

IN THE CIRCUIT COURT OF 9<sup>TH</sup> JUDICIAL CIRCUIT OF  
ORANGE COUNTY, FLORIDA

LESLIE FERDERIGOS,  
Plaintiff,  
v.

Case No. 2025-CA-004528

JEREMY HALES,  
ELEPHANT SHOE, LLC.  
MARTHA GEORGE RIZK, (aka GEORGE HALES)  
JASON HIPHER (aka "JAYHIP"),  
MEGAN M. FOX (aka, MEGAN FOX),  
MATTHEW LEWIS (aka "THAT UMBRELLA GUY")  
JOHN DOE (aka "SHIZZYWIZNUT")  
and JOHN/JANE DOES 1-10,  
Defendants.

**PLAINTIFF'S MOTION TO AMEND COMPLAINT**

COMES NOW, Plaintiff, LESLIE FERDERIGOS, by and through undersigned counsel pursuant to Florida Rule of Civil Procedure 1.190 and applicable Florida law, hereby moves this Honorable Court for leave to amend the Complaint, and states as follows:

1. Plaintiff originally filed the Complaint on May 19, 2025. And the Plaintiff refiled her first amended complaint on May 26, 2025.
2. To date, Defendants have not been served with process, and no summons has been signed or returned by the Clerk of Court for any Defendant.
3. Since the filing of the original Complaint, Plaintiff has become aware of ongoing actions by additional parties who are involved in the matters at issue, as well as newly discovered evidence material to the claims and defenses in this case.
4. Florida Rule of Civil Procedure 1.190(a) provides that a party may amend a pleading by leave of court, and that leave shall be freely given when justice so requires. The Florida

Supreme Court has recognized that amendments should be liberally allowed to permit the determination of claims on their merits rather than on procedural technicalities. See *State Farm Fire & Casualty Co. v. Palma*, 629 So. 2d 830, 832 (Fla. 1993).

5. Allowing the amendment will promote judicial economy and avoid multiplicity of suits by ensuring all related claims and parties are properly before the Court.
6. Plaintiff's proposed Amended Complaint, attached hereto as Exhibit A, adds claims and parties based on newly discovered facts and ongoing conduct that are integral to this litigation.
7. This motion is made in good faith and not for the purpose of undue delay or prejudice to any party.

WHEREFORE, Plaintiff respectfully requests that this Court:

- a) Grant Plaintiff leave to file the Amended Complaint attached as Exhibit A;
- b) Order that service of process be allowed on the additional parties named therein; and
- c) Grant any other relief the Court deems just and proper.

**CERTIFICATE OF SERVICE**

WE DO CERTIFY, that a copy of the foregoing has been furnished electronically with the Clerk of Courts by using the EPORTAL system, all parties of record.

Respectfully submitted,

6/15/25  
Dated

/s/ Michael Ferderigos  
Michael Ferderigos, Esq.  
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and JOHN/JANE DOES 1-10,  
Defendants.

**2nd AMENDED COMPLAINT AND DEMAND FOR JURY TRIAL**

Plaintiff, LESLIE FERDERIGOS, by and through undersigned counsel, alleges as follows for  
her Complaint against Defendants:

**VENUE AND JURISDICTION**

1. This is an action for damages in excess of \$75,000.00, exclusive of interest, costs, and attorneys' fees, and is within the jurisdiction of the Circuit Court of the Ninth Judicial Circuit in and for Orange County, Florida.
2. Venue is proper in Orange County, Florida because the acts and omissions giving rise to these claims occurred in substantial part in this County, as the action took place in Orange County, Florida



## **PARTIES**

1. PLAINTIFF, LESLIE FERDERIGOS, is an individual residing in Orange County, Florida.  
At the time the online attacks against her began, she was not a reporter and had no intention of building a significant following on YouTube. Furthermore, her channel, which had only seven subscribers, was used solely for posting videos to share links with friends and family. PLAINTIFF earns a living by assisting her husband with legal research and drafting at his law firm and by providing legal research and paralegal services to licensed Florida attorneys as a retired attorney. Additionally, it is public record that PLAINTIFF, is an ADA protected class.
2. DEFENDANT, JEREMY HALES, is an individual domiciled in Summit County, Ohio. He owns and operates a YouTube channel with over 730,000 followers, and is considered a public figure, is monetized where he receives money from his LIVE streams and video publications. His content is primarily made up of personal lawsuits, disputes with neighbors, and storage auctions. He is considered at the top of this scheme, where he secures those below him high view counts for attacking those adversarial to his position, while promoting his narrative. He is the main ringleader behind the attack on the PLAINTIFF.
3. Defendant, MARTHA GEORGE RIZK, also known as “GEORGE HALES” (“Rizk”), is an individual believed domiciled at 351 SW State Road 24, Otter Creek, Florida, Levy County, Florida. Defendant, MARTHA GEORGE RIZK, is considered a public figure, is monetized where he receives money from her LIVE streams and video publications she does with DEFENDANT HALES. DEFENDANT RIZK is a frequent collaborator and romantic partner of DEFENDANT HALES, and regularly appears on Hales’s YouTube

channel, related social media platforms, and is considered partners with. Rizk, under the alias “George Hales,” has participated in the creation, publication, and dissemination of false and defamatory statements about Plaintiff, and has engaged in coordinated online harassment as further described herein.

4. MATTHEN LEWIS (aka “THAT UMBRELLA GUY”), domiciled in Tennessee, is considered a public figure, is monetized where he receives money from his LIVE streams and video publications, who works directly with DEFENDANT HALES, who ensures as long as he reports in favor of DEFENDANT HALES, he will not be ostracized publicly and will secures high views counts for his favorable LIVE stream discussions about DEFENDANT HALES.
5. MEGAN M. FOX (aka, MEGAN FOX), domiciled at Naples, NY, holds herself publicly as an investigative reporter, who works directly with DEFENDANT HALES.  
  
DEFENDANT FOX, is considered a public figure, who is monetized where she receives money from her LIVE streams and video publications, who works directly with DEFENDANT HALES, who ensures DEFENDANT FOX, as long as she reports in favor of DEFENDANT HALES, she will not be ostracized publicly and will secures high views counts for her favorable LIVE stream discussions about DEFENDANT HALES.
6. JOHN DOE (aka “SHIZZYWIZNUT”) domiciled unknown, holds himself publicly as a YouTube influencer. DEFENDANT SHIZZY is considered a public figure, who is monetized where he receives money from his LIVE streams and video publications, who works directly with DEFENDANT HALES, who ensures DEFENDANT SHIZZY, as long as he reports in favor of DEFENDANT HALES, he will not be ostracized publicly

and will secure high views counts for his favorable LIVE stream discussions about DEFENDANT HALES.

7. JASON HIPSHER (aka "JAYHIP"), domiciled in Omaha, Nebraska, holds himself publicly as a YouTube influencer. DEFENDANT HIP is considered a public figure, who is monetized where he receives money from his LIVE streams and video publications, who works directly with DEFENDANT HALES, who ensures DEFENDANT HIP, as long as he reports in favor of DEFENDANT HALES, he will not be ostracized publicly and will secure high views counts for his favorable LIVE stream discussions about DEFENDANT HALES.
8. DEFENDANT, ELEPHANT SHOES, LLC, is a business the Defendant, Jeremy Hales, owns that operates and holds his profits derived from his YouTube Channel and is registered in Florida.
9. DEFENDANTS JOHN/JANE DOES 1-10 are individuals whose identities are presently unknown but who participated in the publication and dissemination of defamatory statements as described herein.

#### **BACKGROUND OF DEFENDANT HALES & HIS YOUTUBE CHANNEL**

10. DEFENDANT HALES, content is built on provoking controversy with 2nd parties and has led to Injunctions for protection by various targeted 2nd parties, including his neighbors, in which the DEFENDANT HALES and DEFENDANT RIZK publicly mock members of the public on published LIVE streams and videos, as well as, showing up and videoing themselves trespassing on their neighbor's property. DEFENDANT HALES, has repeatedly been reported to violate past stalking injunctions, having no regard to the law.

**EXHIBIT B:** *Example of Defendant Hales violating stalking injunctions against him.*



Office of Governor Ron DeSantis

<https://www.flgov.com/files/executive-orders> PDF

**STATE OF FLORIDA**

**Jeremy Hales** for violations of a stalking injunction and temporary injunction; and. WHEREAS, the Honorable BRIAN S. KRAMER has also advised the Governor that ...

11. Many viewers find his content obnoxious, as he often disparages, humiliates, and mocks neighbors and opposing attorneys involved in lawsuits against him by mocking their physical appearance, religious backgrounds, age, and other personal traits. His audience is primarily rural ages 45-75 years old, compiled of both males and females, additionally pulling a large international audience as well, which he selects various international fans to launch online harassment campaigns against those who oppose DEFENDANT HALES.

**EXHIBIT A:** *Example of thumbnails he uses to entice viewers of his videos, where he depicts neighbors and adversarial attorneys in a false and disparaging light. This has led to attorneys refusing to represent parties to avoid the public online harassment campaigns.*



BAD NEIGHBORS, BAD LAWYER & BAD COPS - Odder Creek Update

45K views · Streamed 1 month ago

What The Hales

BAD NEIGHBORS, BAD LAWYER & BAD COPS - Odder Creek and Court Update OTTER CREEK, FL PUBLISHED ON: 04.24.2025



BAD LAWYER DENIED AGAIN - Court Update

56K views · Streamed 2 days ago

What The Hales

BAD LAWYER DENIED AGAIN - Court Update Bad Lawyers Everywhere OTTER CREEK, FL PUBLISHED ON: 05.04.2025



BAD LAWYER WAS FIRED - Federal Court Update

59K views · Streamed 1 month ago

What The Hales

BAD LAWYER WAS FIRED - Federal Court Update Bad Lawyers Everywhere OTTER CREEK, FL PUBLISHED ON: 04.24.2025



BAD LAWYER BULLIED LAWYER - Court Update

53K views · Streamed 2 weeks ago

What The Hales

BAD LAWYER BULLIED LAWYER - Court Update Bad Lawyers Everywhere OTTER CREEK, FL PUBLISHED ON: 04.24.2025

## INTRODUCTION TO THE ORCHESTRATED ATTACK AGAINST THE PLAINTIFF

12. This action arises from a deliberate, coordinated campaign of online harassment, defamation, and reputational sabotage orchestrated by DEFENDANT HALES and his associates, including, but not limited to, DEFENDANT(S) RIZK, FOX, JAY HIP, LEWIS, & SHIZZY, International 2nd parties, and others.

