UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF FLORIDA
GAINESVILLE DIVISION
Case No.: 1:25-cv-00058-RH-MJF

ELEPHANT SHOE, LLC, an Ohio Limited Liability Company d/b/a WHAT THE HALE$, and JEREMY B. HALES,

Plaintiffs,

v.

LYNETTE MICHELLE LACY ALEXIS PRESTON JOHN COOK, BRUCE P. MATZKIN, LISA WEEKS a/k/a LISA LEE a/k/a LISA RAPUZZI a/k/a LISA LEE RAPUZZI a/k/a LISA RAPUZZI WEEKS, MARLA HUGHES, DAVID C. HELM, ROBERT J. KESZEY, DAVID MICHAEL TESCHENDORF, JOHN DOE, a/k/a/ "RAY BONECRUSHER @raybonecrusher4516," and RICHARD LUTHMANN,

Defendants.
_____/

AMENDED COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF

Plaintiff ELEPHANT SHOE, LLC, an Ohio Limited Liability Company d/b/a WHAT THE HALE$, (hereinafter, "HALES") and Plaintiff JEREMY B. HALES ("Mr. HALES"), by and through undersigned counsel, bring this complaint against Defendants LYNETTE MICHELLE LACEY ALEXIS PRESTON (hereinafter, "PRESTON"), JOHN COOK (hereinafter, "COOK"), BRUCE P. MATZKIN (hereinafter, "MATZKIN"), and LISA WEEKS a/k/a LISA LEE a/k/a LISA RAPUZZI a/k/a LISA LEE RAPUZZI a/k/a LISA RAPUZZI WEEKS, (hereinafter, "WEEKS"), MARLA HUGHES (hereinafter, "HUGHES"), DAVID C. HELM (hereinafter, "HELM"), ROBERT J. KESZEY (hereinafter, "KESZEY"), DAVID MICHAEL

TESCHENDORF (hereinafter, "TESCHENDORF"), JOHN DOE, a/k/a/ "RAY BONECRUSHER @raybonecrusher4516 (hereinafter, "RAYMOND,") and RICHARD LUTHMANN (hereinafter, "LUTHMANN") (collectively, "Defendants"), and state:

INTRODUCTION

1. HALES is a social media influencer who uses several online business platforms to generate revenue, including, without limitation, YouTube, Facebook, TikTok, and Instagram.

2. YouTube's main source of revenue is advertising, which enables businesses to find relevant audiences and grow their businesses and brands via unique YouTube Channel platforms for a business. Creators who are part of the YouTube Partner Program (YPP) are eligible to share in advertising revenue. HALES is part of the YPP with a current YouTube subscription fan base of over 730,000 people across the world for the YouTube channel "What The Hale$."

3. Businesses who maintain a YouTube platform can complement their brand with Facebook business pages which primarily function as a marketing platform for businesses, enabling them to connect with customers and promote their offerings. Facebook business pages are public profiles that allow businesses to share information, engage with users, and run targeted ad campaigns. HALES has a Facebook business page called "What The Hale$" with over 327,000 followers – see https://www.facebook.com/whatthehales/.

4. TikTok creators also make money on TikTok. The most successful TikTok creators make money through a combination of revenue streams that can include sponsorships, fundraising drives, product sales, and accepting tips. TikTok users can also promote products through an affiliate link to get paid directly from brands. HALES is also a TikTok creator.

5. People who subscribe with Plaintiff's social media platforms often pay monthly fees to HALES for *premium* access to HALES' social media platform - which is an "open video diary" of HALES' life. HALES' social media platforms are where people are EDUCATED, EQUIPPED and ENCOURAGED (with a dash of humor on the Side). HALES has expended and continues to expend substantial time, money, and resources into acquiring subscribers, providing ongoing programs, and maintaining relationships and goodwill with them.

6. HALES also sells - via online Whatnot auctions - items it acquires during its Storage Unit hunts:

https://www.whatnot.com/user/whatthehales?srsltid=AfmBOooils4LM5EIfvO_uCx040J2zkVnmsX45Q8fFX6PldGrvASdPz4r

PARTIES

7. Plaintiff ELEPHANT SHOE, LLC ("HALES") is an Ohio Limited Liability Company with its principal place of business in Summit County, Ohio.

8. Plaintiff's owner-agent is Plaintiff Jeremy B. Hales (hereinafter, "Mr. HALES") is an individual domiciled in Peninsula, Summit County, Ohio and is a citizen of Ohio.

9. Defendant PRESTON is an individual domiciled in Otter Creek, Levy County, Florida and is a citizen of Florida.

10. Defendant COOK is an individual domiciled in Otter Creek, Levy County, Florida and is a citizen of Florida.

11. Defendant MATZKIN is an individual who is licensed to practice law in Massachusetts and Connecticut and, upon information and belief, is a citizen of Massachusetts.

12. Defendant WEEKS is an individual domiciled in The Villages, Sumter County, Florida and is a citizen of Florida.

13. Defendant HUGHES is an individual domiciled in Bronson, Levy County, Florida and is a citizen of Florida.

14. Defendant HELM is an individual who is licensed to practice law in Michigan and, upon information and belief, is a citizen of Michigan.

15. Defendant KESZEY is an individual domiciled in Bushnell, Sumter County, Florida and is a citizen of Florida.

16. Defendant TESCHENDORF is an individual domiciled in Milwaukee, Milwaukee County, Wisconsin and is a citizen of Wisconsin.

17. Defendant RAYMOND is a United States citizen, *not* a resident of Ohio (upon information and belief).

18. Defendant LUTHMANN is an individual domiciled in Staten Island, Richmond County, New York and is a citizen of New York.

JURISDICTION AND VENUE

19. Jurisdiction is proper in this Court pursuant to 28 U.S.C. § 1332 as there is complete diversity of citizenship between both Plaintiffs and all Defendants in this matter and the amount in controversy, exclusive of interest and costs, exceeds the sum of $75,000.

20. Additionally, this Court has subject matter jurisdiction under 28 U.S.C. §1331, as a federal question is presented under the Lanham Act, 15 U.S.C. § 1125(a).

21. This Court has personal jurisdiction over all Defendants because this action arises out of and is related to Defendants' purposeful contacts with the State of Florida, and this Court's exercise of personal jurisdiction over Defendants would not violate traditional notions of fair play and substantial justice.

22. Venue is proper in this Court pursuant to 28 U.S.C. § 1391(b).

GENERAL ALLEGATIONS

A. HALES BUSINESS INTERESTS

23. In addition to maintain social media platforms for business revenue, HALES has recently needed to supplement business revenue as a result of lost profits since the fall of 2023 - due to Defendants' actions. HALES now has two Airbnb

beachfront condominiums for its customers to use in Cedar Key, Florida, consistent with the HALES business model to maintaining relationships and goodwill with subscribers and fans. HALES has maintained social media platforms for business revenue since 2017.

B. WEEKS' SCHEME

24. WEEKS is a competitor of HALES for Internet Sales and Marketing, as a host and/or operator of a YouTube channel called "Two Lee's In A Pod" (and other social media platforms, including, without limitation, Instagram, Twitch, Discord, TikTok, and via *Whatnot Auctions*) with a current YouTube subscription fan base of over 3,000 people. People who subscribe with WEEKS' social media platforms often pay monthly fees to WEEKS for *premium* access to WEEKS' social media platform - WEEKS has expended and continues to expend substantial time, money, and resources into acquiring subscribers, providing ongoing programs, and maintaining relationships and goodwill with them. WEEKS accepts an seeks online "tips and donations" from her online viewers – see streamlabs.com/sl_id_93663f55-2add-3853-b6a5-1eccf5b98b5f/tip.

25. WEEKS was chosen by PRESTON to be PRESTON's "podcast" or "PR person" as part of the Anti [What The Hales] Media Ecosystem – the Malicious Conspiracy To Harm Hales.

26. WEEKS was a former volunteer "moderator" for HALES' YouTube livestreams. After resigning as a HALES moderator, and since June 2024 to date,

WEEKS is using her online advertising YouTube platforms to make false or misleading statements of fact that damage HALES' reputation and sales – by mainly targeting HALES' owner/agent - Mr. HALES. These statements targeting HALES and Mr. HALES are likely to deceive or have actually deceived consumers, and likely to influence a consumer's purchasing decision or other commercial behavior against HALES. The disparaging statements made by WEEKS are about HALES' businesses which are untrue.

27. WEEKS scheme includes attacking HALES and Mr. HALES with false statements about HALES' business reputation via her YouTube channel, in order to destroy HALES' business model and income, at the same time specifically and falsely claiming that HALES is destroying the life of Ms. PRESTON (and her child) and of Mr. Cook.

28. WEEKS also refers to HALES and/or Mr. HALES as "GERM" or "Jeremy."

29. WEEKS - as part of the Malicious Conspiracy To Harm Hales - made the following false statements on YouTube on 10/6/24:

- "[T]hat's the bottom line right there yeah ladies and gents all this that's gone on every last bit of [False Signs about Jeremy Hales] were created for content harassing (sic) destroying someone's life."

- "Jeremy Hales tortured [PRESTON] for content for a year and a half he almost had her child taken away from her or tried to he did all this crap when the damn story would have been Otter Creek he could have just stuck with that but he took advantage of someone whom he thought was weak and he did it all himself"
- "Jeremy Hales wrote [the signs that stated he raped a minor child] and committed forgery in doing so."

30. ***Since 8/4/2024 WEEKS has made more than ONE HUNDRED YouTube video publications*** on her YouTube channel – targeting HALES and Mr. HALES - which are (1) part of the Malicious Conspiracy To Harm Hales and (2) replete with further false statements about Mr. Hales. Some of the URL of WEEKS's ***false YouTube video publications*** are:

- https://www.youtube.com/watch?v=DF5wEk7Yqv0&t=4s
- https://www.youtube.com/watch?v=4xxc22xwM5g
- https://www.youtube.com/watch?v=Sd-2_mrVsUM
- https://www.youtube.com/watch?v=lUQmgdp-Zdo
- https://www.youtube.com/watch?v=05PgxTkaMrw
- https://www.youtube.com/watch?v=m5pyIpTNoeY
- https://www.youtube.com/watch?v=i9MeOkAv2FM
- https://www.youtube.com/watch?v=Ivf5uBM7-0M

- https://www.youtube.com/watch?v=b3qmavcIbI8
- https://www.youtube.com/watch?v=PGhjM92dHYM
- https://www.youtube.com/watch?v=lvK8cK9VKnE
- https://www.youtube.com/watch?v=Pcs7ZG6McYI
- https://www.youtube.com/watch?v=qsq7f78rNvs
- https://www.youtube.com/watch?v=T9Cq1F_H0d4
- https://www.youtube.com/watch?v=88cvhZiUSpU
- https://www.youtube.com/watch?v=TV92pIvK2xs
- https://www.youtube.com/watch?v=7A2HmhyDykU
- https://www.youtube.com/watch?v=H8rjfKtVfa4
- https://www.youtube.com/watch?v=RDHHO3FRmKE
- https://www.youtube.com/watch?v=JGMgQ8Qj3qU
- https://www.youtube.com/watch?v=F2hm8fzar7c
- https://www.youtube.com/watch?v=iSURVRiuZl4
- https://www.youtube.com/watch?v=R7gbNCmiro4
- https://www.youtube.com/watch?v=TB65_CeDE4o
- https://www.youtube.com/watch?v=et2Tj42M0ws
- https://www.youtube.com/watch?v=UYOxk_ysH68
- https://www.youtube.com/watch?v=zxk3VXoZJp4
- https://www.youtube.com/watch?v=5fYAoPDVYMY

