were no donations received on the FreedomMan.org website. There was only a link from the FreedomMan.org website to the GiveSendGo.com donation page set up for Baby Cyrus and his family.

REQUEST FOR PRODUCTION NO. 37: Please produce all documents and records,

including communications, related to or showing the receipt, payment, loan, and/or transfer of money or funds by and between You, Defendant Ammon Bundy, Defendant Ammon Bundy for Governor, Defendant Freedom Man PAC, Defendant Freedom Man Press LLC, GiveSendGo, People's Rights Network, Abish-husbondi Inc., Dono Custos, Inc., Freedom Tabernacle, Incorporated, Power Marketing Consultants LLC, Power Marketing Agency, LLC and/or the Immediate Families of any of the foregoing between March 1, 2022, to the present.

RESPONSE TO REQUEST FOR PRODUCTION NO. 37: Ammon Bundy is buying my RV from me and has been making payments to me for the purchase of the RV. There are no records of any agreements because it is a simple man-to-man agreement we've made with one another.

REQUEST FOR PRODUCTION NO. 38: To the extent not produced in response to the foregoing requests, please produce all documents or communications between You and any member of any organized or unorganized advocacy group between March 1, 2022, to the present concerning the subject matter of or allegations contained in this lawsuit.

RESPONSE TO REQUEST FOR PRODUCTION NO. 38: There are none I am aware of.

REQUEST FOR PRODUCTION NO. 39: To the extent not produced in response to the foregoing requests, please produce all documents or communications between You and any "Patriot" as that term is used in Defendant Ammon Bundy's September 7, 2022, Facebook live video (<https://www.facebook.com/realammonbundy/videos/423278493120502/>) (at minute 23 to 24) that occurred between March 11, 2022, to the present concerning the subject matter of this lawsuit.

RESPONSE TO REQUEST FOR PRODUCTION NO. 39: There are none that I am

aware of.

REQUEST FOR PRODUCTION NO. 40: Please produce all documents or communications reflecting your membership with or participation in any organization, network, or entity mentioned in the Complaint, including all documents or communications showing your membership with or participation in Defendant People’s Rights Network.

RESPONSE TO REQUEST FOR PRODUCTION NO. 40: There is no membership” in the People’s Rights Network. If you want to “join” you simply text your “Rights” to 80123 and you get added to the list. It is just like subscribing to an email list. To that end, I am on the list and have been since its inception.

REQUEST FOR PRODUCTION NO. 41: Please produce all documents and communications received from any “whistleblowers” as discussed in your April 29, 2022 article on freedomman.org entitled “Insider Information from a Whistleblower!”

RESPONSE TO REQUEST FOR PRODUCTION NO. 41: The communications received from whistleblowers were deleted for privacy purposes at the end of April 2022. As a member of the Press, it is my duty to protect my sources.

REQUEST FOR PRODUCTION NO. 42: Please produce all documents demonstrating or showing the changes or updates to the freedomman.org website from March 1, 2022 through the present.

RESPONSE TO REQUEST FOR PRODUCTION NO. 42: There are no change logs which show or demonstrate changes or updates to the FreedomMan.org website as it is built on the Rapidweaver platform and such logs do not exist. However, updates and changes can easily be seen by simply using the publicly available WayBack machine, where changes and updates can easily be seen here: https://web.archive.org/web/20220101000000*/freedomman.org

REQUEST FOR PRODUCTION NO. 43: Please produce all documents, including but not limited to emails, text messages, or other forms of communication between You and any other Defendant that occurred between March 1, 2022, to the present, and which relate to any issue in this lawsuit including, but not limited to, communications between You and Defendant Ammon Bundy relating to Defendant Ammon Bundy's presence at St. Luke's Meridian on March 12, 2022, communications between You and Defendant Ammon Bundy regarding the Plaintiffs, and communications between You and Defendant Ammon Bundy relating to DHW's intervention involving the Infant.

RESPONSE TO REQUEST FOR PRODUCTION NO. 43: There are none that I am aware of.

REQUEST FOR PRODUCTION NO. 44: Please produce copies of any and all registered copyrights that You or any entity under Your control have including, but not limited to, any registered copyright associated with the freedomman.org website or any registered copyright associated with the contact@freedomman.org email account.

RESPONSE TO REQUEST FOR PRODUCTION NO. 44: The entire website is protected by U.S. copyright law.

REQUEST FOR PRODUCTION NO. 45: To the extent not produced in response to the foregoing requests, please produce all documents:

1. That relate to or refer in any way to any of the allegations or claims set forth in Plaintiff's Complaint;
2. That relate to or refer in any way to any of the allegations or defenses set forth in Your Answer; or
3. Upon which You will rely to support any of the allegations or defenses set forth in

Your Answer.

RESPONSE TO REQUEST FOR PRODUCTION NO. 45: There are none that I am aware of.

DATED this 7th day of November, 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 SECOND 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 7th day of November, 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 B

From: Erik Stidham
To: [REDACTED]
Cc: [REDACTED]
Subject: FW: Deposition
Date: Monday, November 28, 2022 8:48:46 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)

[REDACTED]
[REDACTED]

Regards,

Erik Stidham
He / Him / His [\(What's this?\)](#)
Partner, Holland & Hart LLP
efstidham@hollandhart.com | T: (208) 383-3934 | 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 email.

From: Erik Stidham <EFStidham@hollandhart.com>
Sent: Saturday, November 26, 2022 6:42 PM
To: Freedom Man Press <freedommanpress@protonmail.com>
Subject: Re: Deposition

Mr. Rodriguez,

Please explain why you refuse to provide any dates in December and provide a detailed explanation as to why you are not available at the time noticed or during the alternative dates we provided. We will expect the information to be verifiable.

Again, we are willing to depose you in Mexico given your past representations to the Court that you are residing part of the time in Mexico.

If you continue to refuse, we will be forced to address this with the Court early next week.

And, Mr. Rodriguez, the Court will determine whether laws and procedural rules are constitutional, not you.

Finally, your hateful statements directed toward the LGBTQ community and toward me do not help our communications. I had hoped my reference to comments from Pope Francis would encourage you to stop. Let's just say I have faith in the Pope's understanding of Jesus's message and reject yours. Let's leave it at that. Just keep your hate to yourself in the future.

Erik Stidham

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From: Freedom Man Press <freedommanpress@protonmail.com>
Sent: Saturday, November 26, 2022 4:31:49 PM
To: Erik Stidham <EFStidham@hollandhart.com>
Subject: Re: Deposition

External Email

Erik -

As already noted, I will be unavailable for the month of December. You do not get to unilaterally make decisions regarding my personal schedule or calendar. It is that simple. I gave you the date of January 10th as my first available date.

However, NO, I will not consent to 2 days. That is ridiculous. You must provide some sort of demonstrable evidence that 2 days is necessary for a simple defamation case—otherwise it should be assumed that you are simply trying to frustrate the case proceedings and add unreasonable levels of billable hours to the case to inappropriately enrich yourself and your vile law firm. Stop being corrupt, Eric. Stop trying to enrich yourself inappropriately by siphoning money from St. Luke's who siphons their money from taxpayers. That is corruption and you are engaging in it. You must stop.

And again, Eric, I am not hiding nor running away from ANYTHING. The fact that you use such terminology again shows your BAD FAITH efforts to deceive and manipulate others who assume you are telling the truth when you communicate. But your lies are being chronicled and detailed for review by the Idaho Public and the Bar Association so they can see EXACTLY how you have lied and EXACTLY how unethical of an attorney you are.

As far as the Idaho Rules of Civil Procedure are concerned, I am more than happy to comply and abide by any and all rules that are Constitutional and sound even though I live outside of Idaho. However, you don't get to make up rules and invent things as you go simply because you have the financial wherewithal to frustrate the proceedings. Your duplicity is being recorded, Eric, and it will be reviewed by those who have authority over your law license.

I have given you a date. Stop lying and acting like I haven't. Accept the date or not—that's your choice. If you choose to accept that date, then I will see you on Zoom on January 10th. Otherwise, have fun in Orlando doing whatever you choose to do as I will not be at the deposition that you chose to unilaterally schedule without asking me for my availability.

Diego Rodriguez
Freedom Man Press

P.S. I will be deposing you in the near future, as well along with Natasha Erickson, Chris Roth, Tracy Jungman, and others. Dr. Erickson will have to answer UNDER OATH, how many children she has referred to CPS and how many times she has used CPS as a threat to coerce families into compliance. Tracy Jungman will have to answer as to how many times she has give medical diagnosis of children without ever having seen the children. You can also expect the discovery requests relatively soon.

St. Luke's makes money from child trafficking, Eric. And you are supporting that. My discovery requests will require St. Luke's to show exactly HOW MUCH MONEY St. Luke's makes from their participation in child trafficking. Also, Chris Roth made millions from COVID. And even Holland and Hart profits from government corruption. But you know that. Your own salary comes from government corruption. You are dirty, Eric. In more ways than one. That is why you work for a dirty law firm with corrupt connections to Idaho government. Thanks to this case—the world will now see it all, as well.

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

On Saturday, November 26th, 2022 at 11:22 AM, Erik Stidham <EStidham@hollandhart.com> wrote:

Mr. Rodriguez,

We do not agree to delay the deposition until January. The deposition likely will take at least two days. We have the right to take your deposition in person. You cannot limit the length of your deposition unilaterally. You are not helping us when you refuse to provide any information as to your schedule or travel plans.

Please provide us with dates within the time frame requested. Otherwise, you will need appear in Orlando

at the time properly noticed or make a motion to vacate the dates.

As for discovery requests, we will be moving to compel and will seek attorneys fees.

Mr. Rodriguez, I again request that you stop hiding and running away from this. You are wasting time and money when you refuse to act in accordance with the rules of civil procedure and the laws of Idaho.

Again, please provide us with dates and proper responses so we can move forward.

Thank you.

Erik Stidham

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From: Freedom Man Press <freedommanpress@protonmail.com>

Sent: Saturday, November 26, 2022 3:48:06 AM

To: Erik Stidham <EFStidham@hollandhart.com>

Subject: Re: St. Lukes_Bundy _ Notice of Videotaped Deposition of Diego Rodriguez/Deposition Scheduling/Deficient Response

External Email

Erik, I will not be available during the entire month of December and I will be out of the country in January. The earliest available date for another deposition will be Tuesday, January 10th. As previously stated, I will attend the court case, hearings, depositions, and any other matters related to the case via Zoom (or other online platform).

Your interest in having an in-person deposition puts a considerable amount of suspicion as to your intentions—as you have demonstrated yourself to be a willful liar and a deceiver. So I am curious as to why you desire to fly to Orlando to have an in-person deposition. In any case, I won't be attending other than via Zoom or other online platform.

Furthermore, this is a simple defamation case. Your job is to try and prove that I intentionally made false claims about St. Luke's and the other plaintiffs—which I did not. It is very cut and dry. Everything I said was true, and still is true. This is not a murder mystery, Eric. There is no need for a 2 day deposition. What a joke! It is evident, that you continue to be unscrupulous and wicked and only seek to frustrate the discovery process and the case proceedings and rack up as many needless billable hours for yourself and your vile law firm. I will consent to a 4 hour deposition via Zoom at maximum. If you can't get what you need in 4 hours for a defamation case, you're just incompetent.