13. PLAINTIFF, a retired attorney who now assists her husband's law firm, became the target of this campaign after participating in a neutral interview regarding ongoing litigation involving DEFENDANT HALES. What began as a single Facebook post the PLAINTIFF notified her acquaintance about, escalated rapidly, as DEFENDANT(S) weaponized their significant online following to publish and amplify hundreds of false, malicious statements about PLAINTIFF.
14. These attacks, carried out across public Facebook groups and live YouTube broadcasts, included defamatory claims about PLAINTIFF's professional status, personal life, and mental health, and were calculated to destroy her reputation and livelihood.
15. Despite PLAINTIFF's repeated efforts to correct the record and halt the harassment—including providing sworn affidavits from the Florida Bar—DEFENDANT(S) persisted, recruiting followers, encouraging hate sites, and profiting from live donations rooted in the continued dissemination of these falsehoods. The conduct at issue has caused severe, ongoing harm to PLAINTIFF's personal and professional life, necessitating judicial intervention and redress.

#### **INTRODUCTION TO DEFENDANT(S) SUBSCRIBER SCHEME**

16. DEFENDANT(S) are misleading the public while presenting themselves as advocates for transparency and truth. DEFENDANT HALES has orchestrated a concerted scheme designed to manipulate viewership analytics, silence dissent, and financially benefit those who participate in his campaign. This operation is not a matter of speculation—it is a calculated effort that rewards loyalty to DEFENDANT HALES with inflated followers,

increased visibility, and monetary compensation, while punishing those who refuse to participate.

17. Data analysis shows that creators who align themselves with DEFENDANT HALES, including DEFENDANT(S) FOX, LEWIS, HIP, RIZK, SHIZZY, have experienced dramatic spikes in their online metrics, increasing from 30,000+ view counts, compared to their typical view counts soon after joining his circle and promoting his narrative. This is not mere coincidence. The evidence indicates that these creators have been incentivized to support DEFENDANT HALES', agenda and, in return, have reaped significant online and financial benefits. Those who decline to participate or who attempt to expose the scheme have faced targeted harassment, defamation, and orchestrated attacks intended to damage their reputations and silence their voices. Additionally, DEFENDANT HALES, has taken measures to contact DCF to file false reports, contact victims estranged family members, filing lawsuits to muddy the water to the Courts. This is evidenced in voluminous filed pending cases across Florida and in Ohio.
18. This pattern of behavior extends beyond simple online rivalry. It constitutes a systematic campaign to manipulate public opinion and stifle free expression. The coordinated use of fake accounts, cyber harassment, and intimidation tactics demonstrates an intention to suppress dissent and maintain control over the narrative. The goal is not just personal profit, but the creation of an environment where truth-telling is punished and misinformation is rewarded.
19. Additionally, DEFENDANT HALES, work directly with the DEFENDANT(S) to secure various false narratives are pushed throughout the DEFENDANTS' LIVE Streams with

the intention of discrediting any 2nd parties questioning the actions of DEFENDANT HALES.

20. The consequences of this scheme are far-reaching. When public discourse is subject to manipulation through coordinated misinformation and intimidation, the integrity of online platforms—and by extension, the rights of individuals to express themselves freely—is fundamentally undermined. This is not merely “YouTube drama”; it is a matter of public concern that warrants legal scrutiny and redress.

21. Evidence supporting these claims includes timelines, digital communications, and analytics data that clearly illustrate the existence and operation of this scheme. While some material is reserved for ongoing litigation, the available public evidence is sufficient to establish a pattern of conduct that is both deliberate and damaging. The public deserves transparency, and those responsible for orchestrating and benefiting from such schemes must be held accountable.

22. It is essential for the court to recognize the seriousness of this conduct and its impact on both individuals and the broader public. Only through legal action can we ensure that those who manipulate, intimidate, and profit at the expense of honest discourse are brought to justice. The pursuit of truth and the protection of free expression depend on the willingness to expose and address such schemes wherever they appear.

### **FACTS**

23. **On or about April 26, 2025**, PLAINTIFF, a retired lawyer who assists her husband with his law firm and is not in the business of reporting, observed a disturbing post on Facebook concerning a mutual acquaintance who was an investigative reporter. Out of concern,



PLAINTIFF notified the acquaintance about the post. Subsequently, the acquaintance requested that PLAINTIFF interview him regarding lawsuits filed by DEFENDANT HALES, as PLAINTIFF was a retired attorney who could better understand the legal issues.

24. At the acquaintance's request, PLAINTIFF also attempted to contact another reporter, DEFENDANT FOX, who holds herself to be an investigative reporter, often providing legal commentary on public issues and who had previously reported favorably on issues involving DEFENDANT HALES, seeking to present a balanced perspective.
25. **On April 27, 2025,** PLAINTIFF emailed DEFENDANT FOX to schedule an interview but received no response.
26. **On April 29, 2025,** PLAINTIFF conducted the initial interview with the acquaintance, maintaining neutrality and objectivity throughout. Subsequently, the PLAINTIFF, conducted a 2<sup>nd</sup> interview the following week with her acquaintance and a Defendant in DEFENDANT HALES' Federal Lawsuit, maintaining neutrality and posing questions to the acquaintance in his capacity as a reporter and the Defendant to DEFENDANT HALES' lawsuit reasons he believes DEFENDANT HALES was suing him, which including him sharing a satirical video he had published about DEFENDANT HALES and DEFENDANT FOX.
27. The PLAINTIFF uploaded these interviews on her small YouTube channel, with (7) seven subscribers as family and friends, she used to share links with and gave her acquaintance the link, along with the original downloaded interviews, for his use.

28. **On or about May 5, 2025,** Plaintiff's acquaintance, undisclosed to Plaintiff until after it was published, published the initial interview with only the Plaintiff and her acquaintance in a Facebook group titled "What the Hales." [EXHIBIT A – timeline exhibits]
29. **On or about May 6, 2025,** International fan of DEFENDANT HALES, Ania Waterman, who also was in contact with DEFENDANT HALES, began targeting and attacking PLAINTIFF online, specifically in the Facebook group titled "What the Hales", using DEFENDANT HALES logo. Furthermore, DEFENDANT HALES later makes written statements during various DEFENDANT(S) live broadcasts that PLAINTIFF was sending Ania Waterman harassing emails. [EXHIBIT A – Timeline]
30. **On or about May 13, 2025,** PLAINTIFF is directed to a Facebook public group titled "What the Hales," using DEFENDANT HALES' logo, where she observed herself being attacked by group members who are supporters and followers of Defendants Hales and Rizk, stating she is a "Disbarred Attorney", among other false and harassing comments. It is important to note, Defendant Hales proactively reports any usage of his logo without permission to be taken down and has maintained this Facebook group with over 5,000 members responsible for the online harassment against Plaintiff and others.
31. **From May 5, 2025, until present,** on this Facebook group, false and defamatory statements were published about Plaintiff, including assertions that she was "knocked up by her acquaintance" (despite being a married woman), that she was "an idiot," "mental and off her meds," and that she was "a disbarred attorney," "she is a transexual man" among many other false and harassing comments. These comments exceed hundreds of publications on this public Facebook group, which comes up in Google searches under Plaintiff's legal name, completing ruining her professional credibility across the internet.

The posts, are predominantly, registered as international accounts, containing no true photographs, and only muppet or animal depictions, citing locations in Australia, Ireland, and the UK. [EXHIBIT A – timeline exhibits]

32. **On or about May 15, 2025**, members of the Facebook group continue posting that PLAINTIFF is a disbarred attorney, among voluminous insults and harassment. This has continues to date. Comments imply Plaintiff is a *transsexual*, Plaintiff is *crazy and off her meds*, and *Plaintiff just wants to grow her YouTube channel*. Professional clients began calling PLAINTIFF to inform her they are seeing the online attack against her and feel bad for her. Furthermore, PLAINTIFF's estranged Father drops off a envelope containing these false statements and posts printed out and leaves this on her doorstep for her children to see.
33. Within a day, over 500 people subscribed to PLAINTIFF's YouTube channel and began making berating comments to Plaintiff about being a *failed, disbarred attorney*. Additionally, Plaintiff begins receiving harassing emails from those endorsing Defendant Hales. Plaintiff provided all parties with the sworn affidavit from the Florida Bar, evidencing she retired in "good standing" and could be re-admitted pursuant to approval by the Florida Board of Bar Examiners. However, DEFENDANT(S) continued to falsely state PLAINTIFF retired to evade disbarment and falsely posted the reasons for her retirement. [EXHIBIT A – timeline exhibits][EXHIBIT E]
34. PLAINTIFF witnessed parties DEFENDANT HALE is suing in a federal lawsuit filed by Hales, Case No. 1:25cv58/RH/ZCB, being targeted by this Facebook "hate group" titled "What the Hales" with hateful language, threats, and posts intended to damage their reputations. These included accusations of criminal conduct, ridicule of their appearance,

and anti-Semitic remarks, among other hateful content. Despite voluminous attempts to report made by those being attacked, Facebook to date refuses to take this group down.

[EXHIBIT B – Notice of Google search, etc.]

35. PLAINTIFF was provided with extensive video footage of DEFENDANT HALES and DEFENDANT RIZK, which had been published on Hales's YouTube channel, titled "What the Hales." In these videos, DEFENDANT HALES states he does not file lawsuits for justice against various parties, nor cares about court opinions, but merely files lawsuits solely to keep parties in his lawsuits tied up in court and to "drain and ruin them financially." He selectively goes after parties who cannot afford to sustain attorney fees to litigate against him.

36. Defendant Hales expressly stated that litigation is about destroying the lives of those he sues, and he broadcast these statements and his ridicule of various targeted parties to his audience of over 730,000 followers, resulting in his audience developing extreme hate towards any adversarial party to DEFENDANT HALES based on his false depiction of the narrative and ability to broadcast to over 730,000. It is important to note, the targeted attacks are launched against small YouTube Influencers without the audience that DEFENDANT HALES reaches.