- https://www.youtube.com/watch?v=5fYAoPDVYMY
- https://www.youtube.com/watch?v=_n4AuiC7PiU
- https://www.youtube.com/watch?v=jF5ExO16m9Q
- https://www.youtube.com/watch?v=9-uEeLwVIi4
- https://www.youtube.com/watch?v=vqYlL2322Gs
- https://www.youtube.com/watch?v=gfZs_n0e70I
- https://www.youtube.com/watch?v=WgJfhvIaPPo
- https://www.youtube.com/watch?v=zQ6z6mIk31o
- https://www.youtube.com/watch?v=gVDfLOyUJG0
- https://www.youtube.com/watch?v=baOG8-rlzRw
- https://www.youtube.com/watch?v=vy9WJFxOZc4
- https://www.youtube.com/watch?v=r_-3ChVUWxI
- https://www.youtube.com/watch?v=6wvwUTOSk5M
- https://www.youtube.com/watch?v=G_-QGZmfVUA
- https://www.youtube.com/watch?v=MRp4mmqX8D4
- https://www.youtube.com/watch?v=7zy4U4m_54E
- https://www.youtube.com/watch?v=pVFV0nUKd_c
- https://www.youtube.com/watch?v=tjJAxAX4UEI&t=2524s
- https://www.youtube.com/watch?v=t4jcQw3xa-Q
- https://www.youtube.com/watch?v=Q4wMnbuqguI

- https://www.youtube.com/watch?v=dl80XrKfXjA
- https://www.youtube.com/watch?v=PWC9i---TII
- https://www.youtube.com/watch?v=PZFS2VvJS-c
- https://www.youtube.com/watch?v=qOvdq8WnDOg
- https://www.youtube.com/watch?v=O6g76M6JQtc
- https://www.youtube.com/watch?v=qsgh8niKRkw
- https://www.youtube.com/watch?v=mRv3rgyFvGc
- https://www.youtube.com/watch?v=_ZomQ7ISn3A
- https://www.youtube.com/watch?v=IQEWJuijbb4
- https://www.youtube.com/watch?v=Wcd1JwdQWtg
- https://www.youtube.com/watch?v=RdBviN1ibfI
- https://www.youtube.com/watch?v=UdBfq-QnyEA
- https://www.youtube.com/watch?v=BqQKSJ5NuQM
- https://www.youtube.com/watch?v=hT05sZ6JnFA
- https://www.youtube.com/watch?v=dYouFi4HRHg
- https://www.youtube.com/watch?v=S6GZLmFJvck
- https://www.youtube.com/watch?v=hlAmIA3pwg4
- https://www.youtube.com/watch?v=8vkr7FXtvBs
- https://www.youtube.com/watch?v=CTfn47XyFjg
- https://www.youtube.com/watch?v=Z1ekGbPOLiQ

- https://www.youtube.com/watch?v=2wICGsvxsB4
- https://www.youtube.com/watch?v=wrCZr13bP18
- https://www.youtube.com/watch?v=li94KVylIq8
- https://www.youtube.com/watch?v=U7ZbaXPcRHw
- https://www.youtube.com/watch?v=zEhhVq0enMM
- https://www.youtube.com/watch?v=BBUBMEUhOzU
- https://www.youtube.com/watch?v=SYb_aVcXW6g
- https://www.youtube.com/watch?v=p07Vg_CByi0
- https://www.youtube.com/watch?v=r9vvwpjFAsk
- https://www.youtube.com/watch?v=VQvAeT4kwao
- https://www.youtube.com/watch?v=3PT7S1QTm20
- https://www.youtube.com/watch?v=wsGAnlrMsU0
- https://www.youtube.com/watch?v=VMmW38w0ruQ
- https://www.youtube.com/watch?v=FyHv-uEDWkI
- https://www.youtube.com/watch?v=5KJdqi7fW2c
- https://www.youtube.com/watch?v=Ig-0F7_RENs
- https://www.youtube.com/watch?v=hU6s0Jmorrg
- https://www.youtube.com/watch?v=xgfYuTIEkyg
- https://www.youtube.com/watch?v=liEDRtJ5fuM
- https://www.youtube.com/watch?v=6IM2Zo0yR3k&t=1s

- https://www.youtube.com/watch?v=yFAepu7pxdA
- https://www.youtube.com/watch?v=Go--QZLSc1g

31. On 8-4-2024 WEEKS said – referring to Mr. HALES:

- "that is the person Jeremy is he's Shady he's underhanded um he will you know he uses people."
- "he's obsessed with men's penises"
- "he's always talking about people's penises"
- "I'm so tired this guy getting away with ripping people off he's stealing money from people that really can't afford to be sending him the things they're just nice kindhearted people um he's scamming them out of their money yeah he's totally scamming them out of their money man and it's sad it's really sad and just watching him come up with all this fake content"
- "Jeremy said to George something along the lines like see how easy it is to get money from them you just ask and they're so stupid they'll send you money."
- "anytime you see uh what you think is Jeremy's heart showing not that guy is Stone Cold all he cares about is greed attention and himself he doesn't even care about George he doesn't even care about his own freaking children which you mentioning a lot lately but he doesn't even have a relationship with any of them and he makes people think he does - he doesn't." and
- "Jeremy is an F bomber constantly and you would never know that that's cuz he cuts it out of his videos"

32. From a deleted WEEKS livestream called "LIVE: IT's BLINDSIDED SUNDAY EVERYONE!!! #BLINDSIDED @what the hales": WEEKS said: "Germ

used these handwriting uh whatever the whatever this handwriting is on these um signs to harass ridicule mock Destroy This Woman (Ms. PRESTON]'s life for over a year and a half."

33. On 8-22-2024, WEEKS posted the following on her YouTube platform: "GERM EMBEZZELED $ FROM A CHURCH."

34. On 8-24-2024, WEEKS stated the following on her YouTube platform:

> "now (Ms. PRESTON] has a voice there's a platform for her um and we're showing that side of it we've been seeking the truth we've been asking people to send us information that would back either side and in the past two weeks that we've actually been doing this hardcore on online live with you guys um the only stuff that we've been receiving is against Jeremy it doesn't put him in um any good light at all it's actually very negative there's no proof pretty dark very dark."

35. On 10-28-2024, WEEKS posted the following on her YouTube platform: "JOHN COOK GETS STALKED BY GERM."

36. On 10-29-2024, WEEKS posted the following on her YouTube platform: "GERM KEEPS STALKING [MS. PRESTON]'S PROPERTY DAILY."

37. On 11-26-2024, WEEKS posted the following on her YouTube platform: "GERM THE STALKER."

38. On12-10-2024, WEEKS posted the following on her YouTube platform: "GERM STILL STALKING."

39. On 12-29-2024, WEEKS posted the following on her YouTube platform: "GERM STALKS & DEFAMES THE SECOND HE RETURNS TO FL!"

40. On 1-2-2025, WEEKS posted the following on her YouTube platform: "GERM STALKING DAILY: PROOF OF HIS LIES."

41. On 1-19-2025, WEEKS posted the following on her YouTube platform: "GERM STALKS THE CHILD ALL DAY."

42. On 1-26-2025, WEEKS posted the following on her YouTube platform: "GERM LOSES IT AT LOCAL WALMART."

43. On 2-10-2025, WEEKS posted the following on her YouTube platform: "GERM GRIFTS OFF ELDERLY DAILY."

44. On 3-2-2025, WEEKS posted the following on her YouTube platform: "GERM CONTINUES TO DEFAME. DON'T CARE WHOSE LIFE HE DESTROYS."

45. On 3-6-2025, WEEKS posted the following on her YouTube platform: "GERM CONTINUES TO DEFAME WHILE BEGGING FOR EVIDENCE. VICIOUSLY ATTACKS ALL HIS CRITICS & FALSELY CREATES CRIMES."

46. On 3-15-2025, WEEKS posted the following on her YouTube platform: "GERM LIES TO POLICE."

47. On 3-16-2025, WEEKS posted the following on her YouTube platform: "GERM ATTACKS [LEVY COUNTY SHERIFF OFFICER]. THREATS TO SUE MORE NEIGHBORS. DEFAMES LAWYER WITH LIES."

48. On 3-20-2025, WEEKS posted the following on her YouTube platform: "GETTING CAUGHT ON TAPE. FAKING VIOLATIONS OF PO. CREATING

INCIDENTS. LYING TO POLICE OFFICERS. COMMITTING PERJURY. STALKING NEIGHBORS, ETC. ETC. ETC." See Thumbnails attached hereto as **Exhibit "1."**

49. In a recent publication, WEEKS stated she has received information about the deposition in this lawsuit of Mr. HALES – this information was supplied to her by MATZKIN. [1]

50. WEEKS solicits cash from consumers who watch WEEKS' programming and misleads them to believe these donations are for charitable purposes (i.e., for PRESTON's child; to construct a home on PRESTON's property, etc.).

51. The soliciting of donations for this purpose from consumers who watch WEEKS has been quite effective, WEEKS has been able to raise at least $70,000 since August 2024, under the above false pretense. These are false pretenses because WEEKS has kept the great bulk of this money for herself and for her own personal use.

52. WEEKS fails to account for where the money raised by these consumers has been spent. In fact, on April 6, 2025, WEEKS said:

> [W]hat I was doing - it wasn't a fundraiser - it was it was not donations ***because it was given to me to help me*** it's not a donation it may have been called a donation or something or because that's what people actually you know think if they're doing something it's a donation.

[1] https://www.youtube.com/watch?v=yFAepu7pxdA

53. In actuality, WEEKS' process and strategy (WEEKS' scheme") is nothing more than a scheme to enrich herself at the expense of consumers and HALES.

54. All the other Defendants have appeared on WEEKS' online platform channel as part of WEEK's scheme between June, 2024 to date – at least once.

55. Collectively, all Defendants are engaged in WEEKS' scheme, targeting HALES and Mr. HALES.

C. PRESTON'S ACTS AND PRESTON'S FURTHERANCE OF WEEKS' SCHEME

56. PRESTON, at all times prior to 2020 and to date, is a viewer of HALES.

57. On or about May 18, 2020, PRESTON started her own YouTube channel.

58. In December 2020, PRESTON learned through watching "What The Hale$" that HALES purchased land for part-time operations of his social media platforms in Otter Creek, Florida.

59. PRESTON saw this as a "golden opportunity" in order to take advantage of HALES's generosity - demonstrated through its social media platforms.

60. Accordingly, PRESTON came up with an idea about how she will get money from HALES, and that idea was to move her residence to be as close to HALES as possible in Otter Creek, Florida.

61. In 2020, PRESTON and COOK resided together in North Port, Sarasota County, Florida. where they created multiple local Sarasota County Facebook pages,

asking for donations to PRESTON's 501(c)(3) "It's a Shell Thing" – a purported "tortoise rescue" not even open to the public.

62. On or about July 17, 2021, PRESTON drove from North Port, Florida to a vacant lot across the street from HALES' property in Levy County Florida (hereinafter, the "VACANT LOT ACROSS THE ROAD"), taking a "fan picture" with Jamie Starr Johnson by the entrance to HALES' property where HALES' "drive-thru sign" was publicly known to be located. Posting this "fan picture" to her social media, PRESTON *falsely* stated (1) she had bought the VACANT LOT ACROSS THE ROAD, and (2) that Mr. HALES was now her "new neighbor." See **Exhibit "2."**

63. On the same July 2021 visit, PRESTON told HALES she was a "super fan" of HALES and asked Mr. HALES if he could help remove a tree from the VACANT LOT ACROSS THE ROAD (which she did not even own in July 2021), and Mr. HALES, not knowing that PRESTON was lying and believing her lies that she was the owner of the VACANT LOT ACROSS THE ROAD (which she did not even own in July 2021), personally used his tractor to move the tree from the VACANT LOT ACROSS THE ROAD (which she did not even own in July 2021).