As for the rest of your continually fraudulent claims, I have responded to them below:

Diego Rodriguez
Freedom Man Press

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

On Friday, November 25th, 2022 at 8:33 AM, Erik Stidham <EFStidham@hollandhart.com> wrote:

Mr. Rodriguez,

As you have not responded, we are booking travel arrangements to have your deposition conducted in Orlando on the dates noticed.

Further, we need you to correct the deficiencies in your discovery responses as soon as

possible. Please advise when you will be addressing the deficiencies.

Erik Stidham

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From: Erik Stidham <EFStidham@hollandhart.com>
Sent: Friday, November 18, 2022 10:32:48 AM
To: freedommanpress@protonmail.com <freedommanpress@protonmail.com>
Subject: RE: St. Lukes_Bundy _ Notice of Videotaped Deposition of Diego Rodriguez/Deposition Scheduling/Deficient Response

Mr. Rodriguez,

I would like to have your response regarding deposition scheduling today. We need to get the site and date of your deposition set.

Also, I am setting the deposition soon of Jeremy Lister. I will include you on correspondence regarding scheduling of his deposition. We also will be needing to get depositions, including duces tecum requests, set of your daughter and Mr. Anderson. I would like to do what I can to minimize the disruption relating to scheduling those depositions. If you are in contact with them, I request that you ask them if they would agree to respond to me regarding whether they are willing to accept service.

Other people's private contact information, whether I have it or not, is not my place to give. If you want to contact any of the aforementioned people, you can find them on your own.

And, I want to remind you, especially in light of your bad faith discovery responses, that we seek correspondence (including emails and texts) to Mr. Bundy, PRN, the various podcasts that you have gotten yourself on, web sites you have solicited in your efforts to spread your statements regarding my clients, other Christian Nationalist groups or leaders that you solicited for help, and all other persons or entities that you have communicated with regarding the events relating to this lawsuit. You have a duty to preserve those documents and sanctions will be sought if you fail to preserve them or wrongly refuse to produce them.

I already provided you with the relevant documentation. The only bad faith that exists here is your own.

For example, as indicated before, these blast emails that you continue to send out regarding the case are subject to discovery. You are going to have to provide and identify all of the email addresses to which you send these emails.

The names and email addresses are not relevant to the case and that is privileged information subject to privacy agreements. I simply will never share personal contact information for anyone. Get over it and stop making false claims.

Further, your strategy (if it is a strategy and not just a personal issue) of attacking my firm by repeatedly asserting unchristian invective against the LGBTQ+ community should stop. <https://www.vaticannews.va/en/pope/news/2022-05/pope-letter-fr-martin-lgtb-outreach-questions.html> While we have to communicate because of this litigation, it would help if you cut out the hate speech.

Ha! Eric, are you gay? Answer the question. Are you offended by totally Christian

statements based on pure Bible doctrine because it offends your natural homosexual tendencies or existing homosexual behavior? There really could be no other reason than for you to claim that I am using "hate speech." Only homos make such claims. And only perverts and homosexuals would donate thousands of dollars for "gay pride" events where they are directly sponsoring children's drag shows which are not only immoral but are already illegal according to Idaho state statute. You and your vile law firm should be rotting in jail. So no, pointing out that you are funding and supporting perversion is not "hate speech," it is Christian doctrine and common sense.

Finally, you need to produce all information relating the Telegram chat site that you administer regarding this matter.

There is no "information" regarding the Telegram chat site. Furthermore, someone else runs that group and I've never even met them.

I look forward to your response.
Regards,

Erik Stidham
He / Him / His ([What's this?](#))
Partner, Holland & Hart LLP
efstidham@hollandhart.com | T: (208) 383-3934 | 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 email.

From: Erik Stidham
Sent: Thursday, November 17, 2022 6:27 PM
To: freedommanpress@protonmail.com
Subject: FW: St. Lukes_Bundy _ Notice of Videotaped Deposition of Diego Rodriguez/Deposition Scheduling/Deficient Response

Mr. Rodriguez,

Deposition Set for 12/8-9

Attached is a notice to conduct your deposition in Orlando on December 8, 2022 and continuing on December 9, 2022. Given the scope of your actions and ongoing activities, we may need more than two days, especially if you are not cooperative during the deposition. However, we intend to notice two days of deposition in the hope that may be sufficient. If you would like to discuss setting the deposition for two other consecutive days that week or early the following week, we will make reasonable efforts to accommodate you.

As stated above, I will give you a maximum of 4 hours on Tuesday, January 10th.

Further, based on your prior representations to the Court that you travel for business to Mexico, we can arrange to take your deposition there if that is where you will be during that period. Having said that, we are not willing to tolerate another round of the type of gamesmanship you exhibited when we attempted to coordinate your limited deposition in October.

The only gamesmanship going on is your own. I simply invited others to attend the deposition since it is part of a public court case. One must wonder what you find so intimidating about having the public watch you conduct a deposition.

Given your prior refusal to answer standard questions, we currently have no reason to believe you have any employment obligations or business commitments during that period. To be blunt, we have understandable concerns that you are not really traveling

to Mexico for any business reasons but are simply trying to frustrate efforts to conduct discovery. I ask in advance that you act professionally so that we can get this scheduled.

I answered any and all questions RELEVANT to the case. Given your refusal to only ask questions that are RELEVANT to the case, I have no reason to believe you are actually trying to make real determinations about the case and are actually just trying to rack up billable hours to enrich yourself and your vile law firm. And yes, I do have work outside of the country—not just in Mexico. And to be blunt, given your unabashed support for homosexual perversion, your financial support for children's drag shows, your use of "he, him, his" pronouns in acquiescence to the homo movement, and the fact that you took offense to me publishing this information, with you calling it "hate speech" makes me assume that you are a homosexual and probably a pedophile. Tell me the truth Eric, do you support NAMBLA? Are you a member?

Rule 11 Motion Regarding Answer

We ask that you commit to providing an Amended Answer by 11/22 that properly and honestly responds to the Amended Complaint. If not, we will begin the process of preparing a Rule 11 motion seeking appropriate sanctions.

Deficient Discovery Responses

Your discovery responses were deficient and were done in bad faith. We are preparing a longer deficiency letter, but to get the process started here are some outstanding deficiencies:

- In general, you are withholding documents. You only provided a handful of undated form emails that you sent out. You have not provided responsive emails to and from you. We know you engaged in considerably more communications than that. You also provide no metadata. You provide no emails or texts relating to communications between yourself and Mr. Bundy or PRN. We understand you were engaging in such communications.
- I am not withholding documents. I provided you with DATED emails, and they included every single email I sent out in regards to Baby Cyrus's kidnapping. S top telling lies.
- Please provided legal authority for your contention that as the member of the "press" you can withhold information.
- Members of the press keep their sources private all the time. You're a lawyer, look it up. Furthermore, the information provided to me is now public anyhow (meaning anybody can request it), so it is not relevant.
- ROG 6 – You did not provide address and telephone numbers for persons with knowledge.
- I will never provide private contact information for other people, whether I have it or not. It is not mine to give. In America we have a right to privacy.
- ROG 8 – You did not answer regarding any person you had discussion with related to the allegations in the complaint.
- All the answers I gave you were complete.
- ROG 11 – Figure out what an admission against interest is. That is your responsibility.
- ROG 12 – You need to respond to this.
- I have no insurance other than life insurance and car insurance. But your question is not relevant to the case anyway.
- ROG 14 – You completely failed answering this in any meaningful way.
- My answer was complete and accurate.
- ROG 15 – You failed to respond meaningfully.
- My answer was complete and accurate.
- ROG 28 – You failed to answer without legal basis. You repeatedly made representations regarding this issue in statements at issue in the complaint.

- My answer was complete and accurate.
- ROG 29/30/31/32 – You made these issues by pleading for money based on false statements. We need a response. We are willing to consider aspects of the response to be subject to a confidentiality order.
- I never plead for money based on false statements. Everything I stated was true and continues to be true. And any donations made to the Anderson family belongs to them, not me. It therefore does not pertain to me and is therefore not relevant to the case.
- RFP 16 – You fail to produce documents that you acknowledge elsewhere exist.
- You continue to lie and misrepresent the truth. I will file for sanctions against you personally for your continual lies including a formal complaint with the Bar Association.
- RFP 19 – he failed to provide documents related to Power Marketing LLC
- Anything related to Power Marketing LLC is not relevant to this case.
- RFP 22 – he failed to provide documents showing business relationships with Bundy, but we know Bundy's Campaign received services
- Again, not relevant.
- RFP 23 – refused to produce tax returns as irrelevant and private
- Not relevant.
- RFP 41- refusing to produce documents from “whistleblowers” as a member of the press protecting his source
- Not relevant.

Continuing False Statements

We continue to monitor you defamatory statements and, along with your efforts to spin prior statements. We ask, yet again, that you stop making defamatory comments, especially about Dr. Erickson and Ms. Jungman who did nothing more but care for the Infant even while you were lying to the public and trying to threaten them. You also have an obligation to preserve relevant evidence. For example note that all of your communications and efforts relating to stlukesexposed.com need to be preserved. If you destroy relevant evidence, we will seek sanctions.

We likewise continue to monitor you and your wickedness and your vile law firm. As for Natasha Erickson and Tracy Jungman, they participated in the kidnapping of my grandson. Natasha Erickson's participation was limited but Tracy Jungman's participation was willful, intentional, and sinister. She is an evil woman. The two of you should get along well. And yes, I have already started to collect HORROR STORIES of what goes on at St. Luke's Hospital and how they have treated people over the years. The stories are shocking to the human conscience. And I'm just getting started. I will start running ads soliciting additional stories from the public on radio, Facebook, Google, and YouTube. I'm happy to send them to you in advance so you know when they start running.

Regardless of the outcome of this case, the public will know and see how evil and wicked St. Luke's really is. You can't stop the truth, Eric. Your feeble attempt at silencing me with a frustrating lawsuit will not succeed. St. Luke's got paid for taking Baby Cyrus. That's a fact. They get paid every time a kidnapped child is brought to their facility. That is a fact. They use these children as a means of revenue generation (that is a fact), and thanks to this lawsuit, the details will come to light and the world will know. I will publish everything.

Erik Stidham

(he/his/him)

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 C

November 30, 2022

VIA EMAIL AND US MAIL

Diego Rodriguez
1317 Edgewater Drive, #5077
Orlando, FL 32804
freedommanpress@protonmail.com

**Re: St. Luke's Health System, Ltd, et al. v. Ammon Bundy, et al.;
District Court of the Fourth Judicial District of Idaho, County of Ada
Case No. CV01-22-06789**

Dear Mr. Rodriguez:

This letter addresses multiple discovery deficiencies and your blanket refusals to participate in meaningful discovery. I notified you of many of these deficiencies by email on November 17, 2022. Because we need to schedule your deposition and resolve these disputes in a timely manner, I followed up with you by email on November 18, 2022. I had not received a response from you and again emailed you on November 25, 2022. Your response on November 26, 2022, was not productive and devolved into baseless accusations and name-calling. Nevertheless, I again attempted to meet and confer with an email response on that same day. We exchanged multiple emails that day; yet none of your responses provided any substantive information or justification for your intractable positions. Therefore, to facilitate a productive meet and confer session as required by Idaho Rule of Civil Procedure 37(a)(1), I have set forth our discovery disputes in detail below. Note that we will seek fees and costs if we need to involve the Court.