37. Additionally, DEFENDANT HALES' YouTube channel "What the Hales" included thumbnails and video coverage where Hales referred to parties he is suing in his lawsuits as criminals, mocked their appearance, and made anti-Semitic remarks, among other hateful statements.

38. **On or about May 16, 2025**, DEFENDANT FOX, LEWIS, HIP, SHIZZY begin to go live in front of thousands of people, stating and mocking PLAINTIFF as a failed attorney who retired to evade disbarment.
39. PLAINTIFF was subsequently invited by YouTube reporters, and appears in interviews on their LIVE Broadcasts to provide statements contrary to DEFENDANT HALES false narrative. These YouTube reporters were also named as defendants in Defendant Hales' federal lawsuits, where DEFENDANT HALES makes claims against them for simply having adversarial opinions against him, as he attempts to silence them from publishing their opinions.
40. Following Plaintiff's participation in these interviews, the Facebook group "What the Hales" continued publishing false written statements that Plaintiff was a disbarred attorney and made fun of her appearance, among other insults. These publications continue to date.
41. **On or about May 16, 2025**, in response to the attacks, and Facebook's refusal to take down this hate group and in hopes it would get them to stop. Plaintiff began to create a satirical video series called the "HoDunk Hillbillies" and gives these videos to YouTube Reporters being sued by DEFENDANT HALES, to use as needing after witnessing how they were all being attacked by DEFENDANT HALES and his supporters. These satirical videos, to depict how the PLAINTIFF was viewing this situation and attacks against her and others, excluding names and making it clear it was satire depicting adversarial positions to DEFENDANT HALES.
42. **On May 18, 2025**, DEFENDANT HIP hosted a live YouTube broadcast during which he mocked PLAINTIFF's appearance, branded her with the name "Lips", and falsely stated

that she retired to avoid disbarment. This LIVE stream was conducted with DEFENDANT FOX and guests made monetary donations throughout.

43. **On May 19, 2025,** the following day DEFENDANT HALES and DEFENDANT RIZK hosted a live video on their YouTube channel in front of an audience over 730,000, soliciting and receiving donations, while publishing false statements about PLAINTIFF, including the claim that she retired only to avoid disbarment. During this same week, DEFENDANT HIP participated and discussed PLAINTIFF, repeating defamatory statements. Immediately following this live broadcast, PLAINTIFF emailed DEFENDANT HALES and DEFENDANT HIP a *cease-and-desist* letter, attaching an affidavit from her state bar confirming that her retirement from legal practice was not to avoid disbarment. Defendant Hales responded, “*See you in Court.*”
44. **On May 19, 2025,** Plaintiff filed a lawsuit, naming DEFENDANT HALES, RIZK, AND HIP. Subsequently, PLAINTIFF amends this lawsuit to add DEFENDANT FOX and LEWIS, after sending a *cease-and-desist* in which DEFENDANT FOX responded by calling the attorney a “Dummy.” [EXHIBIT B – Notice of Google search, etc.]
45. **On or about May 21, 2025,** hate groups mocking Plaintiff were created on Facebook, where Plaintiff’s physical appearance was mocked, with her name tagged publicly. DEFENDANT FOX hosted a live broadcast making a mockery out of Plaintiff’s lawsuit against everyone, encouraging an audience participation, while posting personal family law cases involving Plaintiff and with Plaintiff’s photograph. [EXHIBIT C]
46. **On or about May 21, 2025,** during DEFENDANT HIP live broadcast with DEFENDANT FOX, DEFENDANT HALES made it known he was watching and participated through written comments. The broadcast included several jabs and references directed at someone

described as a “disbarred” attorney. Jeremy Hales made a remark: “it's amazing how the felons, disbarred, wig-wearing, Botox, botched plastic surgery people flock together,” clearly lumping the “disbarred” person in with a group he’s mocking. There was also a live chat comment referring to “the disbarred Florida attorney,” further singling out Plaintiff. Regarding “lips,” the conversation turned to mocking someone nicknamed “Legally Liable Lips,” joking she used to work as a puppet or a Muppet, specifically comparing her to Janice from the Muppets, and stating her character was made to look just like her, calling it “uncanny” and a “disservice to the Muppets,” clearly using “lips” as a target for ridicule related to her appearance and possibly manner of speaking. During this LIVE Stream, DEFENDANT HIP received several monetary donations, as commentary was being discussed about the PLAINTIFF and her photograph with on the center screen.

47. **From May 21, 2025, until May 27, 2025,** Plaintiff became debilitated, depressed, and almost hospitalized due to all defendant(s) actions which exacerbated by her ADA protected disability, which was public record and the DEFENDANTS were aware of. In an attempt to ignore and vanish from the online harassment, the Plaintiff deleted every one of her social media accounts to evade the attack. However, the DEFENDANT(S) continued to attack her on multiple social media forums during live and Facebook posts and emails directly sent to her work email following her attempt to vanish. [EXHIBIT A – Timeline]
48. **On or about May 26, 2025,** and subsequent to PLAINTIFF filing her initial complaint against DEFENDANTS HALES, RIZK, HIP, FOX, LEWIS, AND SHIZZY, begin publishing comments about PLAINTIFF’s private life for an audience on YouTube and continued to promote the narrative that PLAINTIFF is a disbarred attorney. They continued to publish daily broadcasts in which they insulted, belittled, demeaned, and made false

statements about PLAINTIFF, spending the majority of their broadcasts discussing PLAINTIFF's life, referring to PLAINTIFF as being "mental, crazy, off her meds, a crazy bitch," etc.

49. DEFENDANT FOX falsely stated that PLAINTIFF created revenge porn about DEFENDANT FOX, resulting in Plaintiff receiving voluminous hate emails to her work.[1] <sup>1</sup>

50. **On May 27, 2025,** At this point, PLAINTIFF amended her complaint to add Megan Fox and Matthew Lewis after witnessing them making statements to imply she retired to evade disbarment.

51. **On May 27, 2025,** After recovering from severe depression, due to the online harassment, PLAINTIFF opened a YouTube channel for the purpose of having her own voice against those who were attacking her. PLAINTIFF began making light hearted satirical videos mocking those who were attacking and spreading false statements about her, in an effort to handle the attack against her. [EXHIBIT A – Timeline]

52. All DEFENDANTS recruited supporters and followers to create online "hate sites" about PLAINTIFF and continued to harass PLAINTIFF daily through these social media posts, hate sites, and YouTube live streams. All DEFENDANTS assisted and recruited followers to alter Plaintiff's photographs—making her appear as a clown, with exaggerated lips—and located childhood pictures of Plaintiff, which they used to further mock her appearance. PLAINTIFF was branded by the name "LIPS" and "LEGALLY LIPS across

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<sup>1</sup> [1] The revenge porn referenced was created by a third party and was publicly mentioned in a federal lawsuit and public record. Plaintiff merely conducted an interview with her acquaintance and a defendant in Defendant's federal lawsuit and asked them about the allegations against them, which is how the video was discussed and brought up. Additionally, the video in question was satire and not considered revenge porn nor does it show anything that could be considered porn. Despite this, as soon as Defendant Fox made Plaintiff aware she did not approve of the video on May 19, 2025, Plaintiff deleted the interview and never reposted the interview.



voluminous forums and referred to such name during DEFENDANT(S) live streams.” All Defendants profited pursuant to live donations they received during these live streams, using Plaintiff’s image, reporting on Plaintiff’s private life, personal information, false statements, and using international third parties to harass Plaintiff all over the internet, essentially ruining her online reputation and professional image.

53. **On or about June 3, 2025,** supporters of Hales, through the Facebook site titled “What the Hales”, using DEFENDANT HALES logo, that he was aware of and profiles in contact with him, began to harass Plaintiff’s children and family. [EXHIBIT A – Timeline]
54. **On June 7, 2025,** Australian, Fan and YouTube influencer DJ Rattis, who is endorsed by DEFENDANT HALES and makes money from his YouTube channel, published a video where he used PLAINTIFF’s image and voice and created a false interview depicting her in a demeaning light, while tagging her legal name as the heading. [EXHIBIT A – Timeline]
55. PLAINTIFF reported this to YouTube. However, nothing was taken down. In response to no remedy, PLAINTIFF created a satirical video tagging DJ Rattis’ name and challenging him to a dance off to try and make humor from the situation. DJ Rattis then created an insulting song where he published it, using PLAINTIFF’s name, while calling her a fail, loser, among other insulting language. [EXHIBIT A – Timeline]
56. **On or about June 5, 2025,** PLAINTIFF reached out to DEFENDANT HIP in an attempt to settle everything and to gain confirmation that he and others would not keep falsely reporting about the status of her retirement. In this conversation, she said insults are one thing, but false statements affecting her professional reputation and livelihood cannot be tolerated because she works for her husband’s law firm and has clients who are seeing these

posts and questioning whether or not she was disbarred. In this conversation, DEFENDANT HIP informed PLAINTIFF that he is in contact with DEFENDANT FOX and DEFENDANT LEWIS and requested she drop them too. PLAINTIFF stated she would not be dropping the lawsuit, but in good faith, as long as DEFENDANT FOX and DEFENDANT LEWIS would not continue to falsely report about her retirement status, she would drop both of them. After this conversation, PLAINTIFF voluntarily dismissed claims against DEFENDANT HIP, FOX, and LEWIS. [EXHIBIT A – Timeline] However, the following week they continued to falsely report about PLAINTIFF’s retirement status. However, shortly after this and relying on DEFENDANT HIP securing false statements would not continue to circulate, DEFENDANT(S) came in with a harder attack against the PLAINTIFF.