64. On or about July 21, 2021, PRESTON and COOK listed their North Port, Florida house for sale.

65. On or about October 8, 2021, PRESTON and COOK bought the same vacant lot across the street from HALES' property in Levy County Florida, that she visited in July, 2021.

66. On or about October 27, 2021, PRESTON and COOK sold their North Port, Florida house.

67. Between December 2021 and February 2023 both PRESTON created multiple local Levy County Facebook pages, asking for donations to PRESTON's 501(c)(3) "It's a Shell Thing" – a purported "tortoise rescue" not even open to the public.

68. Between December 2021 and February 2023 PRESTON made it clear to HALES that she was a fan of HALES, and PRESTON would on occasion ask Mr. HALES for "free merchandise," stating that she needed money to pay her bills.

69. On or about February 12, 2023 Mr. HALES relented to the constant requests from PRESTON and gave PRESTON two Leap Pads.[2]

70. On or about February 15, 2023, PRESTON asked Mr. HALES if she could attend for free a paid "meet and greet" live event that HALES was having in Levy County Florida - with many of HALES' fans and supporters visiting on site from around the world.

71. Mr. HALES said yes.

---

[2] Leap Pads are kid-friendly tablets that include preloaded content featuring core skills in mathematics, reading and science as well as music, puzzles, logic and creativity to prepare kids for preschool and beyond.

72. On or about February 20, 2023, PRESTON asked Mr. HALES if she could bring her own Donation Box for the fans of HALES to the paid "meet and greet" live event.

73. Mr. HALES said no.

74. On or about May 1, 2023, Mr. HALES went to Ohio with the intention to remain there until the fall of 2023, only returning occasionally for town hall meetings, which occur monthly.

75. Being denied further access to pecuniary advantages she would have if permitted to solicit donations from HALES' fanbase, PRESTON maliciously began doing injury to HALES' reputation.

76. PRESTON began publishing false statements about HALES and Mr. HALES on her various social media platforms, beginning between the months of May – September, 2023, stating to Mr. Hales:

- "MY PRINCESS (HER CHILD) IS NONE OF YOUR DAMN CONSERN (SIC) WHY ARE YOU OBSESSED WITH HER AND HER DIAPERS AND POTTY HABITS YOU DAMN PERVERTED JERK!"
- "Shame on you, Jeremy. John is not a sex, offender or pedophile, BUT I FIND IT FUNNY YOU HANG OUT WITH MEN THAT ARE AND YOU YOURSELF ARE DISGUSTING TOWARDS CHILDREN MAINLY FOCUSING ON LITTLE GIRLS CROTCHES."

77. After Mr. HALES left Florida to go back to Ohio in May 2023, PRESTON wrote many double sided road signs and placed them around the roads surrounding HALES' property in Levy County, Florida; these signs falsely stated:

- ***Jeremy Hales Raped my Daughter!***
- ***Jeremy Hales Has to Go! What the Hales?***
- ***Jeremy Hales OHIO Rapist***
- ***NO OHIO Rapists in Levy County – Stop Jeremy Hales***
- ***Jeremy Hales Needs to Go! No Child rapists in Levy Co!***
- ***Stop Jeremy Hales No Rapists in Levy Co!***[3]

78. Accordingly, on or about May 23, 2023, HALES hired an attorney who sent a "cease and desist" letter to PRESTON and COOK, which stated, *inter alia*,

> [Y]our unlawful defamatory statements directed to Jeremy Hales on social media platforms constitutes libel under Florida Law. CEASE AND DESIST PUBLISHING ALL DEFAMATORY STATEMENTS… It has come to our attention that you posted defamatory statements regarding Jeremy Hales on various web pages including, but not limited to, Otter Creek friends and neighbors, Otter Creek politics, The Heart of Otter Creek, It's a Shell Thing Inc., as well as other social media platforms…We demand that you immediately (A) cease and desist your unlawful defamation of Mr. Jeremy Hales, Martha, George, What the Hales, and all other variations (including all misspellings and euphemisms such as the youtubers, neighbors, etc.), (B) immediately remove and delete all postings relating to Mr. Hales and his interests, and

[3] In July, 2023, PRESTON posted on her social media that "John posted the signs, not me."

> (C) that you provide us with written assurance within ten (10) days that you will cease and desist from further libel directed to our clients.

79. On or about May 28, 2023, PRESTON posted on her social media that (1) "I'm gonna stand tall and not let Jeremy Hales hurt me ever again;" (2) I will "put a cap" in the ass of anyone who messes with her; and (3) "I'm done with it you met your match Mr. Hales."

80. Despite knowing the falsity of her statements, PRESTON used her false statements (1) to persuade others to help them in a public campaign to disparage HALES in order to negatively affect HALES' income by persuading anyone who has a business relationship with HALES and Mr. HALES to stop their relationship with HALES, including customers and vendors and (2) to remove HALES from YouTube and other social media outlets.

81. PRESTON also demanded money from HALES and its fans on Facebook:

> I'll say it here FOR ALL [HALES] FANS TO SEE if you are so damn worried about me being abused, and my little girl possibly being abused which she's not. PUT YOUR FRICKING money where your mouth is AND pay [COOK] $65,000.00 so he can walk away AND LEAVE ME IN PEACE.

Gaming The Malicious Conspiracy To Harm HALES
(The ANTI-WHAT THE HALES CONSPIRACY)

82. On June 19, 2023, PRESTON wrote to Ms. Shara Wolf, a Freelance Photojournalist at Freedom Public Press (hereinafter, "Ms. WOLF"), encouraging Ms. WOLF to "cover" her story, and stated:

> Last night's video was so full of lies and bullshit. I'm so glad you decided to take this and ***I know it's going to take time to build it*** but and that's okay cuz (sic) **I want to be able to sue him Shara and I want to be able to win**.

83. On June 27, 2023, PRESTON stated in a chat, "We need to expose [HALES and Mr. HALES] he needs to go under. ***I want to see him off YouTube permanently***."

84. In July, 2023, HALES announced that Mr. HALES would be filing for an injunction against PRESTON and COOK in his home state of Ohio.

85. On July 2, 2023, PRESTON said to WOLF:

> ***I need to Sue (sic) this son of a bitch***. I have no clue what jacked his brain and made him come after me except that one George his girlfriend was on our property or Martha (sic) and I made her leave because she told me I should give the baby up for adoption.

86. On July 5, 2023, PRESTON admitted that COOK had falsely stated on Facebook that Mr. HALES's girlfriend had "cancer in her ass." Regarding this, PRESTON told Ms. WOLF:

> I can't tell John [COOK] anything. Read his page it's nasty I made him take down the stuff that he wrote about Jeremy's girlfriend, having cancer again in her ass and what he wrote was disgusting and I told him that he needed to take it down

(and then PRESTON provided Ms. WOLF with the now expired link to the Facebook group where COOK made these false statements.)

87. On August 22, 2023, PRESTON published false statements about HALES and Mr. HALES when she forwarded a website link to Ms. WOLF. This website was titled, "Jeremy Hales of WhattheHale$ goes on a HOMOPHOBIC tirade! FAKE man." In forwarding that link to Ms. WOLF, PRESTON said, "the gay community is not happy."[4]

88. That same day – August 22, 2023, PRESTON wrote an email to the Mayor of Peninsula, Ohio, where Mr. HALES is a permanent resident. In this email PRESTON makes further false statements about HALES and Mr. HALES: "This man has bullied our town clerk into a stroke. He has bullied and belittled and humiliated me, destroyed my tortoise rescue with total lies, called CPS WITH FALSE ALLEGATIONS 7 TIMES, all because I ran for a seat and he thought I might get it over Therese Granger who at the time was I thought my friend and I had been I'm speaking terms with Jeremy." Regarding this communication, PRESTON told Ms. WOLF:

> This video shows the true, Jeremy Hales, the one he edits out and hides. ***He's stalking my family, my child and bullying, and harassing me by belittling me and LYING about me to everyone*** because I ran with Therese Granger for a seat on our board…
>
> [Mr. HALES] calls names (sic), bullies people abuses people for financial gain and you thought it was funny. He's not funny

[4] The website link is fortunately now deleted.

> his ex-wife and children didn't think he was funny no one here thinks he's funny. ***Causing our town clerk to have a stroke was not funny***.

89. After a full hearing with PRESTON and COOK present - in September 2023 - an Ohio court issued a two-year renewable Restraining Order/Injunction **against PRESTON and COOK** for stalking Mr. HALES and his partner.

90. To date, this has not stopped PRESTON and COOK from continuing their illegal acts against HALES and Mr. HALES. Rather than cease, PRESTON, for example, has demanded that HALES provide her with a list of the names and contact information of all of its donors.

91. PRESTON, in furtherance of her pursuit of Ms. WOLF as a journalist to cover her story, made the following statement to Ms. WOLF about HALES and Mr. HALES:

> Thank you for all your doing. I mean that with all my heart. Helping me stop him and get a case against him is going to be the greatest thing on Earth for me. I want to sue him and I hope to God he settles out of court and gives me enough to finish my house, pay off my stuff, and get my ex-husband [COOK] living somewhere else. Amen to all of that.

92. In September, 2023, PRESTON commenced legal proceedings against Mr. HALES by filing a "PETITION FOR INJUNCTION FOR PROTECTION AGAINST STALKING" in the circuit court of the Eighth Judicial Circuit In And For Levy County, Florida, case number 38-2023-DR-000416-DRA (hereinafter, the "STALKING CASE").

93. During the STALKING CASE, PRESTON pleaded her rights under the Fifth Amendment to the United States Constitution to not to answer questions about the STALKING CASE because the answer those questions could incriminate her.

94. In September, 2024, the STALKING CASE was dismissed in favor of Mr. HALES when PRESTON filed a notice of voluntary dismissal right before a hearing on Mr. HALES's motions to dismiss the case with prejudice.

95. Unfortunately, as will be shown, by September 2024, PRESTON had already enlisted her other Co-Defendants in this case to join the Malicious Conspiracy To Harm HALES.

96. Since May, 2023 to date, PRESTON solicits money publicly, via Facebook, marketing, and via GoFundMe projects, receiving money from consumers, and from WEEKS, claiming she is indigent while withholding her true income (including operating a flea market shop) from federal/state governments and consumers; she further fails to declare her income from donations to her 501 (c)(3) charity.

97. In actuality, PRESTON's process and strategy is nothing more than a scheme to enrich herself at the expense of consumers, HALES, and federal and state authorities.

D. COOK'S ACTS AND COOK'S FURTHERANCE OF WEEKS' SCHEME

98. COOK did the following:

> (1) in May 2023, when Hales returned from Ohio for a town meeting, COOK (1) pulled a gun on HALES as HALES was driving by on the public roadway to enter HALES' own property;
> (2) in May-June, 2023, COOK trespassed in his truck onto HALES' property with a gun, and when HALES confronted him and requested him to leave, COOK told HALES that if he moves one step further, he will see something "go bang"; and
> (3) in May-June, 2023, COOK publicly stated (falsely) on Facebook that HALES committed adultery by having sex outside of marriage, HALES' fiancé had oral sex with him – adding that he (COOK) has photographs to prove it.[5]

99. Accordingly, on or about May 23, 2023, HALES hired an attorney who sent a "cease and desist" letter to PRESTON and COOK, which stated, *inter alia*,

> [Y]our unlawful defamatory statements directed to Jeremy Hales on social media platforms constitutes libel under Florida Law. CEASE AND DESIST PUBLISHING ALL DEFAMATORY STATEMENTS… It has come to our attention that you posted defamatory statements regarding Jeremy Hales on various web pages including, but not limited to, Otter Creek friends and neighbors, Otter Creek politics, The Heart of Otter Creek, It's a Shell Thing Inc., as well as other social media platforms…We demand that you immediately (A) cease and desist your unlawful defamation of Mr. Jeremy Hales, Martha, George, What the Hales, and all other variations (including all misspellings and euphemisms such as the youtubers, neighbors, etc.), (B) immediately remove and delete all postings relating to Mr. Hales and his interests, and (C) that you provide us with written assurance within ten (10) days that you will cease and desist from further libel directed to our clients.