Deficient Discovery Responses

We have reviewed your responses to Plaintiffs' discovery requests and have identified multiple issues as outlined below. Your categorical refusals to provide responsive information and documents are inappropriate, unsupported, and violate the applicable Idaho Rules of Civil Procedure.

Interrogatory No. 6: We requested the name, address, and telephone number of every person with knowledge of the subject matter of this lawsuit, as well as the knowledge possessed by each person. While you provided a few names, you did not provide the address, telephone number, or knowledge possessed by these people. You have refused to provide contact information, without any authority or justification. A protective order would protect this information, but you have not requested one. This response is incomplete and must be supplemented.

Location
800 W. Main Street, Suite 1750
Boise, ID 83702-7714

Mailing Address
P.O. Box 2527
Boise, ID 83701-2527

Contact
p: 208.342.5000 | f: 208.343.8869
www.hollandhart.com

Interrogatory No. 8: In addition to any person you interviewed, we requested each person you have had any discussion with relating to the subject matter of this litigation or any allegation in this litigation, along with the substance and date of such discussions, and other persons involved in such discussion. You did not respond to this portion of the interrogatory and therefore your response is incomplete and must be supplemented.

Interrogatory No. 11: We requested any admission against interest you contend was made by any Plaintiff or representative of any Plaintiff. Your only response was to state that you do not understand what this means. It is your responsibility, because you have chosen to participate in this litigation without counsel, to figure out what this means. Your response is incomplete and must be supplemented.

Interrogatory No. 14: We asked you to identify all communications, conversations, discussions, or correspondence you have had on any public or non-public forum, including, but not limited to, forums like Telegram, MeWe, Rumble, Gab, or through People's Rights Network, between March 1, 2022 to the present, relating to any issue in this lawsuit. You identified a single article posted on freedomman.org. This is wholly inadequate. You produced emails that should have been identified in response to this Interrogatory. We all know you have engaged in additional conversations and communications that are not identified in response to this Interrogatory. The fact that we know of other responsive information does not alleviate you of your obligation to provide the information you have in your possession. *See Idaho Rules of Civil Procedure 26(b)(1)(A), 34(a).* Moreover, the communications you produced are incomplete and do not include relevant metadata. Your response is incomplete and must be supplemented.

Interrogatory No. 15: We requested that you identify all forms, methods, apps, or types of communication you used to communicate with any person about any issue involved in this lawsuit, including forms of communication to communicate with members of People's Rights Network. Your incomplete answer stated only that text and email are used with People's Rights Network, but did not provide any additional information, and disregarded the remainder of this Interrogatory. Moreover, this Interrogatory is not limited to communications regarding this lawsuit, as you are aware. Your response is incomplete and must be supplemented.

Interrogatory No. 28: We requested you identify the total amount of money or other things of value donated to, raised by, received by, or collected by you or your immediate family, including any business entity owner or controlled by you or your immediate family, from March 1, 2022, to the present. You stated that you have not received any money from the "Baby Cyrus" case. But you did not address whether any of your immediate family or a business entity owned or controlled by you or your immediate family received any money or other things of value. You have repeatedly made public representations on this issue, some of which are identified in the Amended Complaint. Your response is incomplete and must be supplemented.

Interrogatory Nos. 29, 30, 31, 32: We requested information regarding the amount of money charged to the Infant's family relating to medical expenses, the amount of liability incurred by the Infant's family for medical expenses, and the amount of public assistance,

insurance coverage or charitable donations provided to the Infant's family relating to medical expenses. You refused to respond, stating that this is private information. Your baseless and unsupported assertions of privacy do not negate the relevancy of these discovery requests or Plaintiffs' right to discover the information. Your conduct in seeking donations based on false assertions puts this information directly at issue in this litigation, which is relevant to Plaintiffs' claim of violation of the Idaho charitable solicitation act. Your claims to privacy are especially fallacious considering your intentional and public violations of Plaintiffs' privacy. Your responses are incomplete and must be supplemented.

Request for Production No. 16: We requested all documents, specifically including text messages, emails, or other communications, exchanged between you and any Defendant in the lawsuit, relating to the matters set forth in the Amended Complaint. You responded that there are none. Yet elsewhere in your responses and your public statements you state that you communicated by text and email with Defendant Ammon Bundy. Your response is incomplete and must be supplemented.

Request for Production No. 19: We requested articles of incorporation or other founding documents, certificates of organization, operating agreements, by-laws, shareholder agreements, or statements or certificates of limited partnership. You responded that you provided this information for Power Marketing Consultants, LLC. It appears you are referring to Answer to Interrogatory No. 23, wherein you state you have ownership and control of Power Marketing Consultants, LLC, which is registered in Idaho. That statement does not satisfy your obligations under Idaho Rule of Civil Procedure 34 and fails to address the other entities, legal or fictional, that you have created. You later claimed that information related to Power Marketing, LLC is not relevant to this case. You are incorrect. Your defamatory and tortious conduct at issue in this case has been perpetrated through a variety of legal or informal entities and their nature and existence are directly relevant to Plaintiffs' claims of unfair business practices and violations of the Idaho Charitable Solicitation Act. Your response is incomplete and must be supplemented.

Request for Production No. 22: We requested documents demonstrating contracts or business relationship between you and any entity owned or controlled by you and Ammon Bundy or any entity or association owned or controlled by Ammon Bundy, including but not limited to People's Rights Network and Abish-Husbondi. You initially stated that there are none, they later protested the relevance of this information. We know that one or more of your entities has been involved with Mr. Bundy's campaign for Governor. These documents are responsive and relevant to the claims of unfair business practices and the conspiracy between Defendants. Your response is incomplete and must be supplemented.

Request for Production No. 23: We requested your State and Federal income tax returns for the years 2021 and 2022. You objected that this information is private and not relevant. As previously stated, you did not request a protective order to safeguard your private information. The fact that you deem information private does not relieve you of your obligations under Idaho Rule of Civil Procedure 34. Moreover, this information is relevant to Plaintiffs

claims of unfair business practices, violations of the Idaho Charitable Solicitation Act, and the conspiracy between Defendants. Your response is incomplete and must be supplemented.

Request for Production No. 37: We asked for all documents and records showing the receipt, payment, loan, and/or transfer of money or funds by and between you, Ammon Bundy, Ammon Bundy for Governor, Freedom Man PAC, Freedom Man Press, GiveSendGo, People's Rights Network, Abish-husbondi, Dono Custos, Freedom Tabernacle, Power Marketing Consultants, Power Marketing Agency, and/or the immediate family of any of the foregoing. You stated only that Mr. Bundy is buying an RV from you. You have publicly stated that money raised on GiveSendGo is supporting your opposition to this lawsuit. And you or one of your entities has contributed to Ammon Bundy for Governor. This information is relevant to Plaintiffs claims of unfair business practices, violations of the Idaho Charitable Solicitation Act, and the conspiracy between Defendants. Your response is incomplete and must be supplemented.

Request for Production No. 41: We requested all documents and communications from “whistleblowers” as discussed in your April 29, 2022 article on freedomman.org entitled “Insider Information from a Whistleblower!”. You stated that you deleted any communications for privacy purposes at the end of April 2022, and that you have a duty, as a member of the press, to protect your sources. You further objected to the relevance of this information. First, you do not qualify for a limited privilege as a member of the press. Such privilege does not apply to a blogger, as you have identified yourself; it only applies to reporters working for established newspaper or television broadcasting services. *See, e.g., State v. Salsbury*, 129 Idaho 307, 307-08, 924 P.2d 208, 208-09 (1996). Second, under the balancing test established by *In re Contempt of Wright*, 700 P.2d 40, 44-45 (Idaho 1985), any journalistic First Amendment rights you claim are outweighed by the overriding interest in the information that is directly relevant to your defamatory statements about Plaintiffs. Your claim that you deleted this information is dubious at best and unsupported by any additional information. Finally, the fact that anyone could obtain the information you possess that is responsive to this request does not eliminate your obligation to produce the information. *See Idaho Rules of Civil Procedure 26(b)(1)(A), 34(a)*. Your response is incomplete and must be supplemented.

Documents promised during deposition

During your deposition on October 5, 2022, you agreed to provide additional information that you either could not remember or could not state with certainty. I sent you a letter regarding that information on October 28, 2022, and listing the specific information you agreed to provide. To date, you have not provided all of the information you previously agreed to provide, nor have you responded to my letter. Specifically, you have not:

- identified the host for the Freedom Man website;
- identified when you first began using the State Street address in Boise for Freedom Man Press and freedomman.org or the date you discontinued using that address;

- identified the steps you took to formally close Freedom Man PAC; and
- provided information regarding the Disqus commenting system you use on the Freedom Man website, including whether you pay for the service and the cost of the service.

Please immediately provide this information that you already agreed to.

In-person Deposition

Your refusal to cooperate in discovery by appearing for a deposition is not justified. While we are obligated to work together to schedule this deposition, you have provided no reason why your deposition cannot take place in December. To date, you have not explained why you are supposedly traveling other than making vague statements about business and engaging in scuba diving.

You have also categorically refused to appear for your deposition in-person, despite my offer to come to your location in either Florida, Mexico, or wherever else you might be. The Idaho Rules of Civil Procedure authorize depositions in-person, unless the parties agree to a remote deposition or the Court orders a remote deposition. *See Idaho Rule of Civil Procedure 30(b)(4).* I am entitled to take your deposition in person and will not agree to conduct this deposition over Zoom. You have not provided any reason or authority supporting your refusal.

Finally, you have no authority to arbitrarily limit the time of your deposition. Your evasive tactics and intentional delay so far in this case support my request for a two-day deposition. There are no rules limiting the length of your deposition and your attempt to create new rules for your own benefit will not be tolerated. The discovery allowed under the Idaho Rules of Civil Procedure is broad and you do not get to dictate the scope of this case. This is especially true given the broad scope of your statements and your ongoing wrongful conduct. Further, we are entitled to discover the financial and other connections between the defendants in this case.

Please provide your availability and location for two days prior to December 20, 2022 so that we can proceed with your deposition. If you are not available on two consecutive days in that period, please provide us with all available dates during that period. Alternatively, if you will stop with the gamesmanship and provide evidence that you really are obligated, we can discuss try to make alternative dates work.

Deficient Answer

In my email to you on November 17, 2022, I informed you that your Answer is deficient and needs to be amended. You have not addressed that issue or agreed to file an Amended Answer.

Your Answer is deficient and violates Idaho Rule of Civil Procedure 11. It must be amended to comply with the Rules. Under Rule 11(b), by signing and filing your Answer, you

certified to the Court that, to the best of your knowledge, formed after a reasonable inquiry, your denials of the facts stated in the Amended Complaint are warranted. The Idaho Rules of Civil Procedure apply to you when you appear *pro se*. *Rocky Mtn. Power v. Jensen*, 154 Idaho 549, 556, 300 P.3d 1037, 1044 (2012). Your Answer denies the following paragraphs, which we both know must be admitted, in whole or in part: ¶¶ 4(4), 12, 14, 15, 17, 25, 29, 42, 43, 46, 63, 66, 71, 86, 88, 89(a), 89(d), 89(f), 94, 95, 96, 97, 99, 104, 107, 108, 109, 110, 112, 114, 142, 143, 144, 154, 158, 162, 164, 165, and 176. You've already demonstrated in your Answer that you understand how to admit parts of a paragraph without admitting the entire paragraph, when appropriate. Your own statements, conduct, and online posts, all made before the date of your Answer, demonstrate that these paragraphs are true and cannot be denied. If you refuse to amend your Answer, you will be subject to sanctions by the Court. *See* Idaho Rule of Civil Procedure 11(c).