57. **On or about June 7, 2025,** International fan who was in direct contact with DEFENDANT HALES, Ania Waterman, sent an email harassing PLAINTIFF, to which Plaintiff responded civilly, trying to get her to stop. After PLAINTIFF agreed to apologize because Ania Waterman told Plaintiff she had autism, Ania Waterman began posting publicly deranged pictures of herself in the Facebook Group, “What the Hales”, clearly intended to make Plaintiff appear as if she was picking on a vulnerable person. [EXHIBIT A – Timeline]
58. **From or about May 27, 2025, until present,** DEFENDANT FOX and LEWIS continue to report that Plaintiff retired to evade disbarment, despite being emailed the Florida Bar’s sworn affidavit that evidences this is false. DEFENDANT FOX claimed she spoke to the Florida Bar and that PLAINTIFF retired to evade disbarment. She proceeded to call Plaintiff a “crazy bitch,” and both she and DEFENDANT LEWIS make comments about

PLAINTIFF's mental health, claiming she is off her meds and crazy. [EXHIBIT A – Timeline]

59. PLAINTIFF's reputation online has been completely ruined as a professional. [See EXHIBIT B]

60. DEFENDANT HALES refuses to be noticed in the aforementioned case as to the evidence and continues to tell the clerk of court to take him off the e-service list, claiming he is an interested party/attorney, failing to tell the clerk of court he is a named defendant. [Exhibit D]

61. To date, PLAINTIFF continues to receive harassing emails and has suffered substantial damages in result of the DEFENDANTS actions. [EXHIBIT E]

62. PLAINTIFF incorporates by reference all Notices filed containing exhibits of evidence in support of this 2nd Amended Complaint.

#### **CAUSE OF ACTION:**

##### **COUNT I(A): DEFAMATION (LIBEL AND SLANDER)** **(Against Defendants Hales, Rizk, Hip, Fox, Umbrella Guy, Shizzywiznut, and Others)**

53. Plaintiff realleges and incorporates by reference paragraphs 1 through 52 as if fully set forth herein.

54. Defendants Hales, Rizk, Hip, Megan Fox, Umbrella Guy, Shizzywiznut, and other individuals identified in the preceding paragraphs, acting individually and in concert, intentionally published and/or republished false and defamatory statements about Plaintiff across multiple social media platforms, including but not limited to Facebook and YouTube.

55. On or about April 26, 2025, Plaintiff, a retired attorney assisting her husband's law firm and not in the business of reporting, became involved in an interview at the request of a mutual acquaintance, an investigative reporter, regarding lawsuits filed by Defendant Hales. Plaintiff maintained neutrality and objectivity during the interview and sought, at the acquaintance's request, to include Defendant Fox to ensure a balanced perspective.
56. On or about May 5, 2025, this interview was published without Plaintiff's prior knowledge in the Facebook group "What the Hales," a group maintained by Defendant Hales and known for targeting individuals involved in litigation with him.
57. Shortly thereafter, beginning on or about May 6, 2025, Defendants and their associates, including Ania Waterman, from Ireland, acting in coordination with Defendant Hales, initiated a coordinated campaign of online harassment and defamation against Plaintiff. This included public statements, both in Facebook groups and live YouTube broadcasts, falsely accusing Plaintiff of harassing behavior, being "knocked up by her acquaintance," "mental and off her meds," and, repeatedly and falsely, being "a disbarred attorney," "retired to evade disbarment" among numerous other derogatory and harassing characterizations.
58. On or about May 13, 2025, Plaintiff discovered that these defamatory and harassing statements were being widely disseminated among members of the "What the Hales" Facebook group, which Defendant Hales controls and in which he has a known practice of enforcing the use of his logo and maintaining a large, active membership. These statements, including the false claim that Plaintiff is a disbarred attorney, have persisted and multiplied, with hundreds of publications visible in Google searches under Plaintiff's legal name.

59. From May 15, 2025, and continuing to date, group members and Defendants further escalated their attacks, publishing additional false statements implying Plaintiff is a transsexual, is “crazy and off her meds,” and suggesting that her professional motivations are fraudulent. These attacks have resulted in Plaintiff’s clients contacting her with concern and confusion, and an influx of online harassment, including hundreds of berating comments and harassing emails from individuals aligned with Defendant Hales, even after Plaintiff provided a sworn affidavit from the Florida Bar substantiating that she was not disbarred.
60. Defendants Hales, Rizk, Hip, Megan Fox, Umbrella Guy, and others, using their respective social media platforms and live broadcasts with substantial audiences, continued to publish, republish, and amplify these false claims. They falsely asserted that Plaintiff retired to evade disbarment, mocked Plaintiff’s appearance and mental health, and accused her of criminal or unethical conduct, including but not limited to accusations of involvement in “revenge porn.” These broadcasts and posts were frequently monetized through live donations and advertising revenue.
61. Defendants acted with actual malice, or at minimum, reckless disregard for the truth. Plaintiff repeatedly provided documentation, including a sworn affidavit from the Florida Bar, disproving the allegations of disbarment and responding to cease and desist requests; nevertheless, Defendants persisted in disseminating the defamatory statements.
62. These false and defamatory statements were published to large, international audiences and have caused significant and ongoing harm to Plaintiff’s personal and professional reputation, subjected her to public ridicule and scorn, resulted in emotional distress, and caused economic harm, including loss of business relationships and clients. The

defamatory conduct has also extended to attacks on Plaintiff's family, including her children, and the creation and proliferation of online "hate sites" utilizing Plaintiff's likeness and personal information to further harm her reputation.

63. As a direct and proximate result of Defendants' actions, Plaintiff has suffered and continues to suffer damages, including but not limited to humiliation, mental anguish, loss of reputation, and economic harm.

WHEREFORE, Plaintiff respectfully requests judgment against Defendants for compensatory and punitive damages, an injunction prohibiting further defamatory statements, costs of this action, and such other relief as the Court deems just and proper.

**COUNT I(B): DEFAMATION PER SE**  
**(Against Defendants Hales, Rizk, Hip, Fox, Umbrella Guy, Shizzlywiznut, and Others)**

Plaintiff realleges and incorporates by reference all preceding paragraphs as if fully set forth herein.

53. Under Florida law, a statement constitutes defamation per se if it imputes to another: (a) a criminal offense amounting to a felony, (b) a presently existing venereal or other loathsome and communicable disease, (c) conduct, characteristics, or a condition incompatible with the proper exercise of a lawful business, trade, profession, or office, or (d) serious sexual misconduct.

54. Defendants Hales, Rizk, Hip, Megan Fox, Umbrella Guy, Shizzlywiznut, and others, individually and acting in concert, repeatedly published and republished false, unprivileged statements of fact regarding Plaintiff, both verbally and in writing, to third parties throughout various social media channels—including but not limited to YouTube broadcasts, Facebook posts, and the public "What the Hales" Facebook group.

55. Defendants' statements included, but were not limited to, assertions that Plaintiff was "a disbarred attorney," that she "retired to avoid disbarment," that she was "knocked up by her acquaintance," "she is a transsexual" and that Plaintiff created "revenge porn," and other statements alleging or implying criminal, unethical, and immoral conduct on the part of Plaintiff. Defendants further mocked Plaintiff's mental health, accused her of professional incompetence and dishonesty, and made repeated derogatory comments about her personal life, appearance, and character.

56. These statements were published to extraordinarily wide audiences, with several of the relevant YouTube channels and Facebook groups boasting hundreds of thousands of subscribers or members, and with content being disseminated internationally and appearing in online search results for Plaintiff's legal name. In particular, the "What the Hales" Facebook group, operated and maintained by Defendant Hales and used as a platform to coordinate online attacks, was a central vehicle for the publication and repetition of these defamatory statements.

57. The statements made by Defendants constitute defamation per se under Florida law because they directly impugn Plaintiff's integrity, ethics, and fitness to practice law and engage in business, and falsely accuse her of conduct incompatible with her profession and of serious sexual misconduct. The repeated assertions that Plaintiff was disbarred, that she retired to evade disbarment, and that she engaged in criminal or morally reprehensible acts, strike at the heart of Plaintiff's reputation as an attorney and a professional.

58. All such statements were false. Plaintiff has never been disbarred, nor did she retire to avoid disbarment. Her retirement from legal practice was voluntary and unrelated to any disciplinary proceeding, as evidenced by the sworn affidavit from her state bar, which was

provided to Defendants. Defendants knowingly ignored this evidence and continued to publish and republish the false statements.

59. Defendants made these statements with actual malice, or at minimum, with reckless disregard for their truth or falsity. Plaintiff repeatedly notified Defendants of the falsity of these claims and provided documentary evidence, yet Defendants persisted in the defamatory conduct.

60. As a direct and proximate result of Defendants' false and defamatory statements, Plaintiff has suffered presumed damages to her professional and personal reputation, standing in the community, severe emotional distress, loss of business and client relationships, and other damages to be proven at trial.

WHEREFORE, Plaintiff demands judgment against Defendants for compensatory and punitive damages, together with costs, interest, and any further relief this Court deems just and appropriate.

#### **COUNT II: INVASION OF PRIVACY**

**(False Light, Public Disclosure of Private Facts, Appropriation, Intrusion Upon Seclusion)**  
**(Against Defendants Hales, Rizk, Hip, Fox, Umbrella Guy, Shizzywiznut, and Others)**

Plaintiff realleges and incorporates by reference all preceding paragraphs as if fully set forth herein.

53. Defendants Hales, Rizk, Hip, Megan Fox, Umbrella Guy, Shizzywiznut, and others, individually and acting in concert, engaged in a sustained campaign of harassment, humiliation, and exploitation of Plaintiff's private life through various social media platforms, including but not limited to Facebook, YouTube, and associated online "hate sites."

#### **A. False Light**



54. Defendants published and widely disseminated statements and content that placed Plaintiff in a false light before the public, including but not limited to: (a) falsely stating that Plaintiff was “knocked up by her acquaintance” despite her marital status; (b) repeatedly claiming Plaintiff was “a disbarred attorney” or that she “retired to avoid disbarment,” despite sworn affidavits from the Florida Bar to the contrary; and (c) falsely accusing Plaintiff of creating “revenge porn.” Referring to the Plaintiff as being a “Transsexual” and “Off her meds” These statements were calculated to subject Plaintiff to public ridicule, contempt, and to mislead the public as to the true facts of Plaintiff’s life and professional standing. Defendants further mocked Plaintiff’s appearance, mental health, and sexual identity, and encouraged their followers to do the same through coordinated group activity and live broadcasts.

55. Defendants knew or acted with reckless disregard as to the falsity of these statements and the damaging, false impression they would create about Plaintiff. Plaintiff repeatedly provided documentation disproving the statements, yet Defendants persisted and amplified the false narrative to hundreds of thousands of viewers and group members.