---

[5] COOK posted "Jeremy would you like me to post the picture of my c8ck in Georges (sic) mouth You can't take this one down."

100. Despite knowing the falsity of his statements, COOK used his false statements (1) to persuade others to help them in a public campaign to disparage HALES and Mr. HALES in order to negatively affect HALES' income by persuading anyone who has a business relationship with HALES to stop their relationship with HALES, including customers and vendors and (2) to remove HALES from YouTube and other social media outlets.

101. In July, 2023, Mr. HALES announced that he would be filing for an injunction against PRESTON and COOK in his home state of Ohio.

102. On July 5, 2023, PRESTON admitted that COOK had falsely stated on Facebook that Mr. HALES's girlfriend had "cancer in her ass." Regarding this, PRESTON told Ms. WOLF:

> I can't tell John [COOK] anything. Read his page it's nasty I made him take down the stuff that he wrote about Jeremy's girlfriend, having cancer again in her ass and what he wrote was disgusting and I told him that he needed to take it down (and then PRESTON provided Ms. WOLF with the now expired link to the Facebook group where COOK made these false statements.)

103. On July 27, 2023, COOK told Ms. WOLF: "Well, it sounds like we got rid of Martha. She doesn't want to come back now. We just gotta get rid of him [Mr. HALES]."

104. On July 30-31, 2023, COOK told Ms. WOLF:

> This is why ***we gotta finish the job on Jeremy***. Just because he gets arrested doesn't mean we stop nailing him to a cross.

> Is that legal? Can we really do that though (sic). All these types you find like this put themselves on a pedestal. Real AH. You seen how he's bragging on how he can't believe God gave him so much wealth. Well, ***he better watch it because God giveth and can also taketh***. He better watch it because now he's creating a bunch of OPPS that will go against him. ***Looks to me the party already has begun. Lots of people now dropping him like a hot potato***. Boys (sic) mouth is so dangerous and this type of talk causes people to get hurt. ***Or gets him hurt***.

105. On August 8, 2023, COOK stated in a chat, "I'm not worried about him. There's an old saying the older you get. (sic) The more life imprisonment doesn't mean s***."

106. After a full hearing with COOK present - in September 2023 - an Ohio court issued a two-year renewable Restraining Order/Injunction against COOK for stalking Mr. HALES and his fiancé.

107. To date, this has not stopped COOK from continuing his illegal acts against HALES and Mr. HALES.

108. Unfortunately, as will be shown, by September 2024, COOK had already enlisted his other Co-Defendants in this case to join the Malicious Conspiracy To Harm HALES.

109. COOK, upon believing WEEKS was giving a great deal of money to himself and to PRESTON, suggested – during a WEEKS livestream – that they all "go on a cruise" together.

110. In actuality, COOK's process and strategy is nothing more than a scheme to enrich himself at the expense of consumers and HALES.

E. HELM'S ACTS AND HELM'S FURTHERANCE OF WEEKS' SCHEME

111. HELM is a competitor of HALES for Internet Sales and Marketing, as a host and/or operator of a YouTube channel called "MLS (Making Law Simple)" - where he refers to himself as "God of Law" - with a current YouTube subscription fan base of over 3,000 people. HELM's YouTube Channel has an online store selling merchandise to viewers - https://www.youtube.com/@MLSMakingLawSimple/store and also seeks online "tips and donations" from his online viewers via Cash App: https://cash.app/$MLSLawShow. HELM has expended and continues to expend substantial time, money, and resources into acquiring subscribers, providing ongoing programs, and maintaining relationships and goodwill with its viewers.

112. In early 2024, HELM appeared on a YouTube livestream with HALES, and seemed very friendly to Mr. HALES. HELM asked Mr. HALES to join him on a livestream to play Legos with him, which is something that HELM enjoys doing on his YouTube channel.

113. Mr. HALES did not respond to HELM - regarding playing Legos with HELM on HELM's livestream. Thereafter, HELM saw a photo of Mr. HALES playing Legos with Larry Forman, Esq., who operates a YouTube channel with a current

YouTube subscription fan base of over 497,000 people - "The DUI Guy + Buckle Up" – and as such is a competitor with HELM on YouTube.

114. HELM was upset by this.

115. Accordingly, in retaliation, HELM contacted PRESTON and COOK and offered his assistance. As a result, HELM decided to join PRESTON and COOK's conspiracy to "take down" HALES and Mr. HALES.

116. In the spring of 2024, HELM contacted MATZKIN (and others) to enlist them as co-conspirators to "take down" HALES and Mr. HALES and labeling the Malicious Conspiracy To Harm Hales as the "Anti [What The Hales] Media Ecosystem."

117. HELM also invited MATZKIN to appear with him on HELM's YouTube channel, and MATZKIN did so in the summer of 2024, thus displaying their relationship as joint tortfeasors and coconspirators for all the world to see.

118. ***Since April 2024 HELM has made YouTube video publications*** on his YouTube channel - which are (1) part of the Anti [What The Hales] Media Ecosystem and (2) replete with further false statements about HALES and Mr. HALES.

119. For example, in one 2024 broadcast/publication (https://www.youtube.com/watch?v=ZBvX5Ew1L3k&t=18s) "Let's Talk About Florida Man #WhatTheHales," HELM made the following false statement about Mr. HALES: "Jeremy Hales falsely claims he does not earn money off of YouTube."

120. In another 2024 video, HELM said:

> The god of law is going to prove in this video why Jeremy Hales is twice as dumb and **that's not an opinion** - he's going to prove it because fair use anybody on YouTube can use my videos without permission it falls under fair use people can use my name image content videos and intellectual property to comment to each for news and the list goes on and on and on so regardless of how Mr. Hales simply ignores copyright law and now looking even more foolish - his own words coming back to haunt him.

121. On or about November 15, 2024, HELM appeared on a WEEKS YouTube livestream and stated – regarding the false signs about Mr. Jeremy Hales (See ¶ 65) - "I saw a picture of JERM planting the signs himself." See **Exhibit "3."**

122. In these videos HELM makes false statements about HALES and Mr. HALES that are presented in a way that imply clear factual accusations.

123. In actuality, HELM's process and strategy is nothing more than a scheme to enrich himself at the expense of consumers and HALES.

F. MATZKIN's ACTS AND MATZKIN's FURTHERANCE OF WEEKS' SCHEME

124. In early 2024, MATZKIN initiated contact with PRESTON by reaching out to her on Preston's Facebook Messenger.

125. As a result, MATZKIN decided to join PRESTON and COOK's plan to "take down" HALES and became a co-conspirator to "take down" HALES and Mr. HALES as part of the "Anti [What The Hales] Media Ecosystem."

126. To begin, MATZKIN, on or about March 11, 2024, sent a letter out to many YouTube Law channels, soliciting coverage for himself, and connecting this to HALES and Mr. HALES, stating, *inter alia*,

> From: Bruce Matzkin
> **Date: On Monday, March 11th, 2024**
> Subject: judicial misconduct & coverup
>
> **I've been catching up on the What the Hales saga.** As a 27-year lawyer, I have some thoughts if you're interested. I also have some questions that I'd love to ask, if you're willing, to understand the origins of the Hales/Lynette war...
>
> I have myself filed complaints against judges in the past. And written a lot of op-eds (New Haven Register, Connecticut Law Tribune... easy to find with Google search of my name).
>
> I have a story of a Connecticut judge who allowed two lawyers to engage in open conflict, and when the conflict was reported in a bar complaint, it was whitewashed to protect the lawyers and judge.
>
> It was all part of a scheme to steal a macaroni & cheese restaurant LLC and the market created by its founder.
>
> Very entertaining stuff, I assure you.
>
> Here's a link to a short op-ed that discusses the conflict and coverup, in the context of comparing that to a current, ongoing disciplinary proceeding against me... to show the dichotomy of "cover up/conjure up" in the lawyer disciplinary process in Connecticut. For powerful lawyers and judges, misconduct is covered up. For powerless solo lawyers, misconduct is conjured up (so they can make their numbers).
>
> https://insideinvestigator.org/opinion-connecticuts-lawyer-discipline-system-is-rigged/

> If interested, I have a much more detailed written article about the conflict/coverup, which I can share with you. It has not been published (yet). Every fact I state (in the op-ed and the longer piece) is documented in court transcripts and filings.
>
> Once this story is reported get picked up. It has legs. It just needs to get busted out by an appropriate source, such as yourself.
>
> The judge's conduct can and should result in serious consequences, especially given that it was not known when she was confirmed to the federal bench... if it were, she likely would not have won confirmation.
>
> Thanks, and please let me know if you'd like to speak.
>
> --
> ***Bruce Matzkin, Esq.***

127. It was about this time when MATZKIN initiated contact with PRESTON that he thereafter wrote the initial motions to dismiss in a Federal lawsuit related to this case. These motions were later denied – however these were filed "pro se" by PRESTON and COOK in April, 2024.

128. Trying to still stay hidden, on April 19, 2024 MATZKIN wrote to That Umbrella Guy ("TUG") – a popular YouTube host on legal issues nationwide – seeking to promote himself and stated - *inter alia*:

> Date: Fri, Apr 19, 2024 at 11:39 AM
> Subject: WhatThe Hales / Preston
> To: ANOTHER_UMBRELLA
>
> TUG,

> A serious question:
>
> Why are you and DUIGUY+ and Megan Fox and LegalVices and LegallyLive and MG Law all doing the exact same thing, and none of you have even one person on your webcast to offer a different perspective? Such as a lawyer who can engage in actual legal analysis?
>
> It's all the same, watching the videos of hearings, making silly jokes to pander to all the Hales fans, not ever acknowledging anything negative with respect to Hales.
>
> Megan Fox's original PJ Media article is so inaccurate about the legal issues, and amazingly, even lawyers like Larry Forman say the same nonsense (i.e., that the 6th Amendment or Fourth Amendment apply to the case before Judge DeThomasis). All of the YT coverage started from that.
>
> How and why did Megan decide to write that piece? How much of this is orchestrated by Hales for content?
>
> In my opinion, all it will take to completely turn the tables is a competent lawyer willing to represent Preston in federal court, where she can bring counterclaims that would be much stronger than the claims Hales brought.
>
> Let me know if you want to set your coverage apart by having a serious lawyer discuss the many issues not being discussed.
>
> --
> ***Bruce Matzkin, Esq.***

129. After sending these emails, MATZKIN stated publicly that his goal is to create a "Anti [What The Hales] media ecosystem."

130. Thereafter, HELM also invited MATZKIN to appear with him on HELM's YouTube channel, and MATZKIN did so in 2024, thus displaying their relationship as joint tortfeasors and co-conspirators for all the world to see.