Please advise if a meeting to confer on any of these deficiencies is necessary, and if so, provide available dates and time for such a meeting. If I do not hear from you, by phone or in writing, by 10am on December 2, 2022, I will pursue relief from the Court.

Very truly yours,

Erik F. Stidham
Partner
of Holland & Hart LLP

EFS:cmc

20406171_v1

EXHIBIT D

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

----- 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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* * * * *

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

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

9 FOR THE PLAINTIFFS

10 Erik F. Stidham

Zach McCraney

11 HOLLAND & HART, LLP

800 West Main Street, Suite 1750

12 Boise, Idaho 83702

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14 Aubrey Lyon

David Barton

15 ST. LUKE'S HEALTH SYSTEM

190 East Bannock Street

16 Boise, Idaho 83712

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17 lyona@slhs.org

bartond@slhs.org

19 FOR DEFENDANT DIEGO RODRIGUEZ

20 Diego Rodriguez, pro se

freedommanpress@protonmail.com

22 ALSO PRESENT

Tracy Jungman

24 VIDEOGRAPHER

25 Spencer Harrison, Tucker & Associates

Page 4

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.

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 ///

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**

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**

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.

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.**

1 **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

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**

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**

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

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

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?

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

<p style="text-align: right;">Page 17</p> <p>1 institution? 2 A. Nope. 3 Q. So, Mr. Rodriguez, can you identify for 4 me each and every person who has any control 5 over -- strike that. 6 Can you identify for me any person who 7 has had any control over the FreedomMan.org 8 website during the period of 2021 to present? 9 A. It's just me. You don't even have to 10 say during the period. The only person who has 11 ever had access and control of it from the time it 12 began until now is just me. 13 Q. Okay. Can you identify for me -- I'm 14 going to have some follow-up questions on that. 15 A. Okay. 16 Q. But just to move through, can you 17 identify any person -- each and every person, I 18 should say, who has any ownership interest in the 19 FreedomMan.org website? 20 A. Just me. 21 Q. With regard to the ownership, is it -- 22 is the website registered in your name? 23 A. It should be. 24 Q. Diego Rodriguez? 25 A. Yep.</p>	<p style="text-align: right;">Page 19</p> <p>1 Q. Okay. And there's no other -- no 2 payments received through subscription? 3 A. No, there's no subscriptions. You 4 can't pay to be a part of anything. 5 Q. Okay. 6 A. You can look at the website. We don't 7 have anybody running ads on there. 8 Q. Okay. Does FreedomMan.org allow folks 9 to donate to the Freedom Man PAC? 10 A. I'm sure we've made that request before 11 in the past. That would have been a long time ago 12 during the Butch Otter and Otter Care days. So 13 we're talking 2014. When was that, when Butch was 14 pushing Otter Care on everybody? 2012? 2014. 15 Q. Okay. So are you testifying that there 16 has been no request for donations made through the 17 FreedomMan.org website for the Freedom Man PAC 18 during the period of 2021 to present? 19 A. Not that I can remember, no. 20 Q. All right. Let me ask you about what 21 is represented to be Freedom Man Press. 22 First, what is Freedom Man Press? 23 A. It's just me. It is the name I use for 24 that website. That website is my personal blog. 25 I write about issues of constitutional rights. I</p>
<p style="text-align: right;">Page 18</p> <p>1 Q. Okay. And which entity do you register 2 the website through? 3 A. That's a good question. Probably 4 Bluehost, but maybe GoDaddy. No, that wouldn't be 5 GoDaddy. I'll have to follow up on that to give 6 you specifics. I don't remember. I have several 7 different registrars that I use for various for 8 web properties that I control. 9 Q. Okay. And who -- fair enough. 10 Just at this point in time, you can't 11 recall whether it is GoDaddy or another entity? 12 A. Correct. Correct. It's more likely 13 Bluehost than GoDaddy. I don't use GoDaddy for 14 that many. But I'll have to double-check. 15 Q. Would you agree to provide us that 16 information when you're able to check? 17 A. Absolutely, absolutely. 18 Q. All right. With regard to any revenue 19 generated by FreedomMan.org, who receives that? 20 A. Nobody receives any revenue because 21 there is no revenue generated by it. 22 Q. Well, it appears that there are ads 23 that are run on the Freedom Man website; is that 24 correct? 25 A. There are no ads on the website.</p>	<p style="text-align: right;">Page 20</p> <p>1 write about issues of freedom. It's my own 2 personal blog, and I call it Freedom Man Press 3 because we are taking our First Amendment right, 4 God-given right, to speak freely. And that is the 5 right of the press to speak freely. And so, hey, 6 we are Freedom Man Press, and that is me. That is 7 my blog and my website. 8 Q. So has there ever been any formal 9 entity, legal entity, that has been formed that 10 has been identified as Freedom Man Press? 11 A. No. 12 Q. Any steps ever taken to form an entity 13 that is -- 14 A. No. 15 Q. -- Freedom Man Press LLC? 16 A. Nope. 17 Q. All right. And, again, Mr. Rodriguez, 18 I do have that tendency to pause in my questions. 19 So just do your best to let me get it out. I 20 apologize. I'll do my best to avoid it. 21 With regard to control of the website, 22 are you contending that -- I just want to make 23 sure I'm clear that no one else, other than you 24 and yourself, has ever had control of the website 25 ability, and I would include in that,</p>

<p style="text-align: right;">Page 21</p> <p>1 Mr. Rodriguez, the ability to upload any articles, 2 change any texts? 3 A. Nope, just me. 4 Q. Okay. So you are the only person who 5 has ever had the ability to change texts or upload 6 articles to the FreedomMan.org website; is that 7 correct? 8 A. That is correct. 9 Q. Are you the only person who has ever 10 provided content for the FreedomMan.org website? 11 A. I'm the only person who has provided 12 content for the FreedomMan.org website. However, 13 I have requested permission from other people who 14 have written articles from time to time that I 15 found valuable to post articles on my website. 16 Excuse me. 17 And so, yes, I have posted other 18 articles from other people on the website, but 19 it's always noted who that article is from, who it 20 was written by, and there's always a link to the 21 original source. 22 Q. Okay. So if this -- there's not an 23 identification on the article -- 24 A. Then I wrote it. Sorry, I should let 25 you finish.</p>	<p style="text-align: right;">Page 23</p> <p>1 use? 2 A. It's RapidWeaver. 3 Q. Okay. Mr. Rodriguez, I'm going to 4 share -- try to do my best to share a screenshot 5 with you here in a second. 6 A. Okay. 7 Q. I'm a little clumsy with this. So 8 please be as patient as you can. 9 Mr. Rodriguez, if I have done it 10 properly, you should have a share-screen that 11 identifies the Freedom Man privacy policy. 12 Do you see that, sir? 13 A. Yeah. 14 Q. All right. So I'll represent to you 15 that this is a screenshot that was obtained from 16 the Freedom Man website relating to the privacy 17 policy. 18 A. Okay. 19 Q. And it has three pages on the document. 20 I'm happy to provide it to you in a PDF form if 21 you need it that way. But if you can see it 22 clearly now, I would like to proceed and ask you a 23 couple questions. 24 A. Yep, I can see it. 25 Q. Are you familiar with this screenshot</p>
<p style="text-align: right;">Page 22</p> <p>1 Q. Yeah. And, again, we just need to make 2 sure the transcript is clean so we can avoid 3 having to do this again. 4 So am I understanding correctly that if 5 there is an article and there's no identification 6 as to who might have written that article or that 7 text, you would be the responsible party? 8 A. Yes. 9 Q. Okay. Do you know what type of 10 platform the FreedomMan.org website works on? 11 A. It's called RapidWeaver. 12 Q. And are you the individual who actually 13 goes in and uses the software and uses the 14 platform to make changes? 15 A. Yes. 16 Q. So, Mr. Rodriguez, is there ever 17 another person, a third party, and I'm asking just 18 kind of administratively, who does the 19 administration of modifying the website other than 20 yourself? 21 A. No. Nope, just me. 22 Q. Okay. And is that the only -- well, 23 let me make sure I understand your response. 24 If I were to ask you what software you 25 use to control the website, what software do you</p>	<p style="text-align: right;">Page 24</p> <p>1 on the website, the Freedom Man privacy policy? 2 A. Yep. 3 Q. Okay. And did you write the privacy 4 policy? 5 A. No. I used some boilerplate software. 6 There's some software you can go on the Internet 7 and tell them to make a privacy policy for you. 8 And you just input some basic data, and then they 9 spit it out, and then you post it. 10 Q. Okay. So -- 11 A. I'm not a legal guru. So I don't know 12 how to write legal stuff. 13 Q. Okay. So I direct your attention, if I 14 could -- and by the way, we're going to mark this 15 as Exhibit 1 to your deposition. All right? 16 A. Okay. 17 (Exhibit 1 marked.) 18 Q. The way things will go is subsequent 19 deposition exhibits will just be numbered and 20 then, of course, be sequential. Okay? 21 A. Okay. 22 Q. Okay. So taking a look at what we've 23 agreed to mark as Exhibit 1, it's the Freedom Man 24 website privacy policy; correct? 25 A. Um-hmm. Yes.</p>

1 Q. When I look at the first page there, it
 2 states in the second sentence, "This website is
 3 wholly owned by Freedom Man Press LLC."
 4 Do you see that?

5 A. Yes.

6 Q. Okay.

7 A. So it must be how I filled it out when
 8 I filled out the form.

9 Q. Okay. So just so the record is clear,
 10 is that a false statement that this --

11 A. It's an incorrect statement because
 12 there is no existing Freedom Man Press LLC. But
 13 that must have been how I filled out the original
 14 form when I was creating a privacy policy.

15 Q. Okay. And then it continues on, it
 16 makes another reference to --

17 A. Yes, so that needed to be updated
 18 because it doesn't exist. Freedom Man LLC doesn't
 19 exist -- or Freedom Man Press LLC doesn't exist.

20 Q. Mr. Rodriguez, let me get my question
 21 out so we're not talking over one another. Okay?

22 A. Okay.

23 Q. All right. So is it fair to say that
 24 there are no -- and I'm looking at this last
 25 sentence in the second paragraph, that there are

1 Q. Okay. And the first -- we're going to
 2 mark this as Exhibit 2 to your deposition.

3 (Exhibit 2 marked.)

4 The first page is some material
 5 identifying how the screenshot was captured and
 6 when.

7 But if I could direct your attention to
 8 the next page, do you see where it says
 9 "Freedom Man Press"? Do you see that, sir?

10 A. "About Freedom Man Press"? Yes, sir.

11 Q. "About Freedom Man Press"?

12 A. Yep.

13 Q. And do you recognize this as a
 14 screenshot from the Freedom Man website that you
 15 operate?

16 A. Yes, I do. Excuse me.

17 Q. Okay. If we look on there as
 18 Freedom Man staff on this website -- excuse me,
 19 this web page, it identifies Diego Rodriguez as
 20 communications and marketing director.

21 Is that you?

22 A. Yep, yep.

23 Q. Okay. It identifies a Gunner Steele,
 24 staff columnist.

25 Who is Gunner Steele?

1 no services offered by any entity called
 2 Freedom Man LLC?

3 A. No, there's no services offered by
 4 Freedom Man LLC other than just providing
 5 information on that blog that is free to the
 6 public.