#### **B. Public Disclosure of Private Facts**

56. Defendants publicized private, non-newsworthy facts about Plaintiff, including details of her marital status, private communications, and aspects of her personal and family life. Defendants repeatedly discussed Plaintiff’s alleged personal relationships, career decisions, health status, and other sensitive matters in public broadcasts and posts accessible to a vast online audience. Defendants also encouraged and facilitated the sharing of Plaintiff’s private information—including childhood photographs and other personal data—across hate groups and social media forums.

57. The public disclosure of these facts, which were not matters of legitimate public concern, would be highly offensive to a reasonable person, and resulted in Plaintiff's clients, acquaintances, and family members being exposed to and contacting Plaintiff about these online attacks. The ongoing exposure of Plaintiff's private life has caused significant embarrassment and distress.

### **C. Appropriation**

58. Defendants, without Plaintiff's consent, used Plaintiff's name and likeness—including altered, humiliating photographs (such as images depicting Plaintiff as a clown, with exaggerated features, or as the character “Legally Lips”), and childhood images—to attract viewers, solicit donations, and drive engagement with their online content. Defendants and their followers exploited Plaintiff's identity to increase the reach of their social media platforms, monetize content, and profit from live donations during broadcasts in which Plaintiff was targeted and ridiculed.

59. Plaintiff's name, likeness, and personal story were deliberately appropriated and exploited by Defendants for their own commercial and reputational benefit, without any legitimate interest or consent from Plaintiff.

### **D. Intrusion Upon Seclusion**

60. Defendants intentionally and egregiously intruded upon Plaintiff's solitude and private affairs by recruiting and encouraging followers to create and maintain “hate sites” dedicated to attacking Plaintiff, orchestrating the mass publication of private images, and engaging in coordinated harassment campaigns. Defendants and their supporters obtained and shared private photographs, including childhood images, without Plaintiff's

authorization, and directly targeted Plaintiff and her family members through harassing emails and public posts.

61. These actions would be highly offensive to a reasonable person and caused Plaintiff to suffer severe emotional distress, humiliation, and the loss of her ability to safely participate in social media or conduct her professional affairs without fear of ongoing harassment and reputational harm. Plaintiff was ultimately compelled to delete all her social media accounts to escape the relentless attacks and preserve her mental health.

62. As a direct and proximate result of Defendants' actions, Plaintiff has suffered substantial damages, including but not limited to mental anguish, loss of reputation, economic harm, diminished professional opportunities, and the loss of enjoyment of life.

WHEREFORE, Plaintiff respectfully requests judgment against Defendants for compensatory and punitive damages, an injunction prohibiting further invasion of privacy, costs of this action, and such other relief as the Court deems just and proper.

**COUNT III: INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS (IIED)**  
**(Against Defendants Hales, Rizk, Hip, Fox, Umbrella Guy, Shizzlywiznut, and Others)**

Plaintiff realleges and incorporates by reference all preceding paragraphs as if fully set forth herein.

53. Defendants Hales, Rizk, Hip, Megan Fox, Umbrella Guy, Shizzlywiznut, and others, individually and in concert, engaged in a prolonged and coordinated campaign of harassment, ridicule, and humiliation directed at Plaintiff through various online and social media platforms, including—but not limited to—Facebook, YouTube, and associated “hate sites.”

54. Beginning on or about May 5, 2025, and continuing to the present, Defendants published and broadcast repeated false and inflammatory statements about Plaintiff, including but not limited to: claims that Plaintiff was “knocked up by her acquaintance” (when Plaintiff is a married woman), assertions that Plaintiff was “a disbarred attorney” or retired solely to avoid disbarment (contrary to official records and sworn affidavits provided by Plaintiff), and accusations that Plaintiff created “revenge porn.” Defendants also discussed and spread false and salacious rumors about Plaintiff’s mental health, gender identity, and career motivations, none of which had any basis in fact.
55. Defendants mocked and ridiculed Plaintiff’s appearance in live broadcasts and group chats, altered photographs of Plaintiff to depict her in a demeaning and humiliating fashion (including images portraying Plaintiff as a clown or with exaggerated features), and disseminated private and childhood images of Plaintiff to further subject her to public scorn. Defendants branded Plaintiff with derogatory nicknames such as “Lips” and “Legally Lips,” and encouraged their followers to do the same.
56. Defendants deliberately solicited and incited their large online audiences—numbering in the hundreds of thousands—to participate in the harassment of Plaintiff, including the creation, maintenance, and proliferation of “hate sites” and coordinated social media attacks. These actions resulted in hundreds of defamatory and harassing posts, emails, and comments targeting Plaintiff, which appeared in public search results and were seen by Plaintiff’s clients, colleagues, and family. The harassment extended to Plaintiff’s family members, including her children, and involved personal threats and continuous online stalking.

57. Defendants persisted in their conduct even after Plaintiff provided all parties with sworn documentation from the Florida Bar disproving the allegations of disbarment, and after Plaintiff issued cease and desist requests in writing. Defendant Hales responded dismissively to Plaintiff's efforts to halt the harassment, stating, "See you in Court," and continued to encourage the defamatory and harassing conduct.
58. Defendant Hales, in public videos and on his YouTube channel "What the Hales," expressly stated that his intent in initiating lawsuits against his perceived adversaries was not to seek justice, but to "ruin" and "destroy" them financially and emotionally. Hales openly mocked and threatened those he was suing, including Plaintiff, to an audience of over 730,000 followers, further exacerbating the campaign of humiliation and distress.
59. Defendants knew or should have known that Plaintiff is a member of an ADA-protected class due to her disability. In spite of this knowledge, Defendants and their followers specifically targeted Plaintiff's disability in their broadcasts, posts, and online comments, mocking her mental health and accusing her of being "crazy," "off her meds," and "mental," and otherwise referencing her disability in a demeaning and stigmatizing manner. Defendants' conduct was not only extreme and outrageous, but also demonstrated a callous disregard for Plaintiff's federally protected rights and dignity.
60. As a direct and proximate result of Defendants' extreme and outrageous conduct, Plaintiff suffered severe emotional distress, including humiliation, anxiety, depression, fear for her safety and the safety of her family, and loss of business relationships and professional opportunities. The ongoing harassment and humiliation caused Plaintiff to become debilitated, depressed, and nearly hospitalized, and resulted in her being forced to delete

all of her social media accounts in an effort to escape the attacks. Plaintiff's reputation within her professional and personal communities has been irreparably damaged.

61. Defendants' conduct was intentional and malicious, or at a minimum, reckless, as they knew or should have known that their actions would cause Plaintiff severe emotional distress and would exacerbate Plaintiff's disability. Defendants acted with actual malice and a conscious disregard for Plaintiff's well-being and rights as an ADA-protected individual.

WHEREFORE, Plaintiff respectfully requests judgment against Defendants for compensatory and punitive damages, an injunction prohibiting further harassment, costs of this action, and such other relief as the Court deems just and proper.

**COUNT IV: NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**  
**(Against Defendants Hales, Rizk, Hip, Fox, Umbrella Guy, Shizzlywiznut, and Others)**

53. Plaintiff realleges and incorporates by reference all preceding paragraphs as if fully set forth herein.

54. Defendants Hales, Rizk, Hip, Megan Fox, Umbrella Guy, Shizzlywiznut, and others, individually and collectively, owed Plaintiff a duty to exercise reasonable care in the statements and content they published about her, and in their handling and dissemination of her private information and images. Defendants breached that duty by negligently publishing, republishing, and amplifying false, harmful, and offensive statements about Plaintiff—including but not limited to claims that Plaintiff was “knocked up by her acquaintance,” that she was “a disbarred attorney” or had retired to avoid disbarment, and that she created “revenge porn”—without taking reasonable steps to verify the truth or accuracy of such statements.

55. Defendants further breached their duty of care by allowing, encouraging, and participating in online harassment campaigns, including but not limited to: the recruitment of followers to create and operate “hate sites” targeting Plaintiff; the alteration and widespread public sharing of Plaintiff’s photographs, including childhood images; and the persistent publication of private, non-newsworthy facts about Plaintiff’s life, marital status, disability, and family.

56. Defendants also failed to consider or safeguard Plaintiff’s well-being, including her status as a member of an ADA-protected class. Defendants and their followers repeatedly mocked Plaintiff’s disability, made stigmatizing comments about her mental health, and encouraged others to do the same—all without regard for the foreseeable harm such conduct would cause.

57. As a direct and proximate result of Defendants’ negligent conduct, Plaintiff suffered severe emotional distress, including humiliation, anxiety, depression, fear for her safety and well-being, and the loss of her ability to participate in social media or carry on her professional activities without threat of harassment and reputational harm. Plaintiff was compelled to delete all her social media accounts and has suffered tangible damage to her reputation, professional standing, and business relationships.

58. Defendants’ actions were the actual and legal cause of Plaintiff’s emotional harm, and such harm was reasonably foreseeable given the nature, volume, and intensity of Defendants’ conduct and the vulnerable position in which Plaintiff was placed.

WHEREFORE, Plaintiff respectfully requests judgment against Defendants for compensatory damages, costs of this action, and such other relief as the Court deems just and proper.

**COUNT V: CYBERSTALKING / HARASSMENT**  
**(Against Defendants Hales, Rizk, Hip, Fox, Umbrella Guy, Shizzlywiznut, and Others)**  
**(Violation of Fla. Stat. § 784.048)**

53. Plaintiff realleges and incorporates by reference all preceding paragraphs as if fully set forth herein.

54. Defendants Hales, Rizk, Hip, Megan Fox, Umbrella Guy, Shizzlywiznut, and others, acting individually and in concert, engaged in a sustained pattern of willful, malicious, and repeated conduct directed at Plaintiff through electronic communications and social media platforms, including but not limited to Facebook, YouTube, and associated online “hate sites.”

55. Beginning on or about May 5, 2025, and continuing through the present, Defendants published and circulated false, defamatory, and highly offensive statements about Plaintiff, including but not limited to: accusations that Plaintiff was “knocked up by her acquaintance,” assertions that Plaintiff was “a disbarred attorney” or retired to avoid disbarment, and claims that Plaintiff created “revenge porn.” These statements were repeatedly broadcast to large audiences and disseminated through multiple online channels.