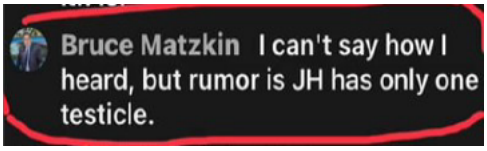
131. On February 17, 2025, MATZKIN contacted Whatnot Inc. (a company which has a business relationship with HALES) via email. In that email, MATZKIN made false statements to Whatnot Inc (copying a third party as well) - as part of the Malicious Conspiracy To Harm Hales - to damage HALES' business reputation and to interfere with HALES's relationship with Whatnot Inc., by stating:

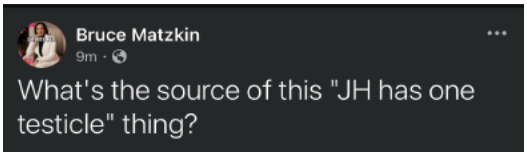
> "Mr. Kam should know that you are dragging him and his company into **your client's scam of contrived litigation** to create YouTube content for **your client's storylines**.
>
> Mr. Kam may be interested to learn that as part of your and **your client's litigation scam that you're now trying to involve Whatnot in, he committed perjury** to trick the federal court into exercising jurisdiction by **filing a false affidavit** stating my clients made and were making "online posts calling him a child predator constantly and ongoing to this day," and that as counsel you did nothing to confirm whether there were any such online posts before you signed the motion opposition (sic) that relied on that **perjured statement**.
>
> I would think any company would want to know if one of their **prominent customers** who regularly promotes his business with them, **is falsely using them to support fake lawsuits** (emphasis added)."

132. MATZKIN has also (in 2024-25) - as part of the Malicious Conspiracy To Harm Hales - published to a third party the following false statements about HALES and Mr. HALES:

- Jeremy Hales gave me a nickname with an “anti-semitic (sic) tinge”
- Jeremy Hales storylines involving the neighbors (his clients) are “fake.”
- “Fox and That Umbrella Guy profit from Hales' cyberstalking, under the guise of "journalism."
- Jeremy Hales is a “public stalker of private victims.”
- Jeremy Hales “has fabricated storylines using innocent, powerless peoples' lives to sell as entertainment for profit.”

133. In August 2024 in YouTube Chat (and on or about August 18, 2024 on a Facebook page), MATZKIN posted as follows:





134. MATZKIN wrote the following false statement via email – on 8/16/24: “What The Hales is “destroying the lives of helpless people, using a virtual mob who send menacing and threatening messages to [PRESTON] every day, and have caused her life to be consumed with CPS reports from anonymous fans.”

135. MATZKIN made the following false statements publicly via YouTube on July 17, 2024:

- Jeremy Hales is a "homophobe who's going around on video you know threatening people and calling them such names."
- Jeremy Hales is a "psychopath douchebag."
- Jeremy Hales' daily mission is "to come up with 45 minutes of vitriol and name calling and defamation and incitement of people whom he knows you know love him and and and (sic) do whatever he wants or feel or believe whatever he tells them to uh (sic) and uses that power and that platform to literally co-opt lives of private people and

  and (sic) cause them uh (sic) nothing but uh (sic) harassment and and (sic) threats and Terror and strangers uh (sic) you know invading their their (sic) peace and their space and their lives."
- Jeremy Hales "has no proof" that PRESTON wrote the false signs about him.
- Jeremy Hales said PRESTON "should experience being raped."
- Jeremy Hales accused PRESTON's grandson "of being a pedophile" and "a homosexual – that too."

136. MATZKIN makes false statements about HALES and Mr. HALES that are presented in a way that imply clear factual accusations.

137. MATZKIN publicly states that he is/was acting as a pro bono lawyer for PRESTON and/or COOK.

138. However, upon verified information this statement is not true, and MATZKIN's written agreement with PRESTON and/or COOK is based on a contingency.

139. In actuality, MATZKIN's process and strategy is nothing more than a scheme to enrich himself at the expense of consumers and HALES.

G. HUGHES' ACTS AND HUGHES' FURTHERANCE OF WEEKS' SCHEME

140. HUGHES, on September 5, 2023, wrote the following false statement in an email (which is now a public record): "Every single day [HALES] puts up a video that includes some slurs and lies against [PRESTON], even when the video isn't related to Otter Creek at all. Every. Single. Day."

141. In another public email, HUGHES wrote the following false statement:

> [Mr. HALES] has sent his followers after people in Otter Creek to harass them using state agencies and even the IRS, making false claims about Michelle slapping her daughter in the face in public, not caring properly for her {DHS} (sic), animal abuse through her legal and well respected turtle and tortoise rescue Levy County Health Department, and other agencies.
>
> To go after others he has targeted, he uses Florida state reporting agencies and call numbers to pass out to his followers from all over the world to call in or fill out forms making accusations based entirely upon his edited videos and explanations, often containing false information.

142. HUGHES makes false statements about HALES and Mr. HALES that are presented in a way that imply clear factual accusations, all as part of the Anti [What The Hales] Media Ecosystem – the Malicious Conspiracy To Harm Hales.

143. In the fall of 2023, HUGHES also contacted YouTube and made false statements in effort to strike HALES' YouTube channel.

144. In actuality, HUGHES' process and strategy is nothing more than a scheme to enrich PRESTON at the expense of consumers and HALES.

H. KESZEY's ACTS AND KESZEY's FURTHERANCE OF WEEKS' SCHEME

145. KESZEY is a competitor of HALES for Internet Sales and Marketing, as a host and/or operator of a YouTube channel called "Get Swamped" (and other social media platforms, including, without limitation, Instagram, Twitch, Discord, TikTok, and via *Whatnot Auctions*) with a current YouTube subscription fan base of over 65,000 people. KESZEY has expended and continues to expend substantial time, money, and resources into acquiring subscribers, providing ongoing programs, and maintaining relationships and goodwill with them. KESZEY accepts and seeks online "tips and donations" from his online viewers – via Facebook (https://www.facebook.com/GetSwamped/?locale=it_IT) mail requests to Get Swamped PO Box 1892 Bushnell Fl 33513 and/or to PayPal (PAYPAL @GetSwamped email robbie@keszeybrothers.com).

146. In a 2024 YouTube livestream on WEEKS business platform and KESZEY made the following false statements about HALES and Mr. HALES: “All HALES does is bully people. That’s it;” “[HALES] invited PRESTON to come here [to Otter Creek, Florida] you’re going to do a Tortoise sanctuary, that’d be cool. Then, just because HALES didn’t like the way they lived or something, he withdrew from it.” That’s his M.O.” https://www.youtube.com/watch?v=m5pyIpTNoeY

147. In this video: (1) KESZEY makes false statements about HALES and Mr. HALES that are presented in a way that imply clear factual accusations, and (2) MATZKIN appeared with KESZEY with WEEKS on her YouTube channel in 2024, thus displaying their relationship as joint tortfeasors and co-conspirators for all the world to see, all as part of the Anti [What The Hales] Media Ecosystem the Malicious Conspiracy To Harm Hales.

148. KESZEY makes false statements about Mr. HALES that are presented in a way that imply clear factual accusations.

149. In actuality, KESZEY's process and strategy is nothing more than a scheme to enrich himself at the expense of consumers and HALES.

I. TESCHENDORF’s ACTS AND TESCHENDORF’s FURTHERANCE OF WEEKS’ SCHEME

150. TESCHENDORF is a competitor of HALES for Internet Sales and Marketing, as a host and/or operator of a YouTube channel called “Miltownsbest” with a current YouTube subscription fan base of over 1,700 people - where he refers to himself

as "Supa Dave" (and other social media platforms, including, without limitation, Facebook and Twitter. TESCHENDORF's YouTube Channel has an online store selling merchandise – see https://www.youtube.com/@MILTOWNSBEST/store, and also sells merchandise online via Bonfire - bonfire.com/store/miltownsbest. People who subscribe with TESCHENDORF's YouTube Channel often pay monthly fees to TESCHENDORF for *premium* access to TESCHENDORF. TESCHENDORF has expended and continues to expend substantial time, money, and resources into acquiring subscribers, providing ongoing programs, and maintaining relationships and goodwill with his viewers.

151. In a YouTube livestream on December 3, 2024, TESCHENDORF made the following false statements about HALES and Mr. HALES:

> The fans of HALES have seen a content creator go from a God-fearing Christian man who did everything for the right reasons to doing anything to win and bankrupt his opponents…he has already demonstrated his abuse of litigation by publishing a 7 hour videotaped Zoom deposition of Michelle Preston this was taken by his present Counsel last January during a state court TRO action in which Miss Preston was the plaintiff yeah it's true for the purposes of entertaining his audience by mocking and humiliating her throughout the broadcast yeah he did it for almost a whole week.

152. In this video, TESCHENDORF makes false statements about HALES and Mr. HALES that are presented in a way that imply clear factual accusations.

153. TESCHENDORF has appeared online (on his and others' YouTube channels) with MATZKIN, WEEKS, KESZEY, and RAYMOND thus displaying their

relationship as joint tortfeasors and co-conspirators for all the world to see, all as part of the Anti [What The Hales] Media Ecosystem the Malicious Conspiracy To Harm Hales.

154. In actuality, TESCHENDORF's process and strategy is nothing more than a scheme to enrich himself at the expense of consumers and HALES.

J. RAYMOND's ACTS AND RAYMOND's FURTHERANCE OF WEEKS' SCHEME

155. RAYMOND is a host and/or operator of a YouTube channel called "Ray Bonecrusher" with a current YouTube subscription fan base of over 8,500 people.

156. RAYMOND conceals his location at all times when operating his YouTube channel.

157. Since at least June 2024, RAYMOND has made public videos stating that that he "in the mix trying to tear [HALES and Mr. HALES] apart.

158. On February 22, 2025, RAYMOND made the following false statement about HALES and Mr. HALES, "what have we said about Jeremy when Michelle and John were involved… what did Jeremy say: "I want money give me all your money I can give it back to you. **I want money!"** He does that every week he goes out live and he he (sic) gets his eyes going and he slobbers."

159. RAYMOND makes false statements about HALES and Mr. HALES that are presented in a way that imply clear factual accusations.

160. RAYMOND recommends viewers to watch the YouTube channels of TESCHENDORF, WEEKS, KESZEY, and LUTHMANN, and RAYMOND has

appeared online (on others' YouTube channels) with TESCHENDORF, WEEKS, and KESZEY thus displaying their relationship as joint tortfeasors and co-conspirators for all the world to see, all as part of the Anti [What The Hales] Media Ecosystem - the Malicious Conspiracy To Harm Hales.

161. In actuality, RAYMOND's process and strategy is nothing more than a scheme to enrich PRESTON at the expense of consumers and HALES.

K. LUTHMANN's ACTS AND LUTHMANN's FURTHERANCE OF WEEKS' SCHEME

162. On or about January 28, 2025, LUTHMANN wrote the following via email regarding Mr. HALES to the Anti-Defamation League (ADL), which stated, in pertinent part:

- "Are you offended by Jeremy Hales, Matthew "Lewey" Lewis / TUG, and Megan Fox's poisonous rhetoric, Anti-Semitism, and wickedness?"
- "Sometimes, it's better to chase and ambulance or a dog-bite case than to represent a cabal of despicable persons who would condone dangerous attitudes that condone Anti-Semitism, Eugenics, and Mass Murder. No legal fee is worth the damage done to your soul."
- "I make a simple offer. And it's not so much of an offer as a plea to your humanity. Please, Jeremy, Matthew, Megan, and your group - put the Anti-Semitism to rest. Put the charged language to rest and all the rhetoric that smacks of "eugenics" and "tide pods" and "dead children" born to "stupid

parents, "and of denigration, dehumanization, and hatred. These are the mile markers on a road that leads only to one place."[6]

163. On or about January 26, 2025, LUTHMANN wrote the following via email to the YouTube channel "That Umbrella Guy" – who creates online programming about HALES and Mr. HALES on his YouTube channel, which stated in pertinent part:

- "I'm not like Megan Fox who gets paid by Jeremy Hales for coverage in a combination of quid pro quo, traffic, sex, and/or candy, in my learned opinion."
- "I'll tell you where going Ad Hominem against Rich Luthmann won't get you. As bad as you say I am, as bad as the bullshit you can conjure up, I'm still not as bad as Jeremy Hales. I'm not an Anti-Semite. I don't hate Jews."