7 Q. Okay. And, again, Freedom Man LLC,
 8 just so we're clear, never was and never has been
 9 an entity?

10 A. No, neither Freedom Man Press LLC nor
 11 Freedom Man LLC.

12 Q. Is it fair to say that there is no such
 13 organization called Freedom Man Press?

14 A. It's fair to say that. Yeah. I am
 15 Freedom Man Press. I am Freedom Man. I am
 16 Freedom Man Press. I am FreedomMan.org. I'm all
 17 of those.

18 Q. Okay. I would like to put up another
 19 document for us.

20 A. Okay.

21 Q. Tell me when this is up on the share
 22 screen.

23 Do you see a document up on the screen,
 24 sir?

25 A. Yep.

1 A. Yep. That's a pseudonym that I use to
 2 write articles. Such is me.

3 Q. Okay. And then the next name is -- and
 4 I apologize. I don't want to mispronounce it.

5 Would you pronounce -- and I believe
 6 that's your --

7 A. Micaiah.

8 Q. And how do you pronounce the last name?

9 A. Micaiah Chavoya.

10 Q. And Ms. Chavoya --

11 A. No, it's a dude. It's my son.

12 Q. Okay. Sorry.

13 So Mr. Chavoya, who is he?

14 A. He's my son.

15 Q. Okay. And how old is he?

16 A. He just turned 18.

17 Q. Okay. And what role does he have at
 18 the Freedom Man website?

19 A. Nothing. He just helps us at events
 20 and things like that. So we have events from time
 21 to time. So, you know, we've participated in many
 22 events there at the Capitol, for example, when we
 23 were protesting against the unlawful use of face
 24 masks from the governor, et cetera. He helps out.
 25 He's my son.

<p style="text-align: right;">Page 33</p> <p>1 action of the website?</p> <p>2 A. Not of the website, but just part of</p> <p>3 Freedom Man as a group. Like I said earlier in</p> <p>4 the deposition, one of the things that we do often</p> <p>5 is we have events that we hold. And we have these</p> <p>6 events at the Capitol, at wherever, and my family</p> <p>7 assists me with putting on those events. They</p> <p>8 assist me with the sound system. They assist me</p> <p>9 with setting things up, et cetera. And so, yeah,</p> <p>10 we put his name on there as an ambassador for</p> <p>11 action.</p> <p>12 Q. So at any point in time, did</p> <p>13 Mr. Anderson have any input regarding the content</p> <p>14 or subject matter of the FreedomMan.org website?</p> <p>15 A. Never once.</p> <p>16 Q. Okay. Has he ever provided any content</p> <p>17 of any kind for the Freedom Man website?</p> <p>18 A. No. No, he has not.</p> <p>19 Q. So, Mr. Rodriguez, I have attempted to</p> <p>20 share the screen again.</p> <p>21 A. Yeah.</p> <p>22 Q. Do you see where it says "Freedom Man,</p> <p>23 About Freedom Man Press"?</p> <p>24 A. Yep.</p> <p>25 Q. It's a five-page document that contains</p>	<p style="text-align: right;">Page 35</p> <p>1 Freedom Man staff member?</p> <p>2 A. It was nothing. He never had any</p> <p>3 control over any of the content or anything. He</p> <p>4 was just a figure name that we used on the website</p> <p>5 because he participated with us in many events</p> <p>6 that we held.</p> <p>7 Q. Okay. So, again -- and, again, I'm</p> <p>8 just trying to make sure we're clear so we can</p> <p>9 move forward in this litigation.</p> <p>10 Are you testifying that Mr. Anderson at</p> <p>11 no point in time, despite having the title of</p> <p>12 executor director, despite you having placed that</p> <p>13 on the website that you control, at no point in</p> <p>14 time did Mr. Anderson have any substantive role</p> <p>15 with Freedom Man Press?</p> <p>16 A. At no time did he have any substantive</p> <p>17 role. At no time did he create any content, post</p> <p>18 any content, or have any access to the</p> <p>19 FreedomMan.org website in any way, shape or form.</p> <p>20 Q. So I'll represent to you -- but I don't</p> <p>21 want to take too much time on this deposition.</p> <p>22 We're going to have plenty of deposition time</p> <p>23 later on, I think, as this litigation progresses.</p> <p>24 I'll represent to you that I believe I have seen</p> <p>25 columns posted on the FreedomMan.org website that</p>
<p style="text-align: right;">Page 34</p> <p>1 screen content from the FreedomMan.org website.</p> <p>2 We're going to mark this Exhibit 4 to your</p> <p>3 deposition.</p> <p>4 A. Okay.</p> <p>5 (Exhibit 4 marked.)</p> <p>6 Q. Does this look like a true and accurate</p> <p>7 printout of content from the website?</p> <p>8 A. Yeah, it looks like it's missing some</p> <p>9 info, like kind of a big blank page. But, yeah.</p> <p>10 Q. I'll represent to you that that's just</p> <p>11 a function of printing out the screen that it</p> <p>12 printed out.</p> <p>13 A. Okay, gotcha.</p> <p>14 Q. So if you take a look here, what is</p> <p>15 page 3 of what we're marking as Exhibit 4 to your</p> <p>16 deposition, you'll see identified on the website</p> <p>17 is Levi Anderson as executive director?</p> <p>18 A. Yep.</p> <p>19 Q. Okay. Is it fair to say that you</p> <p>20 control the content and you're the one who</p> <p>21 identified Mr. Anderson as executive director on</p> <p>22 the website?</p> <p>23 A. Yes, that is fair to say.</p> <p>24 Q. Okay. What was Mr. Anderson's role as</p> <p>25 executive director of the Freedom Man -- as a</p>	<p style="text-align: right;">Page 36</p> <p>1 have in their byline Mr. Anderson.</p> <p>2 If I'm accurate and that there are</p> <p>3 articles that have in their byline as being</p> <p>4 written by Mr. Anderson, are you testifying that</p> <p>5 would be false or incorrect?</p> <p>6 A. It would be incorrect in the sense that</p> <p>7 if it was posted with his name on it, then he</p> <p>8 allowed it to happen, but it was ghost written by</p> <p>9 me.</p> <p>10 Q. Okay. What was the purpose of having</p> <p>11 an article listed as having been written by</p> <p>12 Mr. Anderson when, in fact, you had written it?</p> <p>13 A. I don't know. I would have to see the</p> <p>14 article to remind myself of what the reason for it</p> <p>15 was.</p> <p>16 Q. Okay. Fair enough.</p> <p>17 Let me ask you this so we can get more</p> <p>18 focused on -- try to focus the question more on</p> <p>19 what's kind of before us in this lawsuit.</p> <p>20 At any point in time, has anyone</p> <p>21 provided any content relating to the issues with</p> <p>22 St. Luke's other than yourself?</p> <p>23 A. Nope, just me.</p> <p>24 MR. STIDHAM: Madam Court Reporter, I want</p> <p>25 to make sure my count is correct.</p>

<p style="text-align: right;">Page 37</p> <p>1 Next would be No. 5?</p> <p>2 THE REPORTER: Correct.</p> <p>3 MR. STIDHAM: Thank you.</p> <p>4 BY MR. STIDHAM:</p> <p>5 Q. So let me ask you -- move on to 6 different topic or different general category of 7 interrogatories, Mr. Rodriguez.</p> <p>8 Can you identify for me, what was the 9 principal place of business for Freedom Man Press?</p> <p>10 A. There is no principal -- go ahead, 11 finish.</p> <p>12 Q. During the period of 2021?</p> <p>13 A. There was no principal place of 14 business other than just me and my laptop.</p> <p>15 Wherever I happen to be and wherever I am with my 16 laptop, that's the place of business.</p> <p>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.</p> <p>21 A. Sure.</p> <p>22 Q. What is that associated with?</p> <p>23 A. That's just a PO box that I have.</p> <p>24 Q. Okay. So how long did Freedom Man 25 Press and/or the FreedomMan.org website use the</p>	<p style="text-align: right;">Page 39</p> <p>1 responsible for identifying address and contact 2 information for the FreedomMan.org website?</p> <p>3 A. Yes.</p> <p>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.</p> <p>8 A. Sure.</p> <p>9 Q. Which is a political-based action 10 committee that you were in charge of that no 11 longer exists; is that correct?</p> <p>12 A. That is correct.</p> <p>13 Q. Okay. When did Freedom Man PAC cease 14 to exist?</p> <p>15 A. Once I moved out of Idaho.</p> <p>16 Q. Did you formally close the political 17 action committee?</p> <p>18 A. Yes.</p> <p>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.</p> <p>24 A. Anything posted on there was written by 25 me.</p>
<p style="text-align: right;">Page 38</p> <p>1 State Street, Boise address?</p> <p>2 A. I couldn't tell you off the top of my 3 head.</p> <p>4 Q. Can you give me just an estimate of 5 time?</p> <p>6 A. No.</p> <p>7 Q. Okay.</p> <p>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.</p> <p>11 Q. Well, we're going to have some 12 documents that might help us with timeframe, but 13 we can follow it up.</p> <p>14 A. Okay.</p> <p>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.</p> <p>18 A. Again, off the top of my head, I 19 wouldn't know what to tell you.</p> <p>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?</p> <p>24 A. I don't remember.</p> <p>25 Q. Okay. Are you the individual who is</p>	<p style="text-align: right;">Page 40</p> <p>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.</p> <p>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?</p> <p>11 A. I don't understand how that question is 12 different from the question you just asked before.</p> <p>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.</p> <p>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.</p>

1 The first part is any person that wrote
 2 an article regarding Natasha Erickson on the
 3 Freedom Man website, that was you; correct?
 4 A. Correct.
 5 Q. Okay. Any person that authored any
 6 content relating to Dr. Natasha Erickson on the
 7 website, that was you; correct?
 8 A. Correct.
 9 Q. Any person that edited any content
 10 relating to Dr. Natasha Erickson on the
 11 Freedom Man website, that was you; correct?
 12 A. Correct.
 13 Q. And then this is the component, sir,
 14 that I wanted to make sure I'm understanding your
 15 answer to, and that is "otherwise contributed
 16 content." So what I am trying to understand
 17 there, let me try to rephrase it. Hopefully, we
 18 can be communicating a little bit more directly.
 19 Did anyone, other than yourself,
 20 provide the information or evidence that you
 21 relied upon in writing any content relating to
 22 Dr. Erickson that was posted on the Freedom Man
 23 website?
 24 A. Okay. To that, yes.
 25 Q. Okay. Who did?