56. Defendants created, maintained, and encouraged the creation of “hate sites” and public social media groups—most notably the “What the Hales” Facebook group—which were dedicated to attacking and harassing Plaintiff. Within these groups, Plaintiff was relentlessly mocked, defamed, and insulted by both Defendants and their recruited followers, with hundreds of posts and comments appearing in internet searches under Plaintiff’s legal name.



57. Defendants solicited, encouraged, and directed their broad online audiences—numbering in the hundreds of thousands—to participate in the harassment of Plaintiff. This included the alteration and repeated public dissemination of Plaintiff’s photographs (including images depicting her as a clown, with exaggerated features, or as “Legally Lips”), the sharing of childhood images without consent, and the publication of private, non-newsworthy facts about Plaintiff’s personal and family life.
58. Defendants used their online broadcasts and platforms to repeatedly and intentionally target Plaintiff. Defendants Hales, Rizk, and Hip hosted live YouTube videos and social media broadcasts in which they ridiculed, insulted, and defamed Plaintiff. Defendants Megan Fox and Umbrella Guy, among others, published daily content featuring ongoing ridicule, false statements, and personal attacks against Plaintiff, including attacks on her mental health, disability, and professional reputation.
59. Defendants’ conduct escalated to include attacks on Plaintiff’s family members, including her children, as well as direct harassment through emails and public posts, causing Plaintiff to experience fear for her safety and the safety of her family.
60. As a result of this extensive and ongoing harassment, Plaintiff was forced to delete all of her social media accounts to avoid further abuse, suffered emotional distress, humiliation, anxiety, depression, and tangible damage to her reputation, professional standing, and business relationships. Plaintiff’s ADA-protected disability was specifically targeted and mocked by Defendants and their followers, exacerbating the harm caused.
61. The conduct of Defendants constitutes cyberstalking as defined in Fla. Stat. § 784.048(1)(d) and (2), in that Defendants knowingly, willfully, and maliciously harassed,

cyberstalked, and repeatedly communicated with Plaintiff through electronic means, causing substantial emotional distress and serving no legitimate purpose.

WHEREFORE, Plaintiff respectfully requests judgment against Defendants for compensatory and punitive damages, an injunction prohibiting further harassment and cyberstalking, costs of this action, and such other relief as the Court deems just and proper.

**COUNT VI: CIVIL CONSPIRACY**  
**(Against Defendants Hales, Rizk, Hip, Fox, Umbrella Guy, Shizzywiznut, and Others)**

53. Plaintiff realleges and incorporates by reference all preceding paragraphs as if fully set forth herein.

54. Defendant Jeremy Hales operates a YouTube channel and social media presence built on provoking controversy with third parties, frequently targeting neighbors, opposing attorneys, and others involved in litigation against him. His content is characterized by disparagement, humiliation, and mockery of individuals' appearance, religious backgrounds, age, and other personal traits. As a result of this conduct, Defendant Hales has previously been the subject of stalking injunctions, including documented violations of such injunctions, and has faced public criticism and legal actions from various targets (see EXHIBIT B).

55. Defendant Hales' audience is primarily rural, ages 45-75, both male and female, and includes a significant international following. The thumbnails and promotional content used by Defendant Hales routinely depict neighbors and adversarial attorneys in a false and disparaging light (see EXHIBIT A), contributing to a climate of public harassment that has discouraged legal representation for parties involved in disputes with him.

56. This action arises from a deliberate, coordinated campaign of online harassment, defamation, and reputational sabotage orchestrated by Defendant Hales and his associates, including Defendants Megan Fox, Jay Hip, Rizk, Shizzywiznut, and others. Plaintiff, a retired attorney assisting her husband's law firm, became a target after participating in a neutral interview concerning ongoing litigation involving Defendant Hales. Defendants then weaponized their significant online following to publish and amplify hundreds of false, malicious statements about Plaintiff, escalating from a single Facebook post to a wide-reaching campaign.
57. These attacks, carried out across public Facebook groups and live YouTube broadcasts, included defamatory claims about Plaintiff's professional status, personal life, and mental health, calculated to destroy her reputation and livelihood. Despite Plaintiff's repeated efforts to correct the record—including providing sworn affidavits from the Florida Bar—Defendants persisted, recruiting followers, encouraging hate sites, and profiting from live donations and increased engagement rooted in continued dissemination of these falsehoods. The conduct has caused severe, ongoing harm to Plaintiff's personal and professional life, necessitating judicial intervention and redress.
58. In furtherance of the conspiracy, Defendants knowingly agreed and acted in concert to engage in this coordinated campaign, jointly and repeatedly publishing false and defamatory statements about Plaintiff—including that she was “knocked up by her acquaintance,” “a disbarred attorney,” and a creator of “revenge porn”—on Facebook, YouTube, and other platforms. Defendants regularly coordinated their conduct by appearing together in live video broadcasts, soliciting donations while repeating false

claims, and encouraging audience participation in the harassment and defamation of Plaintiff.

59. Defendants recruited supporters and followers to create and maintain online “hate sites” targeting Plaintiff, altered Plaintiff’s photographs to ridicule her, and disseminated private and childhood images of Plaintiff for public mockery. Daily broadcasts by Defendants Megan Fox and Umbrella Guy focused on Plaintiff, spreading false statements and insults, while Defendants Hip, Hales, and Rizk participated in livestreams reiterating defamatory claims and mocking Plaintiff’s appearance.
60. These acts were not isolated, but part of a broader, orchestrated scheme masterminded by Defendant Hales to manipulate viewership analytics, silence dissent, and financially benefit those who participate in his campaign. Data analysis demonstrates that creators who align themselves with Defendant Hales—including Megan Fox, That Umbrella Guy, and Jay Hip—have experienced dramatic increases in online metrics and financial rewards, while those who refuse or attempt to expose the scheme are subjected to targeted harassment and reputational attacks.
61. This systematic campaign to manipulate public opinion and stifle free expression utilizes fake accounts, cyber harassment, and intimidation tactics, with the goal of punishing truth-telling and rewarding misinformation for personal profit. The consequences undermine the integrity of online platforms and the rights of individuals to express themselves freely, warranting legal scrutiny and redress. Evidence supporting these claims includes timelines, digital communications, and analytics data illustrating the existence and operation of the scheme (see EXHIBITS A and B).

62. Defendants' collective goal was to harm Plaintiff's reputation, cause her severe emotional distress, drive her from social media, disrupt her professional relationships, and "drain and ruin" her financially and emotionally, as expressly admitted by Defendant Hales in public statements and online broadcasts.

63. As a direct and proximate result of Defendants' agreement and concerted actions in furtherance of the conspiracy, Plaintiff has suffered and continues to suffer severe emotional distress, humiliation, economic harm, loss of enjoyment of life, loss of reputation, and damage to her business and professional relationships.

WHEREFORE, Plaintiff respectfully requests judgment against Defendants for compensatory and punitive damages, an injunction prohibiting further unlawful acts in furtherance of the conspiracy, costs of this action, and such other relief as the Court deems just and proper.

**COUNT VII: TORTIOUS INTERFERENCE WITH BUSINESS RELATIONSHIPS**  
**(Against Defendants Hales, Rizk, Hip, Fox, Umbrella Guy, Shizzlywiznut, and Others)**

53. Plaintiff realleges and incorporates by reference all preceding paragraphs as if fully set forth herein.

54. At all relevant times, Plaintiff maintained valid, advantageous, and ongoing business relationships and expectancies with her clients, colleagues, and professional contacts, including through her work assisting her husband's law firm.

55. Defendants Hales, Rizk, Hip, Megan Fox, Umbrella Guy, Shizzlywiznut, and others, individually and acting in concert, had actual knowledge of Plaintiff's business relationships and professional reputation and intentionally, unjustifiably, and without privilege interfered with those relationships by engaging in a sustained campaign of defamation, harassment, and invasion of privacy aimed at Plaintiff.

56. Defendants repeatedly published and disseminated false, defamatory, and highly damaging statements about Plaintiff across multiple social media platforms, including Facebook and YouTube. These statements included, but were not limited to, false claims that Plaintiff was “knocked up by her acquaintance,” that she was “a disbarred attorney” or retired to avoid disbarment, and that she was involved in creating “revenge porn.” Defendants also repeatedly insulted and demeaned Plaintiff’s personal and professional character, including mocking her appearance and mental health.
57. Defendants created, maintained, and actively encouraged the creation and operation of online “hate sites” and social media groups specifically targeting Plaintiff. They altered and publicly disseminated Plaintiff’s photographs, including humiliating edits and childhood images, for the purpose of ridicule and harassment.
58. Defendants solicited, directed, and incited their large online audiences—numbering in the hundreds of thousands—to participate in the harassment campaign, amplifying the dissemination of false statements and defamatory content, thereby exponentially increasing the damage to Plaintiff’s reputation and business standing.
59. As a direct and proximate result of Defendants’ unlawful interference, Plaintiff was compelled to delete all of her social media accounts to avoid further harassment and protect her well-being. Nonetheless, Plaintiff’s clients and professional contacts became aware of the defamatory “hate sites” and online attacks. Numerous clients questioned Plaintiff about these false and damaging statements, resulting in the loss of business opportunities, diminished client confidence, and irreparable harm to Plaintiff’s professional relationships and reputation.

60. Defendants' conduct was intentional, malicious, without justification, and directly caused the damage and loss to Plaintiff's business relationships and professional standing.

WHEREFORE, Plaintiff respectfully requests judgment against Defendants for compensatory and punitive damages, an injunction prohibiting further interference with Plaintiff's business relationships, costs of this action, and such other relief as the Court deems just and proper.

### **DEMAND FOR JURY TRIAL**

Plaintiff hereby demands a trial by jury on all issues so triable as a matter of right pursuant to Rule 1.430, Florida Rules of Civil Procedure.

### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiff respectfully requests that this Court:

- A. Award compensatory, special, and punitive damages in an amount to be determined at trial;
- B. Enter judgment in Plaintiff's favor on all claims;
- C. Order Defendants to retract all defamatory statements;
- D. Award Plaintiff reasonable attorneys' fees and costs; and
- E. Grant such other and further relief as the Court deems just and proper.

### **CERTIFICATE OF SERVICE**

WE DO CERTIFY, that a copy of the foregoing has been furnished electronically with the Clerk of Courts by using the EPORTAL system, all parties of record.