164. Also, in 2025, LUTHMANN posted a Video "revenge porn" of Mr. HALES as Adolf Hitler (adding a "Hitler mustache" to Mr. HALES' photo). See https://luthmann.substack.com/p/megan-fox-youtuber-jeremy-hales-fake

Creation Of A Copycat What the Hale$ Facebook Page To Lure Supporters Of HALES

165. On November 25, 2023, a Facebook page was established – called "What The Hales" - which appears to be an official Facebook page of What The Hale$.

[6] The ADL is a New York-based international non-governmental organization that was founded to combat antisemitism, as well as other forms of bigotry and discrimination.

166. This page currently has over 4,800 members. Fans of HALES comment in this group in support of HALES. To their surprise, these supporters find out that this is nothing more than a "hate group" designed to damage the reputation of HALES and Mr. HALES in furtherance of the Anti [What The Hales] Media Ecosystem - the Malicious Conspiracy To Harm Hales.

167. MATZKIN, HELM, WEEKS, PRESTON, COOK, LUTHMANN and HUGHES personally post to this hate group.

168. Moreover, comments from all Defendants are posted in this hate group including, without limitation, links to false YouTube videos and pages about HALES and Mr. HALES.

169. Some examples of the postings in this group are at https://www.facebook.com/groups/340750118547073/media:

- "How do you Germ lickers like Germ getting ready to settle with Ms. Preston. Look where your $$$ is going."
- "Why are the Hales followers not mentioning that Germ and Martha have not mentioned lynette or John since they were served last week? Bruce has kicked Hales butt again!"
- "So once Germ moves will all you supporters of his toxic behavior still defend him when he finds his next targets for content?"
- "Good night gemmy lintlickers"

At all times relevant, all Defendants are actively (1) encouraging people to watch the public videos made by WEEKS, TESCHENDORF, and RAYMOND, *inter alia,* and (2) mentioning publicly that they are reading the Copycat What the Hale$ Facebook pages – where Defendants continue posting statements about HALES and Mr. HALES that are presented in a way that imply clear factual accusations.

DAMAGE TO HALES' GOODWILL AND REPUTATION

170. Defendants have engaged in false or misleading advertising and false or misleading statements injurious to HALES.

171. HALES suffered injury and harm to its reputation and HALES has incurred costs associated with its extensive efforts to mitigate against such injury and harm.

172. As remedies for these injuries, HALES seeks corrective advertising, recovery of the Defendants' profits, treble damages, damage to good will, profits lost by the Plaintiff, attorney's fees.

COUNT 1 – MALICIOUS PROSECUTION
(PRESTON)

173. Mr. HALES realleges and reincorporates the allegations contained in paragraphs 1 through 6, paragraphs 18 through 22, paragraphs 55 through 96, and paragraphs 165 through 172 above as if more fully set forth herein.

174. The stalking/cyberstalking proceedings commenced by PRESTON against Plaintiff originated solely with her actions. As such, these actions constitute the legal causation of the proceedings that were commenced against Mr. HALES.

175. A final dismissal was filed with respect to the above charges against Mr. HALES, in favor of Mr. HALES and against PRESTON.

176. This result represents a bona fide termination of the prosecution of the stalking cyberstalking proceedings brought by PRESTON's actions that was in favor of Mr. HALES.

177. At no time material to this matter was there probable cause for stalking/cyberstalking proceedings.

178. In commencing the stalking/cyberstalking proceedings, PRESTON acted with malice against Mr. HALES.

179. As a result of the foregoing, Mr. HALES suffered damages.

WHEREFORE, Mr. HALES moves this Honorable Court to grant damages for damage suffered in the amount of $390,000.00 (THREE HUNDRED NINETY THOUSAND DOLLARS) plus prejudgment interests, costs of suit, and such other relief this Court deems just and proper.

COUNT 2 – VIOLATION OF FLORIDA'S DECEPTIVE AND UNFAIR TRADE PRACTICES ACT, FLA. STAT. § 501.201, et seq. (WEEKS)

180. HALES realleges and reincorporates the allegations contained in paragraphs 1 through 6, paragraphs 18 through 54, and paragraphs 165 through 172 above as if more fully set forth herein.

181. This is a cause of action for actual damages and injunctive relief for violations of the Florida Deceptive and Unfair Trade Practices Act, Fla. Stat. § 501.201, *et seq.* ("FDUTPA"), against WEEKS, including unconscionable acts and practices, and unfair and deceptive practices in the conduct of trade or commerce.

182. WEEKS engaged in "trade or commerce" as defined by Fla. Stat. §501.203(8).

183. HALES is an "interested party or person" as defined by Section 501.203(6), Florida Statutes.

184. WEEKS engaged in unconscionable, unfair, and deceptive acts or practices (1) that offend established public policy and are immoral, unethical, oppressive, unscrupulous, and substantially injurious to consumers, (2) that are likely to deceive a consumer acting reasonably in the same circumstances, and (3) that caused injury or detriment to consumers.

185. As a direct and proximate result of WEEKS' deceptive and unfair trade practices, HALES has suffered actual damages.

186. HALES has a clear legal right or interest in being free from WEEKS' deceptive or unfair advertising, as the false statements and representations set forth above have caused specific past and present harm, and will result in future harm if WEEKS is not enjoined.

187. WEEKS continues to engage in such false and deceptive marketing campaigns and fraudulent representations for the purpose of damaging HALES and consumers without any valid legal basis, and therefore, there is a strong likelihood that HALES and consumers will suffer irreparable harm on an ongoing basis and any remedy at law for WEEKS' perpetuation of the deceptive, fraudulent, and unfair marketing practices, is inadequate.

188. Pursuant to Fla. Stat. §501.211(1), declaratory and injunctive relief are viable forms of relief for violations of FDUTPA in this case because:

- WEEKS' actions, as outlined above, constitute deceptive, misleading, and unfair practices in violation of FDUTPA;
- WEEKS procured unwarranted and unjustified damages to HALES and consumers due to WEEKS' deceptive, misleading, and unfair practices in violation of FDUTPA, so HALES has a substantial likelihood of success on the merits;
- WEEKS continues to solicit consumers through deceptive, misleading, and unfair practices in violation of FDUTPA, which shows a strong likelihood that HALES and consumers will suffer irreparable harm on an ongoing basis because any remedy at law for WEEKS' perpetuation of deceptive, misleading, and unfair practices in violation of FDUTPA is inadequate; and
- An injunction would serve the public interest because, *inter alia*, an

injunction would protect consumers from giving any more money to WEEKS.

189. As a direct and proximate result of WEEKS" unlawful conduct, HALES is being irreparably harmed and is entitled to have WEEKS' conduct enjoined and restrained.

WHEREFORE, HALES respectfully demands judgment in its favor and against Defendant WEEKS and requests temporary and permanent injunctive relief, actual damages in the amount of NINE HUNDRED FIFTY-NINE THOUSAND ($959,000.00) Dollars, punitive damages upon a showing of sufficient evidence of fraud, attorney's fees and costs incurred in this action and in any appeal pursuant to Fla. Stat., §501.2105, and such other and further relief as the Court may deem proper.

COUNT 3 – FALSE ADVERTISING
UNDER THE LANHAM ACT, 15 U.S.C. § 1125(a)
(WEEKS)

190. HALES realleges and reincorporates the allegations contained in paragraphs 1 through 6, paragraphs 18 through 54, and paragraphs 165 through 172 above as if more fully set forth herein.

191. By engaging in the conduct described above, WEEKS violated section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a)(1)(A).

192. In connection with WEEKS business, WEEKS used in commerce false or misleading descriptions of fact and false or misleading representations of fact, that in

commercial advertising or promotion, misrepresented the characteristics, qualities, and the reputation of HALES in HALES' commercial activities.

193. WEEKS' false and misleading statements deceived, or have the capacity to deceive consumers into incorrectly believing they are making charitable donations and not for WEEKS' personal use and benefit.

194. WEEKS' false and misleading statements have a material effect on customer purchasing decisions.

195. Because WEEKS markets and sells her products online and into multiple states, WEEKS' misrepresentations affect interstate commerce.

196. By virtue of WEEKS' conduct, WEEKS has willfully violated Section 32 of the Lanham Act, 15 U.S.C. § 1125(a), and HALES has suffered and will continue to suffer irreparable damage to its business, reputation, and goodwill and has lost sales and profits it would have made but for WEEKS' willful unfair competition.

WHEREFORE, because WEEKS caused and is likely to continue causing substantial injury to the public and to HALES, HALES is entitled to injunctive relief and to recover WEEKS' profits, actual damages in the amount of ONE MILLION EIGHT HUNDRED SEVENTY-NINE THOUSAND ($1,879,000.00) Dollars, treble damages, enhanced profits and damages, costs, and reasonable attorneys' fees under 15 U.S.C. §§ 1116 and 1117.

COUNT 4 –TORTIOUS INTERFERENCE

WITH ADVANTAGEOUS BUSINESS RELATIONSHIPS (WEEKS)

197. HALES realleges and reincorporates the allegations contained in paragraphs 1 through 6, paragraphs 18 through 54, and paragraphs 165 through 172 above as if more fully set forth herein.

198. This is an action for damages against WEEKS for ONE MILLION EIGHT HUNDRED THIRTY-FIVE Thousand ($1,835,000.00) Dollars.

199. HALES maintains valid and enforceable contracts and advantageous business relationships with its customers and other companies including, without limitation, Whatnot, Inc. and YouTube.

200. WEEKS is knowledgeable of these business relationships between HALES and its customers and other companies including, without limitation, Whatnot, Inc. and YouTube.

201. Despite knowledge of the customer's contractual and business relationship with HALES, WEEKS intentionally and without valid justification interferes with such relationships.

202. HALES is damaged by WEEKS's unlawful conduct by losing revenue streams that otherwise would remain with HALES absent WEEKS's interference with HALES' valid business relationships.

WHEREFORE, HALES respectfully requests that the Court enter judgment in its favor and against WEEKS, and award the following relief: Compensatory damages

as stated above and such other and further relief as the Court may deem appropriate in the circumstances.

COUNT 5 – TORTIOUS INTERFERENCE WITH ADVANTAGEOUS BUSINESS RELATIONSHIPS (MATZKIN)

203. HALES realleges and reincorporates the allegations contained in paragraphs 1 through 6, paragraphs 18 through 54, paragraphs 125-139, and paragraphs 165 through 172 above as if more fully set forth herein.

204. This is an action for damages against MATZKIN for ONE MILLION TWO HUNDRED TWENTY-NINE THOUSAND ($1,229,000.00) Dollars.

205. HALES maintains valid and enforceable contracts and advantageous business relationships with its customers and other companies including, without limitation, Whatnot, Inc. and YouTube.

206. MATZKIN is knowledgeable of these business relationships between HALES and its customers and other companies including, without limitation, Whatnot, Inc. and YouTube.

207. Despite knowledge of the customer's contractual and business relationship with HALES, MATZKIN intentionally and without valid justification interferes with such relationships.

208. HALES is damaged by MATZKIN's unlawful conduct by losing revenue streams that otherwise would remain with HALES absent MATZKIN's interference with HALES' valid business relationships.

WHEREFORE, HALES respectfully requests that the Court enter judgment in its favor and against MATZKIN, and award the following relief: Compensatory damages as stated above and such other and further relief as the Court may deem appropriate in the circumstances.