1 A. So that would be my family. That would
 2 be my son-in-law, my daughter, those who actually
 3 directly interfaced with Dr. Natasha Erickson.
 4 They were the ones who were mistreated by her,
 5 threatened by her, et cetera. And they're the
 6 ones who shared their story with me that I
 7 repeated and posted.
 8 Q. Okay. So let me just make sure I've
 9 got the entire universe or set of people that
 10 provided you information that contributed to the
 11 content that you wrote regarding Dr. Erickson.
 12 Am I correct in understanding that your
 13 daughter and your son-in-law are the only
 14 individuals that provided you any information that
 15 you relied on in generating the content relating
 16 to Dr. Erickson that was posted on the Freedom Man
 17 website?
 18 A. That is correct. It was my daughter,
 19 Marissa Anderson, and my son-in-law,
 20 Levi Anderson.
 21 Q. I'm going to share a screen again,
 22 Mr. Rodriguez. Give me a moment.
 23 A. Okay.
 24 (Exhibit 5 marked.)
 25 Q. Mr. Rodriguez, if it worked correctly

1 you should have on your screen what we're going to
 2 be marking Exhibit 5 to your deposition. And
 3 that's some screen content from the FreedomMan.org
 4 website with the heading "People responsible for
 5 Cyrus's kidnapping."
 6 Do you see that?
 7 A. Yes, I do.
 8 Q. Let me just scroll through it a little
 9 bit so you have a chance to see it. This is
 10 page 1. The heading, again, says "People
 11 responsible for Cyrus's kidnapping." And then
 12 you've got a heading down here -- excuse me,
 13 you've got it in a parenthetical, the reference
 14 "child trafficking ring."
 15 Do you see that?
 16 A. Yep. Yes, I do.
 17 Q. Okay. And I'm correct in understanding
 18 that you're the one who generated the phrase
 19 "People responsible for Cyrus's kidnapping";
 20 correct?
 21 A. Yes, I am.
 22 Q. Okay. You are the one who generated
 23 and wrote here "child trafficking ring"; correct?
 24 A. That is correct.
 25 Q. Okay. And then if we go a little bit

1 further down the page, it says "Main people
 2 responsible for baby Cyrus's kidnapping."
 3 Do you see that?
 4 A. "The main people," yeah.
 5 Q. Okay. Thank you for that correction.
 6 And then you placed immediately below
 7 that heading a picture of Dr. Erickson; correct?
 8 A. Yep.
 9 Q. Okay. And you're the one who did that?
 10 A. Yep.
 11 Q. Okay. And then, also, you posted a
 12 link relating to Dr. Erickson there; correct?
 13 A. Yep. Everything on there, on that
 14 entire page from Dr. Erickson all the way down to
 15 everybody else on that page, I posted all of their
 16 information.
 17 Q. Okay. All right. So this is -- I just
 18 want to make sure we've got a sense for the
 19 exhibit.
 20 Below Dr. Erickson, you posted --
 21 you're the individual who posted a picture of
 22 Judge Fortier and wrote, "She's the unjust judge";
 23 correct?
 24 A. Correct.
 25 Q. And you wrote that "she's disgusting";

1 correct?

2 A. Yep. Everybody, all those folks,
3 you can keep going down the list.

4 Q. Okay. Just -- and I will go quick.

5 We'll have a chance to talk about this more in
6 other depositions.

7 So, just so we can make sure we
8 identify the exhibit, there's Mr. Dykstra
9 identified and then Ms. Loufoua, a social worker;
10 correct?

11 A. Correct.

12 Q. And then if you get to page 3 of the
13 exhibit, there's police Detective Hansen, police
14 Detective Fuller, and then starting -- and
15 continuing on to page 4 is Sergeant McGilvery;
16 correct?

17 A. Yep.

18 Q. Officer King, and then you posted a
19 video; correct?

20 A. Correct.

21 Q. Okay. All right. So at the risk of
22 belaboring it, you were 100-percent responsible
23 for all of that; correct?

24 A. Yes, I was.

25 Q. Getting back to the question I had

1 that from, it was from Marissa and Levi who told
2 me their experience while they were there at
3 St. Luke's hospital with Dr. Erickson.

4 I did not have firsthand knowledge of
5 that experience with Natasha Erickson, if that's
6 what you're asking. No, I did not. I was relying
7 on the story told to me by my daughter and
8 son-in-law, who I trust completely.

9 Q. Okay. Did they -- let me break down
10 the components of this phrase -- or this first
11 sentence. Excuse me.

12 The first part where she says she was
13 the first to call CPS, do you see that?

14 A. Yep. She threatened to call CPS if
15 they were going to leave against AMA, against
16 medical advice. So they decided to stay simply
17 because they were threatened by
18 Dr. Natasha Erickson. And the next day, CPS
19 showed up anyway.

20 Q. So here's my question, sir. I'm just
21 trying to understand.

22 Did Marissa or Levi tell you that
23 Dr. Erickson was the first one to call CPS
24 regarding their child?

25 A. They told me that she was the first one

1 asked before about contributing to the content,
2 did you rely upon any contributions for this --
3 for the content that's stated here, "Cyrus's
4 kidnapping"?

5 A. No. No, I did not rely on anybody
6 other than myself.

7 Q. Okay. And then this language here, I'm
8 scrolling down to the middle of page 1, Exhibit 5,
9 Dr. Erickson, you state she was the first to call
10 CPS simply because Marissa and Levi asked to leave
11 St. Luke's after Cyrus first got his IV and was
12 rehydrated.

13 See that?

14 A. Yep.

15 Q. Did you rely upon any individuals for
16 that fact?

17 A. Yeah, Marissa and Levi told me that.
18 Everything you see right there is exactly what
19 they said. It's exactly what she did to them.

20 Q. Okay. So was -- who, if anyone, did
21 you rely upon for this first part here, where you
22 say she was the first to call CPS?

23 A. What do you mean? I just told you. So
24 everything you see right there, I wrote. But if
25 you're asking where I got the information to write

1 to threaten to call CPS, which she did do. And
2 they stayed out of fear of having CPS called on
3 their child, because anybody who knows CPS, that
4 it is a child trafficking ring and nobody wants to
5 get involved with them. And the next day after
6 threatening, sure enough, the CPS case worker who
7 resides there in St. Luke's hospital came to
8 interview Marissa the day after she threatened
9 them.

10 Q. Okay. So, just so we're clear here, in
11 response to the question who you relied upon for
12 content, if I'm understanding correctly, you're
13 stating Marissa and Levi informed you that --
14 according to you, that they were threatened by
15 Dr. Erickson that she was going to call CPS;
16 correct?

17 A. Not only that. That is correct. But
18 the next day, CPS did come to interview Marissa.

19 Q. Okay. So is it fair to say you don't
20 have any factual basis to state as a fact that
21 Dr. Erickson was the first one to call CPS?

22 A. I have a factual basis based on the
23 testimony of my daughter and son-in-law. So if we
24 are to admit the testimony of trusted individuals
25 as factual, then, yes, I have that factual basis.

<p style="text-align: right;">Page 53</p> <p>1 watch with CPS; correct?</p> <p>2 A. Well, you see that in quotes. And for 3 anyone who has worked with CPS before, you know as 4 soon as CPS gets their eyes on a child, they're 5 now on watch and CPS is now ready to strike to 6 take that child away at first opportunity.</p> <p>7 So that's why "watch" is there in 8 quotation marks. I'm not claiming that that is 9 some type of specific term, but that is what CPS 10 does. And so once CPS has alerted to a child that 11 can come under their purview, then, yeah, that's 12 what gets the whole ball rolling in CPS cases.</p> <p>13 Q. Okay. So you -- but here's my 14 question, sir, that was different than that.</p> <p>15 You're stating here affirmatively, are 16 you not, on your website, that Dr. Erickson put 17 Marissa and Levi on, quote/unquote, "watch" with 18 CPS; correct?</p> <p>19 A. Yes, I am stating that. According to 20 everything I know, everything I wrote there, I 21 believe it wholeheartedly to be true.</p> <p>22 Q. Okay. And, again, I want to separate 23 your belief and what you are asserting that you 24 know versus what you have facts for.</p> <p>25 Isn't it fair to say -- well, and let</p>	<p style="text-align: right;">Page 55</p> <p>1 trigger." Okay. Yeah, I see it. Yes, that is 2 correct.</p> <p>3 Q. So let's back up because we talked over 4 each other and the record might be a little bit 5 unclear. I'm going to bring your attention to the 6 last sentence of the parenthetical under 7 "Dr. Erickson" in Exhibit 5. Okay?</p> <p>8 A. Okay.</p> <p>9 Q. And there's the word "this" there; 10 correct?</p> <p>11 A. Um-hmm.</p> <p>12 Q. Okay. Am I correct in understanding 13 that when -- what you're contending with regard to 14 the use of "this," is you're referring to the 15 factual representation you made that Dr. Erickson 16 was the first to call CPS and that she was the one 17 who put Marissa and Levi on watch with CPS?</p> <p>18 A. Yes, that is correct.</p> <p>19 Q. Okay. And then you go on to write that 20 this was the initial trigger that got everything 21 started; correct?</p> <p>22 A. Correct.</p> <p>23 Q. Is it fair to say that you're 24 representing to your viewerships that Dr. Erickson 25 is the person who started all of the events that</p>
<p style="text-align: right;">Page 54</p> <p>1 me back up.</p> <p>2 I appreciate what you're saying on -- 3 or I hear what you're saying regarding logical 4 deductions and assumptions.</p> <p>5 But just so the record is clear, you do 6 not have any direct evidence from any source, 7 including Levi and Marissa, that indicates that 8 Dr. Erickson put Marissa and Levi on any kind of 9 watch with CPS, do you?</p> <p>10 A. How could I? How could I be the 11 one who -- I'm not the NSA, who taps people's 12 phone lines and can follow their every single move 13 and communication.</p> <p>14 Q. Fair enough. So next question.</p> <p>15 You state "this," and I understand that 16 you're referring to your factual assertion that 17 Dr. Erickson was the first person to call CPS and 18 that Dr. Erickson put Marissa and Levi on watch 19 with CPS.</p> <p>20 That's what you're referring to as 21 "this"; correct?</p> <p>22 A. What do you mean by "this"?</p> <p>23 Q. In the last sentence.</p> <p>24 A. Oh, the very first sentence. I see it 25 there, yeah. Yes. "This was the initial</p>	<p style="text-align: right;">Page 56</p> <p>1 led to the infant being taken into custody by CPS?</p> <p>2 A. So when you just -- the way you just 3 said it right now, no, I disagree with that. I'm 4 not saying she was the one who started all of the 5 events. But I'm saying she got the first event 6 started. She's the one who knocked the snowball 7 off the top of the hill, not necessarily the one 8 who made any subsequent decisions after the fact. 9 But in terms of this entire thing coming under the 10 purview of CPS, yes, absolutely, I am stating that 11 she is the one responsible for getting that ball 12 started or triggering the entire process. Yes, 13 that I am saying.</p> <p>14 Q. And that she is -- because of that, you 15 are identifying her to your followers as somebody 16 responsible for Cyrus's kidnapping?</p> <p>17 A. Yes, correct.</p> <p>18 Q. And you are identifying her to your 19 followers as a participant in a child trafficking 20 ring?</p> <p>21 A. Anybody who is turning children over to 22 CPS --</p> <p>23 Q. Sir --</p> <p>24 A. Anybody who is turning children over to 25 CPS is definitely a part of the child trafficking</p>

1 ring.

2 Q. Mr. Rodriguez, please just respond to
3 the question as it's raised. You are identifying
4 here Miss -- or, excuse me, Dr. Erickson as a
5 participant in a child trafficking ring; correct?

6 A. Correct, because she is turning

7 children over to CPS.

8 Q. Okay. Again, just answer the question
9 as asked. You are --

10 A. I'm answering the question completely.
11 I understand you don't like the answer. But I'm
12 going to answer the question properly and directly
13 as it was stated to me. I answered it. So if you
14 don't like the answer, that's your problem.

15 Q. No, Mr. Rodriguez, it's not my problem.
16 It's your problem because you're going to waste a
17 lot of our time if you don't answer directly.