6/15/25  
Dated

/s/ Michael Ferderigos  
Michael Ferderigos, Esq.  
Bar No.: 604011  
10454 Birch Tree Lane  
Windermere, FL 34786  
Telephone 407-592-0035  
mferderigos@gmail.com  
michael@civilestatelaw.com



IN THE CIRCUIT COURT OF 9<sup>TH</sup> JUDICIAL CIRCUIT OF  
ORANGE COUNTY, FLORIDA

LESLIE FERDERIGOS,  
Plaintiff,  
v.

Case No. **2025-CA-004528**

JEREMY HALES,  
ELEPHANT SHOE, LLC.  
MARTHA GEORGE RIZK, aka GEORGE HALES  
JOHN DOE (aka RAY HIP),  
and JOHN/JANE DOES 1-10,  
Defendants.

**NOTICE OF EXHIBITS IN SUPPORT OF TIMELINE OF PUBLISHED STATEMENTS**

PLEASE TAKE NOTICE of Timeline with exhibits of published statements and Leslie Ferderigos reactive statements in response to online attack.

**CERTIFICATE OF SERVICE**

WE DO CERTIFY, that a copy of the foregoing has been furnished electronically with the Clerk of Courts by using the EPORTAL system, all parties of record.

6/13/25  
Dated

/s/ Michael Ferderigos  
Michael Ferderigos, Esq.  
Bar No.: 604011  
10454 Birch Tree Lane  
Windermere, FL 34786  
Telephone 407-592-0035  
mferderigos@gmail.com  
michael@civilestatelaw.com

## TIMELINE

**On or about April 26, 2025** Leslie Ferderigos saw a concerning facebook post come through her news feed about Michael Volpe, whom she had known as a reporter since 2022. Upon receipt of this post, Leslie Ferderigos immediately reaches out to Michael Volpe to inform him. In response, Michael Volpe requests Leslie Ferderigos, to interview him, and give her perspective as a retired attorney on Jeremy Hales lawsuits filed against various defendants.

At this time, Leslie Ferderigos, did not have but 7 subscribers, made up of friends, family, & clients that she used to upload and share videos with. At no time, was Leslie attempting to grow her channel with those following the Jeremy Hales lawsuits. Leslie Ferderigos had audio podcasts where she interviewed to educate the public on legal issues on Spotify, iHeart Radio, & Facebook. Leslie Ferderigos had never heard of Jeremy Hales prior to Michael Volpe requesting her to do an interview with him.

**On or about April 27, 2025**, after Michael Volpe suggested Leslie interview Megan Fox, who was endorsing Jeremy Hales. However, at no time, despite confirmed receipt and multiple reviews of Leslie's email did, Megan Fox respond to be interviewed.



LESLIE FERDERIGOS <leslieannferderigos@gmail.com>

### **Request for your position on what has been provided to me**

2 messages

LESLIE FERDERIGOS <leslieannferderigos@gmail.com>

Sun, Apr 27, 2025 at 12:58 PM

To: meganfoxwriter@protonmail.com

Bcc: "Michael Volpe (Other)" <mvolpe998@gmail.com>

Hello Megan,

It's Leslie Ferderigos. I use to practice law as an attorney, but now I am working behind the scenes to consult attorneys on trial preparation, appeals, & federal lawsuits. I actually represented Gabe Shapior and Eric Satin, and I think you and Mike Volpe interviewed both of them in 2021.

Mike reached out to me because I have been doing a podcast on my new show. I'm going to have him on about *What the Hales* and the lawsuits he's filed. Mike said they are frivolous and he's using them for content. He mentioned you are going along and unethically reporting on things favorably to him because he helps you get more subscribers. I always like to hear from both sides, please advise as to your position.

Best Wishes,

Leslie Ferderigos, Esq.(Ret.)

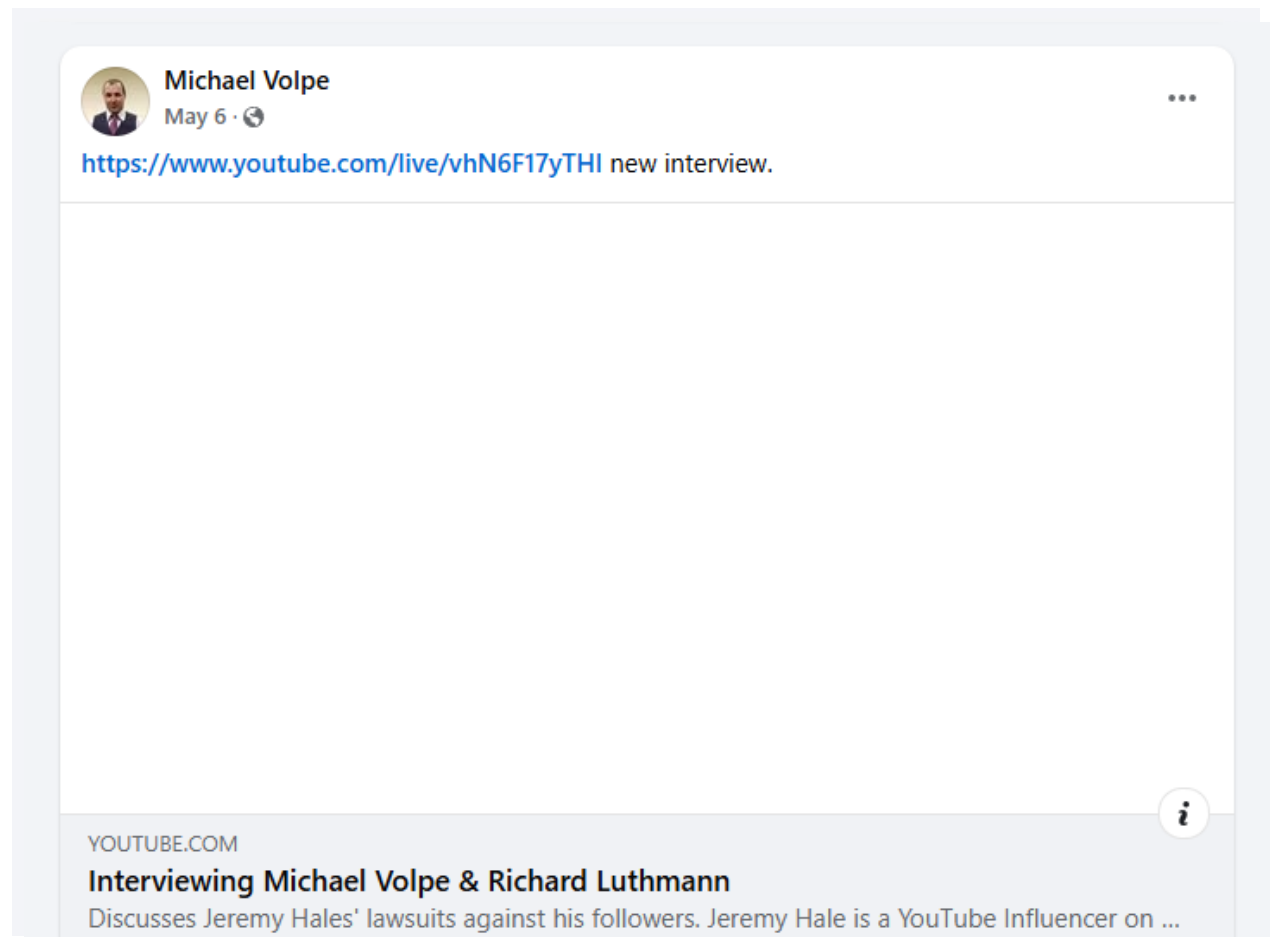
407-919-3939

[www.CivilEstateLaw.com](http://www.CivilEstateLaw.com)

[www.LegallyProSe.com](http://www.LegallyProSe.com) (Legal Educational Books)

**On or about April 29, 2025** Leslie Ferderigos Entertained an Interview request for Michael Volpe

**On or about May 5, 2025,** Michael Volpe publishes his interview with Leslie Ferderigos, across multiple forums, including the facebook group.



**On or about May 13, 2025,** Michael Volpe publishes interview on What the Hales Facebook site. Upon publishing, harassing comments were made about Leslie Ferderigos were published by those in contact with Jeremy Hales who had been harassing various defendants in Jeremy Hales federal lawsuits, such as Lisa Weeks, Supa Dave, Bruce, Rich Luthmann, as evidence by the voluminous preceeding posts viewed on this site. Many of the post are made anonymously or with muppet pictures and facebook profile that appear to be fake with no

friends. Leslie Ferderigos reports this site multiple times to facebook. However, nothing gets taken down.



John D. Grems Jr.

Yesterday at 9:53 AM · 🌐

[Michael Volpe](#) complaining about Jeremy making veiled and empty threats to him yet he makes what some might call actual threats. He has threaten to sue me for calling him a child abuser. I'm posting the thread and you can decide. Did I accuse him of a crime?

BTW, Mr. Volpe, I'm sitting here in my office waiting, the next move is up to you. Just like I'm waiting for Michael Littles expose' on me. You know you are right in the middle, when both sides are trying to silence you.



Kimberly R Roberts

May 28 at 12:30 PM · 🌐

Aaawwww, lookie here, I call out [Michael Volpe](#) for his treatment of the women in his life, and how he treated his own children after he tried to once again defame JH, and he couldn't take the heat so he deleted his post. What part did you not want to answer? The how if you are going to say things about Jeremy, we needed to talk about your past abuse? Or the part where I asked if you were willing to admit you Luthman and 5150 Leslie were crowd funded by Bruce and Lisa to be bullies?



BAD LAWYER WAS FIRED - Federal Court Update

59K views · Streamed 1 month ago

What The Hales

BAD LAWYER WAS FIRED - Federal Court Update Bad Lawyers Everywhere OTTER CREEK, FL PUBLISHED ON: 04.06.2025 ...