COUNT 6 – CIVIL CONSPIRACY
(WEEKS)

209. HALES realleges and reincorporates the allegations contained in paragraphs 1 through 6, paragraphs 18 through 54, and paragraphs 165 through 172 above as if more fully set forth herein.

210. This is an action for damages in excess of $75,000.00.

211. WEEKS and all Defendants agreed to intentionally participate in a civil conspiracy among themselves, and with other individuals, the purpose of which was to commit (1) violations of Florida's Deceptive And Unfair Trade Practices Act, FLA. STAT. § 501.201, et seq. (2) False Advertising Under The Lanham Act, 15 U.S.C. § 1125(a), and (3) the tort of Tortious Interference With Advantageous Business Relationships.

212. Throughout the course of the conspiracy, WEEKS and all Defendants are acting in concert, coordinated in furtherance of the common scheme.

213. WEEKS knew of the scheme and assisted in it for all of the acts of all Defendants/coconspirators, including, engaging in unconscionable, unfair, and deceptive acts or practices that offend established public policy and are immoral, unethical, oppressive, unscrupulous, or substantially injurious to consumers, that are likely to deceive a consumer acting reasonably in the same circumstances, and that caused injury or detriment to consumers; making false or misleading descriptions of fact and false or misleading representations of fact, that in commercial advertising or promotion, misrepresented the characteristics, qualities, and the reputation of HALES in HALES' commercial activities; and despite knowledge of the customer's contractual and business relationships with HALES, intentionally and without valid justification interfering with such relationships.

214. WEEKS is jointly and severally liable for the acts of the other members of the conspiracy which were committed in furtherance of the conspiracy.

215. WEEKS agreed to launch a campaign to damage HALES, as evidenced by WEEKS' actions.

216. As a result of the conspiracy, HALES suffered damages.

WHEREFORE, HALES respectfully requests that the Court enter judgment in its favor and against WEEKS, jointly and severally with all Defendants.

COUNT 7 – CIVIL CONSPIRACY (MATZKIN)

217. HALES realleges and reincorporates the allegations contained in paragraphs 1 through 6, paragraphs 18 through 54, paragraphs 125-139, and paragraphs 165 through 172 above as if more fully set forth herein.

218. This is an action for damages in excess of $75,000.00.

219. MATZKIN and all Defendants agreed to intentionally participate in a civil conspiracy among themselves, and with other individuals, the purpose of which was to commit (1) violations of Florida's Deceptive And Unfair Trade Practices Act, FLA. STAT. § 501.201, et seq. (2) False Advertising Under The Lanham Act, 15 U.S.C. § 1125(a), and (3) the tort of Tortious Interference With Advantageous Business Relationships.

220. Throughout the course of the conspiracy, MATZKIN and all Defendants, are acting in concert, coordinated in furtherance of the common scheme.

221. MATZKIN knew of the scheme and assisted in it for all of the acts of all Defendants/coconspirators, including, engaging in unconscionable, unfair, and deceptive acts or practices that offend established public policy and are immoral, unethical, oppressive, unscrupulous, or substantially injurious to consumers, that are likely to deceive a consumer acting reasonably in the same circumstances, and that caused injury or detriment to consumers; making false or misleading descriptions of fact and false or misleading representations of fact, that in commercial advertising or promotion, misrepresented the characteristics, qualities, and the reputation of HALES in HALES'

commercial activities; and despite knowledge of the customer's contractual and business relationship with HALES, intentionally and without valid justification interfering with such relationships.

222. MATZKIN is jointly and severally liable for the acts of the other members of the conspiracy which were committed in furtherance of the conspiracy.

223. MATZKIN agreed to launch a campaign to damage HALES, as evidenced by MATZKIN's actions.

224. As a result of the conspiracy, HALES suffered damages.

WHEREFORE, HALES respectfully requests that the Court enter judgment in its favor and against MATZKIN, jointly and severally with all Defendants.

COUNT 8 – CIVIL CONSPIRACY
(PRESTON)

225. HALES realleges and reincorporates the allegations contained in paragraphs 1 through 6, paragraphs 18 through 54, paragraphs 55 through 96, and paragraphs 165 through 172 above as if more fully set forth herein.

226. This is an action for damages in excess of $75,000.00.

227. PRESTON and all Defendants agreed to intentionally participate in a civil conspiracy among themselves, and with other individuals, the purpose of which was to commit (1) violations of Florida's Deceptive And Unfair Trade Practices Act, FLA. STAT. § 501.201, et seq. (2) False Advertising Under The Lanham Act, 15 U.S.C. §

1125(a), and (3) the tort of Tortious Interference With Advantageous Business Relationships.

228. Throughout the course of the conspiracy, PRESTON and all Defendants are acting in concert, coordinated in furtherance of the common scheme.

229. PRESTON knew of the scheme and assisted in it for all of the acts of all Defendants/coconspirators, including, engaging in unconscionable, unfair, and deceptive acts or practices that offend established public policy and are immoral, unethical, oppressive, unscrupulous, or substantially injurious to consumers, that are likely to deceive a consumer acting reasonably in the same circumstances, and that caused injury or detriment to consumers; making false or misleading descriptions of fact and false or misleading representations of fact, that in commercial advertising or promotion, misrepresented the characteristics, qualities, and the reputation of HALES in HALES' commercial activities; and despite knowledge of the customer's contractual and business relationship with HALES, intentionally and without valid justification interfering with such relationships.

230. PRESTON is jointly and severally liable for the acts of the other members of the conspiracy which were committed in furtherance of the conspiracy.

231. PRESTON agreed to launch a campaign to damage HALES, as evidenced by PRESTON’s actions.

232. As a result of the conspiracy, HALES suffered damages.

WHEREFORE, HALES respectfully requests that the Court enter judgment in its favor and against PRESTON, jointly and severally with all Defendants.

COUNT 9 – CIVIL CONSPIRACY
(COOK)

233. HALES realleges and reincorporates the allegations contained in paragraphs 1 through 6, paragraphs 18 through 54, paragraphs 97 through 111, and paragraphs 165 through 172 above as if more fully set forth herein.

234. This is an action for damages in excess of $75,000.00.

235. COOK and all Defendants agreed to intentionally participate in a civil conspiracy among themselves, and with other individuals, the purpose of which was to commit (1) violations of Florida's Deceptive And Unfair Trade Practices Act, FLA. STAT. § 501.201, et seq. (2) False Advertising Under The Lanham Act, 15 U.S.C. § 1125(a), and (3) the tort of Tortious Interference With Advantageous Business Relationships.

236. Throughout the course of the conspiracy, COOK and all Defendants are acting in concert, coordinated in furtherance of the common scheme.

237. COOK knew of the scheme and assisted in it for all of the acts of all Defendants/coconspirators, including, engaging in unconscionable, unfair, and deceptive acts or practices that offend established public policy and are immoral, unethical, oppressive, unscrupulous, or substantially injurious to consumers, that are likely to deceive a consumer acting reasonably in the same circumstances, and that caused injury

or detriment to consumers; making false or misleading descriptions of fact and false or misleading representations of fact, that in commercial advertising or promotion, misrepresented the characteristics, qualities, and the reputation of HALES in HALES' commercial activities; and despite knowledge of the customer's contractual and business relationship with HALES, intentionally and without valid justification interfering with such relationships.

238. COOK is jointly and severally liable for the acts of the other members of the conspiracy which were committed in furtherance of the conspiracy.

239. COOK agreed to launch a campaign to damage HALES, as evidenced by COOK's actions.

240. As a result of the conspiracy, HALES suffered damages.

WHEREFORE, HALES respectfully requests that the Court enter judgment in its favor and against COOK, jointly and severally with all Defendants.

COUNT 10 – CIVIL CONSPIRACY
(HUGHES)

241. HALES realleges and reincorporates the allegations contained in paragraphs 1 through 6, paragraphs 18 through 54, paragraphs 140-144, and paragraphs 165 through 172 above as if more fully set forth herein.

242. This is an action for damages in excess of $75,000.00.

243. HUGHES and all Defendants agreed to intentionally participate in a civil conspiracy among themselves, and with other individuals, the purpose of which was to

commit (1) violations of Florida's Deceptive And Unfair Trade Practices Act, FLA. STAT. § 501.201, et seq. (2) False Advertising Under The Lanham Act, 15 U.S.C. § 1125(a), and (3) the tort of Tortious Interference With Advantageous Business Relationships.

244. Throughout the course of the conspiracy, HUGHES and all Defendants are acting in concert, coordinated in furtherance of the common scheme.

245. HUGHES knew of the scheme and assisted in it for all of the acts of all Defendants/coconspirators, including, engaging in unconscionable, unfair, and deceptive acts or practices that offend established public policy and are immoral, unethical, oppressive, unscrupulous, or substantially injurious to consumers, that are likely to deceive a consumer acting reasonably in the same circumstances, and that caused injury or detriment to consumers; making false or misleading descriptions of fact and false or misleading representations of fact, that in commercial advertising or promotion, misrepresented the characteristics, qualities, and the reputation of HALES in HALES' commercial activities; and despite knowledge of the customer's contractual and business relationship with HALES, intentionally and without valid justification interfering with such relationships.

246. HUGHES is jointly and severally liable for the acts of the other members of the conspiracy which were committed in furtherance of the conspiracy.

247. HUGHES agreed to launch a campaign to damage HALES, as evidenced by HUGHES' actions.

248. As a result of the conspiracy, HALES suffered damages.

WHEREFORE, HALES respectfully requests that the Court enter judgment in its favor and against HUGHES, jointly and severally with all Defendants.

COUNT 11 – CIVIL CONSPIRACY
(HELM)

249. HALES realleges and reincorporates the allegations contained in paragraphs 1 through 6, paragraphs 18 through 54, paragraphs 112-124, and paragraphs 165 through 172 above as if more fully set forth herein.

250. This is an action for damages in excess of $75,000.00.

251. HELM and all Defendants agreed to intentionally participate in a civil conspiracy among themselves, and with other individuals, the purpose of which was to commit (1) violations of Florida's Deceptive And Unfair Trade Practices Act, FLA. STAT. § 501.201, et seq. (2) False Advertising Under The Lanham Act, 15 U.S.C. § 1125(a), and (3) the tort of Tortious Interference With Advantageous Business Relationships.

252. Throughout the course of the conspiracy, HELM and all Defendants are acting in concert, coordinated in furtherance of the common scheme.

253. HELM knew of the scheme and assisted in it for all of the acts of all Defendants/coconspirators, including, engaging in unconscionable, unfair, and deceptive

acts or practices that offend established public policy and are immoral, unethical, oppressive, unscrupulous, or substantially injurious to consumers, that are likely to deceive a consumer acting reasonably in the same circumstances, and that caused injury or detriment to consumers; making false or misleading descriptions of fact and false or misleading representations of fact, that in commercial advertising or promotion, misrepresented the characteristics, qualities, and the reputation of HALES in HALES' commercial activities; and despite knowledge of the customer's contractual and business relationship with HALES, intentionally and without valid justification interfering with such relationships.

254. HELM is jointly and severally liable for the acts of the other members of the conspiracy which were committed in furtherance of the conspiracy.

255. HELM agreed to launch a campaign to damage HALES, as evidenced by HELM's actions.

256. As a result of the conspiracy, HALES suffered damages.

WHEREFORE, HALES respectfully requests that the Court enter judgment in its favor and against HELM, jointly and severally with all Defendants.

COUNT 12 – CIVIL CONSPIRACY (KESZEY)

257. HALES realleges and reincorporates the allegations contained in paragraphs 1 through 6, paragraphs 18 through 54, paragraphs 145-149, and paragraphs 165 through 172 above as if more fully set forth herein.