18 A. I did answer the question directly.

19 Q. Listen again, sir, please.

20 You're writing here that Dr. Erickson
21 is a participant in, your words, a child
22 trafficking ring here in Idaho; is that correct?

23 A. That is correct, like I already stated.

24 Q. All right. Give me a second,

25 Mr. Rodriguez, and I have another article just to

1 Q. Okay. And then you say, "Child
2 trafficker profile, Dr. Natasha Erickson."

3 A. Yep.

4 Q. You see that? And you came up with
5 that content; correct?

6 A. Yes.

7 Q. Okay. So I'm scrolling down the
8 exhibit, and we should be on page 2 of 6.
9 Do you see that?

10 A. Yep.

11 Q. And to back up, does this look to be a
12 true and accurate reflection of content that you
13 posted on the FreedomMan.org website?

14 A. Yes. I mean, it's a little janky
15 because, as you said, with the nature of capturing
16 a screenshot. But that's fine. It is the
17 content, nevertheless.

18 Q. Okay. Fair enough.

19 And, again, I'm on the bottom of what
20 is page 2 of this printout of the screen. And at
21 the top, it says, "Child trafficker profile,
22 Dr. Natasha Erickson."

23 Do you see that?

24 A. Yes.

25 Q. Okay. And for this statement, "Child

1 ask you some questions about so we can -- hold on
2 for just a second, sir.

3 So, Mr. Rodriguez, what we're going to
4 mark as Exhibit 6 to your deposition should be up
5 on the screen.

6 (Exhibit 6 marked.)

7 A. Okay.

8 Q. Do you see -- hopefully, you see some
9 content from the website you control, and it has
10 got some skulls and then pictures of some
11 individuals.

12 Below that, it says "Child trafficker
13 profile, Dr. Natasha Erickson"; correct?

14 A. Yep.

15 Q. Okay. And did you come up with these
16 graphics?

17 A. Yep.

18 Q. Okay. And you're linking Dr. Erickson
19 with these other individuals as participating in a
20 child trafficking ring; correct?

21 A. I'm not necessarily linking them to her
22 or her to them directly as them being like they
23 know one another and conspire. However, I am
24 linking them as all being a part of what I am
25 calling the child trafficking ring in Idaho, yes.

1 trafficker profile," did you rely upon anybody
2 else to contribute to that?

3 A. No, I wrote that.

4 Q. Okay. So if we look over to the side
5 of the picture, you've got Dr. Erickson's name,
6 and you say, "St. Luke's doctor," and you've
7 provided a link to her profile on the St. Luke's
8 website; correct?

9 A. Yep.

10 Q. Okay. And then you write in the
11 parenthetical, "She was the first to treat Marissa
12 and Levi with hostility because Cyrus was
13 unvaccinated and because they asked to leave
14 St. Luke's after Cyrus got his first IV and was
15 rehydrated."

16 Do you see that?

17 A. Yep.

18 Q. Okay. Did you rely upon anybody else
19 to contribute to the support or content of that
20 statement?

21 A. Yes. As you know, I spoke to
22 Marissa Anderson and Levi Anderson, my daughter
23 and son-in-law, who shared their experience with
24 me. And I used their experience to craft this
25 content.

1 Q. Anybody else that you relied on other
2 than Marissa and Levi?

3 A. No.

4 Q. Okay. You then go on in this area, and
5 you state, "She threatened to call CPS if they
6 decided to leave early. So Levi and Marissa
7 stayed under threat."

8 Do you see that?

9 A. I'm sorry, say it again.

10 Q. Do you see this section, sir, that
11 begins here at the top of what is page 3, "Cyrus
12 first got his IV," and it continues --

13 A. Yep.

14 Q. It continues on to the last sentence
15 that is, "This was the initial trigger that got
16 everything started."

17 Do you see that?

18 A. Yes.

19 Q. Okay. Did you rely upon any
20 information, other than Levi and Marissa, relating
21 to that?

22 A. Nope.

23 Q. Okay. And then you provide another
24 link to Dr. Erickson there; correct?

25 A. Yes.

1 After having identified Dr. Erickson as
2 a child trafficker on your website, you posted
3 information from St. Luke's regarding where she
4 works and her phone number; correct?

5 A. I posted her profile from the
6 St. Luke's website, which you are looking at and I
7 am looking at right now at the same time.

8 Q. All right.

9 A. It has her picture. It has where she
10 works. It has the address of the hospital. It
11 has her phone and fax, which I'm assuming are her
12 office. You scroll down, it has her biography,
13 et cetera, et cetera. It is St. Luke's public
14 profile of Dr. Natasha Erickson. So I am posting
15 information that is already public, yes.

16 Q. Okay. Please listen to the entire
17 question. I just want to get a clean answer.

18 After identifying her on the web page
19 as being a child trafficker, you placed on the web
20 page information regarding what Dr. Erickson looks
21 like, where she works, and related work phone
22 numbers for her; correct?

23 A. I posted her public profile from
24 St. Luke's hospital, correct.

25 Q. Immediately below where you called her

1 Q. After having identified her as a child
2 trafficker; correct?

3 A. Correct.

4 Q. Okay. Then you provide some
5 information regarding phone numbers relating to
6 Dr. Erickson after having identified her as a
7 child trafficker; correct?

8 A. What I have there is what I provided,
9 is a screenshot from her page.

10 Q. Sir, please answer my question.

11 A. Well, you asked an inappropriate
12 question. So the question you asked -- and I
13 object to the way you asked the question because
14 it's inappropriate.

15 So if we're looking at the same
16 exhibit, which we should be looking at, yes, I
17 copied and pasted her profile page from
18 St. Luke's. There's a screenshot of it. And that
19 is exactly what I pasted. Whatever the content
20 that is on there, that is the content that comes
21 from St. Luke's hospital. So what I posted was
22 St. Luke's profile of Natasha Erickson.

23 Q. Maybe you didn't hear my question, sir.
24 We might have talked over each other. Here was
25 the question. I'll say it again.

1 a child trafficker; correct?

2 A. That is correct. That is correct.

3 Q. Okay. And then if we continue down the
4 page, after identifying folks as child
5 traffickers, you placed on the website a donation
6 button; correct?

7 A. Well, your screenshot there is messed
8 up. So at the time of baby Cyrus's kidnapping,
9 there was a donate button on the right side of
10 every page. So it wasn't immediately below it.
11 It was to the right, off on what's called the side
12 bar. But, yes.

13 Q. Okay. So I appreciate it. Let me
14 rephrase it with your clarification about how the
15 website was set up.

16 After posting information identifying
17 Dr. Erickson and others as child traffickers, you
18 placed on that same web page a solicitation for
19 donations; correct?

20 A. So, no, I wouldn't say it was just --
21 so the answer to that is yes, but let's clarify it
22 because the donation button to donate to baby
23 Cyrus's cause is on every single page of the baby
24 Cyrus section of that website. So to state it the
25 way you stated it sounds, you know, disingenuous

<p style="text-align: right;">Page 69</p> <p>1 what you're referring to, at least what I'm 2 inferring from the face that you made. 3 Those ads are part of Disqus. So 4 Disqus is the commenting system. 5 Q. I'm going to interrupt you. I'm happy 6 to ask some questions along those lines. It's 7 hard to use your testimony if it's not in 8 conjunction with a question. 9 A. No problem. Anyway, you can ask that 10 question later, then. But now I have the 11 clarification for what the confusion was there. 12 Q. Okay. Let me ask you some questions 13 along those lines, too, so we can maybe clear it 14 up. 15 So, Mr. Rodriguez, after the break, you 16 were sharing that you had gone back on and 17 reviewed the website. 18 And you identified some advertising 19 related to the website when you reviewed it during 20 the break; is that correct? 21 A. That is correct. 22 Q. And you indicated you wanted to explain 23 that as it relates to the question of whether or 24 not there's revenue generated by the website. 25 So you can go ahead and explain that</p>	<p style="text-align: right;">Page 71</p> <p>1 make sure that I'm understanding. 2 Does this modify your prior answer, in 3 that you testified that you receive -- that, 4 excuse me, no one receives any revenue directly 5 associated with ads being placed on the 6 FreedomMan.org website? 7 A. I don't receive any revenue. Nobody 8 associated with me receives any revenue. But does 9 Disqus, as a company, receive revenue? Probably. 10 Q. Okay. Thank you for that 11 clarification. 12 Okay. Let me ask you some questions 13 here relating to Interrogatory No. 4. 14 A. Okay. 15 Q. Can you identify any person who has 16 posted -- any person other than yourself, let's 17 ask it that way, who has posted any content on the 18 FreedomMan.org website? 19 A. Nobody has posted any content other 20 than me. 21 Q. Okay. Any person who has published 22 content on the FreedomMan.org website? 23 A. Like I mentioned before, there are 24 people who I've got permission from them to post 25 their articles on the website. But if that is so,</p>
<p style="text-align: right;">Page 70</p> <p>1 for us, sir. 2 A. Yeah. So there's definitely zero 3 revenue generated by the website, but those ads do 4 appear. And the reason those ads appear is 5 because we use a commenting system called Disqus, 6 spelled D-i-s-q-u-s. And in order to place their 7 software on our website which allows people to 8 post comments, you can either pay for the software 9 or you don't pay for the software. And if you 10 don't pay for the software, they will place ads 11 underneath or in the commenting section that they 12 gain revenue from in exchange for allowing me to 13 use their software for free. 14 Q. Okay. And just off the top of your 15 head, do you have a ballpark what the difference 16 is between paying for the software and not having 17 the ads, versus accepting the software and 18 allowing them to place ads? 19 A. Ballpark, no. It's a couple-hundred 20 bucks. Whatever it is, I'm too cheap to want to 21 pay for it. So, no. Again, I can get you that 22 very specific number. I'll put that on the list, 23 and I will tell you exactly what it would cost me 24 on an annual basis so that the ads don't appear. 25 Q. Okay. And just one last question to</p>	<p style="text-align: right;">Page 72</p> <p>1 they are always noted on there, like this is the 2 author and this is the link to their original 3 content. 4 Q. And let me ask it just so it's tied 5 more to the issues in this lawsuit. 6 Are you aware of any person having 7 their content published that relates to the 8 lawsuit -- the issues that are the subject of the 9 lawsuit with St. Luke's? 10 A. No. 11 Q. Okay. Anyone other than yourself who 12 is authorized or capable of removing content from 13 FreedomMan.org? 14 A. No. There's nobody other than myself. 15 Q. Okay. This is -- let me ask you this 16 question that was Interrogatory No. 5. Some of 17 it, I think, is addressed by your representation 18 that Freedom Man Press is not a legal entity of 19 any kind. 20 A. Correct, it is not. 21 Q. Is it fair to say that for purposes of 22 legal liability which would -- and/or receiving 23 discovery or legal process relating to the 24 FreedomMan.org website, you are the person? 25 A. That is correct.</p>