258. This is an action for damages in excess of $75,000.00.

259. KESZEY and all Defendants agreed to intentionally participate in a civil conspiracy among themselves, and with other individuals, the purpose of which was to commit (1) violations of Florida's Deceptive And Unfair Trade Practices Act, FLA. STAT. § 501.201, et seq. (2) False Advertising Under The Lanham Act, 15 U.S.C. § 1125(a), and (3) the tort of Tortious Interference With Advantageous Business Relationships.

260. Throughout the course of the conspiracy, KESZEY and all Defendants are acting in concert, coordinated in furtherance of the common scheme.

261. KESZEY knew of the scheme and assisted in it for all of the acts of all Defendants/coconspirators, including, engaging in unconscionable, unfair, and deceptive acts or practices that offend established public policy and are immoral, unethical, oppressive, unscrupulous, or substantially injurious to consumers, that are likely to deceive a consumer acting reasonably in the same circumstances, and that caused injury or detriment to consumers; making false or misleading descriptions of fact and false or misleading representations of fact, that in commercial advertising or promotion, misrepresented the characteristics, qualities, and the reputation of HALES in HALES' commercial activities; and despite knowledge of the customer's contractual and business relationship with HALES, intentionally and without valid justification interfering with such relationships.

262. KESZEY is jointly and severally liable for the acts of the other members of the conspiracy which were committed in furtherance of the conspiracy.

263. KESZEY agreed to launch a campaign to damage HALES, as evidenced by KESZEY's actions.

264. As a result of the conspiracy, HALES suffered damages.

WHEREFORE, HALES respectfully requests that the Court enter judgment in its favor and against KESZEY, jointly and severally with all Defendants.

COUNT 13 – CIVIL CONSPIRACY
(TESCHENDORF)

265. HALES realleges and reincorporates the allegations contained in paragraphs 1 through 6, paragraphs 18 through 54, paragraphs 150-154, and paragraphs 165 through 172 above as if more fully set forth herein.

266. This is an action for damages in excess of $75,000.00.

267. TESCHENDORF and all Defendants agreed to intentionally participate in a civil conspiracy among themselves, and with other individuals, the purpose of which was to commit (1) violations of Florida's Deceptive And Unfair Trade Practices Act, FLA. STAT. § 501.201, et seq. (2) False Advertising Under The Lanham Act, 15 U.S.C. § 1125(a), and (3) the tort of Tortious Interference With Advantageous Business Relationships.

268. Throughout the course of the conspiracy, TESCHENDORF and all Defendants are acting in concert, coordinated in furtherance of the common scheme.

269. TESCHENDORF knew of the scheme and assisted in it for all of the acts of all Defendants/coconspirators, including, engaging in unconscionable, unfair, and deceptive acts or practices that offend established public policy and are immoral, unethical, oppressive, unscrupulous, or substantially injurious to consumers, that are likely to deceive a consumer acting reasonably in the same circumstances, and that caused injury or detriment to consumers; making false or misleading descriptions of fact and false or misleading representations of fact, that in commercial advertising or promotion, misrepresented the characteristics, qualities, and the reputation of HALES in HALES' commercial activities; and despite knowledge of the customer's contractual and business relationship with HALES, intentionally and without valid justification interfering with such relationships.

270. TESCHENDORF is jointly and severally liable for the acts of the other members of the conspiracy which were committed in furtherance of the conspiracy.

271. TESCHENDORF agreed to launch a campaign to damage HALES, as evidenced by TESCHENDORF’s actions.

272. As a result of the conspiracy, HALES suffered damages.

WHEREFORE, HALES respectfully requests that the Court enter judgment in its favor and against TESCHENDORF, jointly and severally with all Defendants.

COUNT 14– CIVIL CONSPIRACY (RAYMOND)

273. HALES realleges and reincorporates the allegations contained in paragraphs 1 through 6, paragraphs 18 through 54, paragraphs 155-161, and paragraphs 165 through 172 above as if more fully set forth herein.

274. This is an action for damages in excess of $75,000.00.

275. RAYMOND and all Defendants agreed to intentionally participate in a civil conspiracy among themselves, and with other individuals, the purpose of which was to commit (1) violations of Florida's Deceptive And Unfair Trade Practices Act, FLA. STAT. § 501.201, et seq. (2) False Advertising Under The Lanham Act, 15 U.S.C. § 1125(a), and (3) the tort of Tortious Interference With Advantageous Business Relationships.

276. Throughout the course of the conspiracy, RAYMOND and all Defendants are acting in concert, coordinated in furtherance of the common scheme.

277. RAYMOND knew of the scheme and assisted in it for all of the acts of all Defendants/coconspirators, including, engaging in unconscionable, unfair, and deceptive acts or practices that offend established public policy and are immoral, unethical, oppressive, unscrupulous, or substantially injurious to consumers, that are likely to deceive a consumer acting reasonably in the same circumstances, and that caused injury or detriment to consumers; making false or misleading descriptions of fact and false or misleading representations of fact, that in commercial advertising or promotion, misrepresented the characteristics, qualities, and the reputation of HALES in HALES'

commercial activities; and despite knowledge of the customer's contractual and business relationship with HALES, intentionally and without valid justification interfering with such relationships.

278. RAYMOND is jointly and severally liable for the acts of the other members of the conspiracy which were committed in furtherance of the conspiracy.

279. RAYMOND agreed to launch a campaign to damage HALES, as evidenced by RAYMOND's actions.

280. As a result of the conspiracy, HALES suffered damages.

WHEREFORE, HALES respectfully requests that the Court enter judgment in its favor and against RAYMOND, jointly and severally with all Defendants.

COUNT 15 – CIVIL CONSPIRACY
(LUTHMANN)

281. HALES realleges and reincorporates the allegations contained in paragraphs 1 through 6, paragraphs 18 through 54, paragraphs 162-169, and paragraphs 165 through 172 above as if more fully set forth herein.

282. This is an action for damages in excess of $75,000.00.

283. LUTHMANN and all Defendants agreed to intentionally participate in a civil conspiracy among themselves, and with other individuals, the purpose of which was to commit (1) violations of Florida's Deceptive And Unfair Trade Practices Act, FLA. STAT. § 501.201, et seq. (2) False Advertising Under The Lanham Act, 15 U.S.C.

§ 1125(a), and (3) the tort of Tortious Interference With Advantageous Business Relationships.

284. Throughout the course of the conspiracy, LUTHMANN and all Defendants are acting in concert, coordinated in furtherance of the common scheme.

285. LUTHMANN knew of the scheme and assisted in it for all of the acts of all Defendants/coconspirators, including, engaging in unconscionable, unfair, and deceptive acts or practices that offend established public policy and are immoral, unethical, oppressive, unscrupulous, or substantially injurious to consumers, that are likely to deceive a consumer acting reasonably in the same circumstances, and that caused injury or detriment to consumers; making false or misleading descriptions of fact and false or misleading representations of fact, that in commercial advertising or promotion, misrepresented the characteristics, qualities, and the reputation of HALES in HALES' commercial activities; and despite knowledge of the customer's contractual and business relationship with HALES, intentionally and without valid justification interfering with such relationships.

286. LUTHMANN is jointly and severally liable for the acts of the other members of the conspiracy which were committed in furtherance of the conspiracy.

287. LUTHMANN agreed to launch a campaign to damage HALES, as evidenced by LUTHMANN’s actions.

288. As a result of the conspiracy, HALES suffered damages.

WHEREFORE, HALES respectfully requests that the Court enter judgment in its favor and against LUTHMANN, jointly and severally with all Defendants.

COUNT 16– VIOLATION OF FLORIDA'S SEXUAL CYBERHARASSMENT LAW, FLA. STAT. § 784.049 (LUTHMANN)

289. Mr. HALES realleges and reincorporates the allegations contained in paragraphs 1 through 6, paragraphs 18 through 54, paragraphs 162-169, and paragraphs 165 through 172 above as if more fully set forth herein.

290. This is an action for damages of $370,000.00.

291. Florida law prohibits "sexual cyberharassment," which is defined as the publication of "a sexually explicit image of a person that contains or conveys the personal identification information of the depicted person to an Internet website without the depicted person's consent, for no legitimate purpose, with the intent of causing substantial emotional distress to the depicted person." F.S.A. § 784.049(2)(c).

292. Florida's Sexual Cyberharassment law applies if any conduct that is an element of the offense, or any harm to the depicted person resulting from the offense, occurs within the state. § 784.049(7).

293. LUTHMANN published numerous sexually explicit images (via video) of Mr. HALES online via a URL.

294. The images published by LUTHMANN conveyed the personal identification of HALES' owner/agent (Mr. HALES) by depicting his "unique physical representation."

295. HALES' owner/agent(Mr. HALES)'s physical attributes were readily identifiable in the posted images.

296. Further, HALES' owner/agent (Mr. HALES) was specifically identified by name in the URL that contained his images.

297. HALES' owner/agent (Mr. HALES) never consented to the publication of the images.

298. There was no legitimate reason for posting HALES' owner/agent(Mr. HALES)'s intimate images.

299. By disseminating the intimate images LUTHMANN intended to cause substantial emotional distress to HALES' Chairman (Mr. HALES). Mr. HALES was subjected to harassment, experienced fear, endured extreme embarrassment, lost professional opportunities and prestige, felt strain on his personal relationships, and encountered prolonged expense and inconvenience as a result of LUTHMANN's sexual cyberharassment.

300. As a result of LUTHMANN's violation of Florida Statute § 784.049, Mr. HALES is entitled to and demands all appropriate relief, including injunctive relief prohibiting LUTHMANN from engaging in further cyber sexual harassment and

ordering LUTHMANN to destroy all copies of any sexually explicit images depicting Mr. HALES, in LUTHMANN's possession, monetary damages to include $5,000 or actual damages incurred as a result of the violation of this section, whichever is greater, and reasonable attorney fees and costs.

WHEREFORE, Mr. HALES respectfully requests relief against LUTHMANN as follows:

1. A preliminary and permanent injunction prohibiting LUTHMANN from posting or otherwise disseminating the photographs at issue pursuant to Florida Statute § 784.049(5)(a).

2. Compensatory damages in an amount to be proven at trial, in an amount no less than $90,000.00 exclusive of costs, attorneys' fees and interest.

3. Statutory damages pursuant to Florida Statute § 784.049(5)(b).

4. Attorney's fees pursuant to Florida Statute § 784.049(5)(c).

5. Costs of suit.

6. Interest on all compensatory, statutory, and exemplary damages. And

7. Together with such and further relief that this Court may deem just and necessary.

DEMAND FOR JURY TRIAL

HALES and Mr. Hales demand a trial by jury on all issues so triable.

Respectfully submitted,

SHOCHET LAW GROUP
Attorneys for Jeremy B. Hales
409 N. Main Street
Trenton, FL 32693
By: /s/ Randall Shochet
Randall Shochet, Esq.
FBN.: 959421
attorneys@counsel.insure

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 28, 2025, I electronically filed the foregoing document with the Clerk of Court using CM/ECF. I also certify that the foregoing document is being served on this day on all counsel of record, via email to the Service List below.

By: /s/ *Randall Shochet*
Randall Shochet, Esq.

SERVICE LIST

Bruce Matzkin, Esq., pro se

Lynette Michelle Lacy Alexis Preston, pro se

John Cook, pro se

Marla Hughes, pro se

Christopher Joseph Gage
Banker Lopez Gassler PA
Attorney for HELM
501 E KENNEDY BLVD, STE 1700
TAMPA, FL 33602
service-cgage@bankerlopez.com