<p style="text-align: right;">Page 73</p> <p>1 Q. Your identified role relating to 2 Freedom Man Press is -- one of your identified 3 roles is as marketing director. 4 A. Yeah, sure. 5 Q. Can you explain to me what that role 6 is? 7 A. Well, it's just a title. There's not 8 an actual role. Again, Freedom Man Press, if you 9 want to call it Freedom Man Press, if you want to 10 refer to it as an organization, is all me. I 11 could be the marketing director. I could be the 12 janitor. I could be the CEO. I could be the 13 columnist. I could be the webmaster. I could be 14 the email communicator. It doesn't matter. But I 15 am all those things. 16 Now, I am principally the writer. So 17 I'm the guy who writes all of the content. So The 18 communications director is someone who 19 communicates with the public. And so that is why 20 I use that title. 21 Q. And you're also the individual 22 responsible for placing any content that you 23 created on the FreedomMan.org website to other 24 sites? 25 A. To other sites?</p>	<p style="text-align: right;">Page 75</p> <p>1 contact. 2 Q. Okay. Let me ask you this. 3 When it comes to maintaining the 4 evidence relating to content on the website 5 relevant to this litigation, are you the person 6 that controls that, also? 7 A. Yep. 8 Q. Okay. And you understand, right, given 9 the dispute, that the evidence relating to the 10 content of the website and changes needs to be 11 maintained? 12 A. Say it again? You said evidence 13 relating to the website needs to be what? 14 Q. I'll state it again, sir. I assume 15 that you understand that, given the disputes that 16 you've threatened and the lawsuit that we're here 17 for, that you're responsible for maintaining the 18 evidence relating to what was on the website when, 19 what was changed on the website? 20 A. I'm not aware of anything specific. 21 But, yes, all of the -- do I have backups of the 22 website? Do I have historical data? Yes, I do. 23 And so will I maintain all that? Absolutely. 24 Q. And also along those lines, maintain 25 the records of what was changed and when on the</p>
<p style="text-align: right;">Page 74</p> <p>1 Q. Yeah. Placing content that originated 2 from FreedomMan.org as it relates to the dispute 3 with St. Luke's, you're responsible for 4 coordinating the FreedomMan.org content being 5 placed on other websites; correct? 6 A. So I'm not aware of any of our content 7 being placed on any other websites. But if 8 content is placed on any other website that I'm 9 not aware of, either they just placed it there 10 without permission or maybe they did contact me 11 and I don't remember, because that whole period of 12 time when baby Cyrus was kidnapped was quite the 13 blur. 14 But, yes, if somebody did get 15 permission to post content from FreedomMan.org, 16 they only could have got that permission from me. 17 Q. Okay. And to the extent there was any 18 marketing of Freedom Man Press content relating 19 to the issues with CPS -- excuse me, to the issues 20 with CPS or baby Cyrus or St. Luke's, you would 21 have been the point person for that, for Freedom 22 Man Press? 23 A. Correct. If there was any marketing, 24 and I don't remember any, I would have been the 25 point person. I would have been the point of</p>	<p style="text-align: right;">Page 76</p> <p>1 website, in particular as it relates to the issues 2 relating to the infant and St. Luke's? 3 A. So, yes, I have all of that. So the 4 way RapidWeaver works, I'm trying to think through 5 how any change updates would be noted. It's not 6 like a change log, if that's what you're familiar 7 with or if that's what you're referring to. 8 What it is, is they're basically -- I 9 wouldn't know how to explain it to you. They're 10 HTML files that are created. Those files created 11 are in backup files that have historical data. So 12 I can go back and say, okay, on this date, this is 13 what it was, and on this date, that's what it was. 14 And so I will maintain all that. 15 But if you're referring to change logs, 16 which is something that many people are familiar 17 with who are using database-driven websites, that 18 doesn't exist. So that doesn't exist with this 19 type of website because it's not database-driven. 20 It's pure HTML. 21 Q. Okay. All right. Let me take just a 22 moment, Mr. Rodriguez. I'm going to just put you 23 on mute for a second to take a quick look at my 24 notes. But I think we're -- if we're not done, 25 we're very close to it.</p>

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<p>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</p>	<p>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</p>
Page 78	Page 80
<p>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</p>	<p>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 --oo-- 23 24 25</p>

ST. LUKE'S HEALTH SYSTEM vs AMMON BUNDY

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

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 expires24
25

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

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 24th 2022.21 Tiffany Fisher, Court Reporter
CSR No. 97922
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

EXHIBIT E



Insider Information from a Whistleblower!

Baby Cyrus Menu/Navigation

[BABY CYRUS HOMEPAGE \(../../cyrus/\)](#)

[HOW YOU CAN HELP \(../../cyrus/how-you-can-help/\)](#)

[VIDEOS \(../../cyrus/videos/\)](#)

[PRESS CONFERENCES \(../../cyrus/press-conferences/\)](#)

[TIMELINE \(../../cyrus/timeline/\)](#)

[ORIGINAL STORY OF WHAT HAPPENED \(../../cyrus/archive/original-story/\)](#)

[PICTURES OF BABY CYRUS \(../../cyrus/pictures/\)](#)

[LAWS THAT WERE BROKEN \(../../cyrus/laws-that-were-broken/\)](#)

[P.A.C.T. RALLY \(../../cyrus/pact-rally/\)](#)

[WHERE BABY CYRUS GOT HIS NAME \(../../cyrus/how-did-baby-cyrus-get-his-name/\)](#)

[INTERVIEWS AND MEDIA \(../../cyrus/interviews-and-media/\)](#)

[THE KIDNAPPERS \(../../cyrus/kidnappers/\)](#)

[LIES PEOPLE HAVE TOLD \(../../cyrus/lies/\)](#)

[CHILD TRAFFICKING RESOURCES \(../../cyrus/resources/\)](#)

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JUDGE LAURIE FORTIER (coming soon)

Insider Information from a Whistleblower!

April 29th | by Diego Rodriguez

I have some amazing, yet horrifying news! Ever since we posted our new secure email, freedommanpress@protonmail.com for [whistleblowers \(../../cyrus/archive/be-a-whistleblower-be-a-hero/\)](#) to send us evidence and information about corruption in government—we have been receiving near daily responses from anonymous people wanting to share private information with us.

And now I have just received private information about Baby Cyrus's case from an anonymous whistleblower who apparently wants me to publish it—as you can assume from the email I received (screenshot below):

insider info

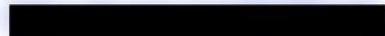
From [REDACTED]

Yesterday

To freedommanpress@protonmail.com



i am on the inside with local idaho government. i have access to all the documents in baby cyrus case. below is the link to get the information you dont have access to. this information will be deleted within 48 hours:



Sent with [ProtonMail](#) secure email.

I have downloaded the files which included never before seen bodycam footage from Meridian police and also the court documents that describe the case against Marissa and Levi which they are gag-ordered against speaking about publicly. Most specifically, I now have copies of the affidavit filed by CPS against Marissa and Levi, and also Judge Laurie Fortier's order/sentencing against them!

What I can tell you so far is that the affidavit is LOADED WITH LIES!!! It is just one lie after another, and it is all hearsay. But the most egregious part is that there is now documented evidence that CPS and Judge Laurie Fortier clearly violated the law! It is all there in black and white!

More specifically, they violated [This is a very egregious violation of Idaho law and it demonstrates that they are either totally incompetent or blatantly disregarding the law because they can get away with it! Remember, they were not legally allowed to take or keep Baby Cyrus away from Marissa and Levi without making these “reasonable efforts.” But as I will show you next week when I publish everything—they blatantly disregarded and violated this law!](https://legislature.idaho.gov/statutesrules/idstat>Title 16/Title 16/Section 16-1610, which requires that <i>“reasonable efforts be made prior to the placement of the child in care to prevent the removal of the child from his home.”</i> The law requires that CPS demonstrate PROOF that they have made these “reasonable efforts” and BOTH the affidavit and the order from Judge Laurie Fortier demonstrate that this was never done!</p></div><div data-bbox=)

There are other parts of the documentation that I need to get legal counsel about before I publish everything, but let me just warn you—if you weren’t already righteously indignant over what has gone on in the Baby Cyrus case—you’re going to ABSOLUTELY FURIOUS when you see what they have been hiding and how they have blatantly broken the law! This is not a matter of opinion—it’s a matter of empirical fact and I have the evidence to show you! Get ready because you’re not going to believe it!

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Name



Dana Clemeaux • 7 hours ago

Thank God there is an occasional person out there that still has a sense of right and wrong with courage to do something about the wrong when they see it!

[^](#) [▼](#) [• Reply](#) [• Share](#) [,](#)



Lynnette Mima • 3 days ago

YES!! YES!! NOW you're talking! The Reasonable Efforts clause under Title IV-E under the Social Security Act is ALWAYS violated, especially in cases where there is no actual abuse. Always. But most folks, including most attorneys (which is shameful) NEVER look there, let alone act on it. Diego!! Praise the Lord! You are an answer to many years of prayers! For so long I've been "preaching" this stuff, all to no avail. Finally someone gets it and is acting on it! Oxo Formal complaints need to be made at the county, state and federal levels. I would include sending a complaint to the Government Accountability Office (GAO). They actually responded to a similar complaint I sent to them many years ago. Be careful though. They are all gov agencies, so you must spell it out for them like a "Dick & Jane" story and attach all evidence ;) The child services agency and hospital (and whatever other services orgs they contract) can also be sued under the False Claims Act, using the Reasonable Efforts violation to get the ball rolling. *happy dance* You are amazing. Thank you so much for sharing!

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Lynnette Mima → Lynnette Mima • 3 days ago

btw... Did you see the news about Jason "Storm" Nelson from TX? Stew Peters interviewed him a few days ago. He and his family have been attacked by the child services machine. Their brand new daughter is being held hostage at Baylor Scott & White Medical Center in Waco TX. 254-202-2000. Folks, please reach out and help. That dad (Jason) and his wife are hanging on by a thread.

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Isaiah 44:28 "That saith of Cyrus, He is my shepherd, and shall perform all my pleasure."

Isaiah 45:1-3 "Thus saith the LORD to his anointed, to Cyrus, whose right hand I have holden, to subdue nations before him; and I will loose the loins of kings...I will go before thee, and make the crooked places straight...that thou mayest know that I, the LORD, which call thee by thy name, am the God of Israel."

ADDRESS:

9169 W State St. Suite 3177

Boise, ID 83714

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EXHIBIT F

From: Erik Stidham
Sent: Friday, October 28, 2022 10:03 AM
To: Freedom Man Press <freedommanpress@protonmail.com>
Subject: St. Luke's v. Bundy-Letter requesting information identified in deposition

Mr. Rodriguez,

See attached.

Erik Stidham

(he/him)

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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October 28, 2022

VIA EMAIL AND US MAIL

Diego Rodriguez
1317 Edgewater Drive, #5077
Orlando, FL 32804
freedommanpress@protonmail.com

**Re: St. Luke's Health System, Ltd, et al. v. Ammon Bundy, et al.;
District Court of the Fourth Judicial District of Idaho, County of Ada
Case No. CV01-22-06789**

Dear Mr. Rodriguez:

I am following up from your deposition on October 5, 2022. During your deposition, you agreed to provide certain information that you either could not remember or could not state with certainty. Please provide documents to address the following issues for which you agreed to provide additional information:

- Please identify the host for the Freedom Man website – at your deposition you indicated it could be Blue Host or GoDaddy.
- Please identify when you first began using the State Street address in Boise for Freedom Man Press and freedomman.org as well as the date you discontinued using that address.
- Please identify the steps you took to formally close Freedom Man PAC.
- Please provide information regarding the Disqus commenting system you use on the Freedom Man website, including whether you pay for the service and the cost of the service.
- Please provide HTML backup files or other historical copies of the Freedom Man website to show the changes in content over time.

If you have any questions regarding these requests, please let me know.

Very truly yours,



Erik F. Stidham
Partner
of Holland & Hart LLP

EFS:mea

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