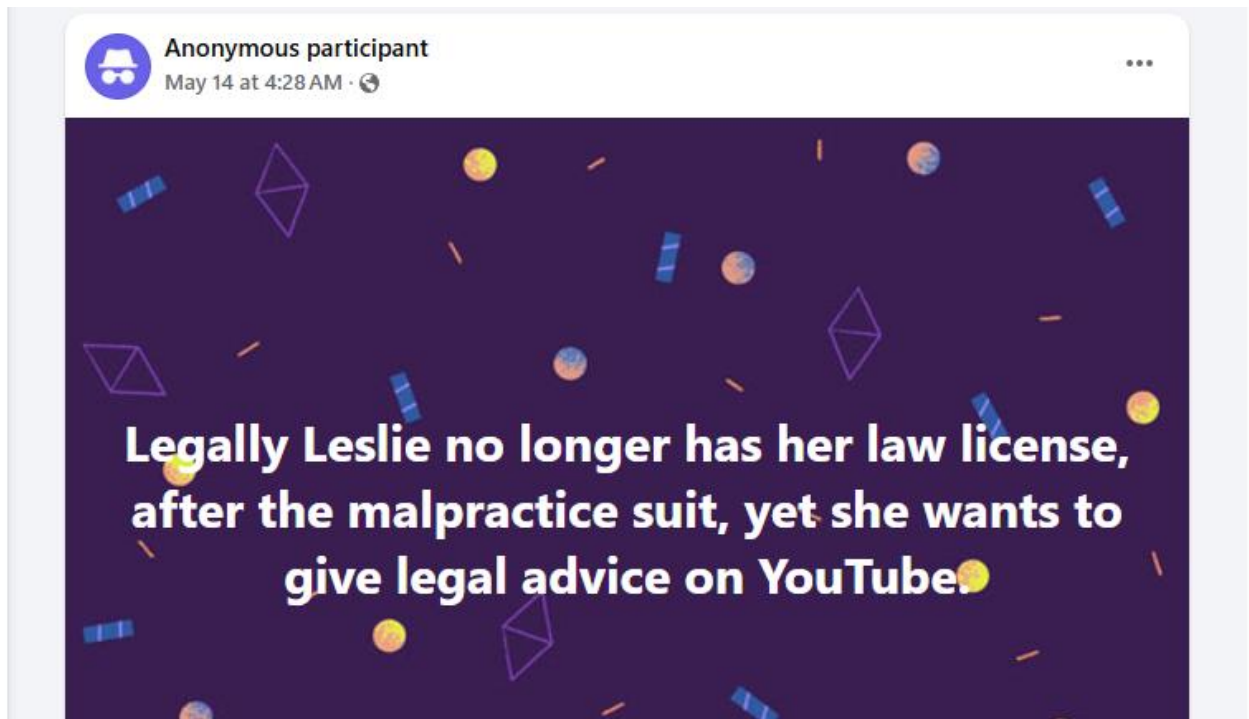
**On or about May 15, 2025,** Members of the Facebook group began posting that Leslie Ferderigos is a disbarred attorney, among voluminous insults & harassment. This has continued to date. Comments imply Leslie Ferderigos is a transexual, Leslie Ferderigos is crazy and off her meds, Leslie Ferderigos just wants to grow her YouTube channel. Clients begin calling Leslie Ferderigos to inform her they are seeing the online attack against her and feel bad for her. And within a day over 500 people subscribe to Leslie Ferderigos' YouTube Channel, and begin making berating comments to Leslie Ferderigos about being a failed disbarred attorney. Additionally, Leslie Ferderigos begin getting harassing emails from those endorsing Jeremy Hales.

Leslie Ferderigos provided all parties with the Sworn Affidavit from the Florida Bar. However, they continue to falsely state, Leslie retired to evade disbarment, and falsely post the reasons for her retirement.

I, Cynthia B. Jackson, being duly sworn, deposes and says:

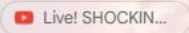
1. I am employed by The Florida Bar, 651 E. Jefferson Street, Tallahassee, FL 32399, and my title is Director, Division of Administration & Chief Financial Officer.
2. I am a custodian of records maintained by The Florida Bar or am a person otherwise qualified to make these representations as my job responsibilities include the gathering of records pursuant to subpoena or other record requests.
3. This Affidavit is provided pursuant to Sections 90.803(6) and 90.902(11), Florida Statutes.
4. I have reviewed the membership records of The Florida Bar concerning Ms. Ferderigos, and they indicate that:
5. Ms. Ferderigos was a member of The Florida Bar, admitted on 04/22/2017, and her membership number was 0127526.
6. The records of The Florida Bar reflect that Ms. Ferderigos was an active member in good standing with The Florida Bar from 4/22/2017 until 11/23/2021, at which time she became delinquent for non-payment of disciplinary costs.
7. On 11/29/2021 she removed her cost delinquency and returned to active status as a member in good standing.
8. On 3/13/2023, Ms. Ferderigos chose to permanently retire from The Florida Bar and is not eligible to practice and not eligible for reinstatement unless permitted by The Florida Board of Bar Examiner's Office.
9. The above records were made by staff of The Florida Bar, or persons acting under their control, in the regular course of business, at the time of the occurrence noted or within a reasonable time thereafter.

*Cynthia B. Jackson*



**On or about May 16, 2025,** Megan Fox, That Umbrella Guy, and Jay Hip begin to go LIVE in front of thousands of people stating and mocking Leslie Ferderigos as a failed attorney who retired to evade disbarment.

**On or about May 16, 2025,** in response to the attacks Leslie Ferderigos began to create satirical videos series called the “HoDunk Hillbillies” & gives it to Lisa Weeks, Supa Dave, Bruce, Rich Luthmann, Attorney Bruce, & Michael Volpe to post after seeing how they were all being attacked by Jeremy Hales and his supporters to depict how she was viewing this situation and attacks against her, not using anyone’s names & making it clear it was satire.

Big Little Gal	PSPS Facebook WTH is not owned by Hales - Some overseas troll/hacker long ago started that What the Hales ...	May 19
Big Little Gal	PS - You really need to gain a little weight, stop with the lip plumping, and cut down on that awful heavy lipstick an...	May 19
Big Little Gal	GOODBYE - I want nothing to do with you as I think you are a TOTAL FOOL and STUPID. That law exam has to be w...	May 19
Big Little Gal	RETIRE BEFORE DISBARRED - I had to review Hales livestream from Sunday night to see what you were talking ab...	May 19
Big Little Gal	WHO IS JAY HIP? - I never took a look at Jay Hip until you mentioned him tonight. I guess I didn't realize he started...	May 19
Big Little Gal	MY INTEREST - #1 I started watching Hales because I am part of a YouTube community called "resellers." Althoug...	May 19
Big Little Gal	Hales timeline, Preston strikes - So there was an election in Otter Creek and Terese from the campground beca...	May 19
Big Little Gal 2	(no subject) - Watch the last three minutes of this video. <a href="https://www.youtube.com/watch?v=S1z42MtCMrQ">https://www.youtube.com/watch?v=S1z42MtCMrQ</a> FYI Th...	May 19
Big Little Gal 2	HALES - Tori the whips and chains - I just want you to see who you are joining forces with. You talk about Christi...	May 17
Big Little Gal 3	HALES-Lynette Preston - I tried to resend the two. I am starting where I think you can get an idea of the beginnin...	May 17
		
Big Little Gal	resend - To the best of my knowledge this is the second video JH made about Preston/Cook. He shows a clip of th...	May 16
Big Little Gal 2	Hales - Big Little Gal has sent you an email via Gmail confidential mode: Fwd: Hales This message was sent on May...	May 16
Big Little Gal	Jeremy losing patience #1 - <a href="https://www.youtube.com/watch?v=NVDaf_Aww0A">https://www.youtube.com/watch?v=NVDaf_Aww0A</a>	May 16

**On or about May 18, 2025,** During the same week, Jeremy Hales goes live in front of over 750,000 subscribers that same week making statements about a retired attorney who retired to evade disbarment. During this same time, YouTube Influencer, Jay Hip reports for Hales began publishing during their lives that Leslie Ferderigos is a disbarred attorney and corrected themselves stating she retired to evade disbarment.

**On May 19, 2025,** Leslie Ferderigos files a lawsuit, later amending it that names Jeremy Hales, Jay Hip, George Hales



05/19/2025	Civil Cover Sheet	1	
05/19/2025	Complaint	10	
05/19/2025	Civil Cover Sheet	3	
05/19/2025	Case Initiated		

**On or about May 26, 2025,** Leslie Ferderigos is informed to watch That Umbrella Guys' Live with Megan Fox, where Leslie hear both these people make statements about how she retired her license to evade disbarment, amongst other statements that were harassing and dealt with her personal life.

**On May 27, 2025,** Leslie Ferderigos amends her complaint to add Megan Fox and That Umbrella Guy after witnessing them making statements to imply she retired to evade disbarment

05/27/2025	Amended Complaint Comments: AND DEMAND FOR JURY TRIAL	42	
05/20/2025	Uniform Order Setting Case for Jury/Pretial - General	11	
05/19/2025	Motion to Seal File Comments: MOTION TO SEAL CASE AND MAINTAIN CONFIDENTIALITY	3	
05/19/2025	Civil Cover Sheet	1	
05/19/2025	Complaint	10	
05/19/2025	Civil Cover Sheet	3	
05/19/2025	Case Initiated		

**On or about May 21, 2025,** Hate Groups mocking Leslie Ferderigos are created on Facebook, where Leslie Ferderigos physical appearance is mocked, with her name tagged publicly. Megan Fox, hosts a LIVE making a mockery out of Leslie Ferderigos' lawsuit against everyone, encouraging an audience, while posting personal family law cases, involving Leslie Ferderigos

**From May 21, 2025 until May 27, 2025,** Leslie Ferderigos becomes debilitated and depressed and deletes everyone of her social media accounts to evade the attack. However, they continue to attack her on multiple social media forums during LIVE and facebook posts, emails directly sent to her

## Legally Duckface "Lips / Leslie Ferderigos

Public group · 27 members

Join group

Share

About Discussion Featured People Media Files

Search

Write something...

Anonymous Post

Feeling/activity

Jaye Cloud  
1h · 🌐

11:10

Legally Leslie LIVE  
11:10  
11:10  
legallyleslie.com  
Subscribe

Shorts Live Podcasts Playlists Posts

Legally Leslie LIVE

14 minutes ago

What I cannot understand is, the truth speaks for itself. If the Hates condition is so strong, why try and kill the

What I cannot understand is, the truth speaks for itself. If the Hates condition is so strong, why try and kill the

Like

Comment

Send

Share

Comment as Ashley Page

LW.S.Y.D.H.T.  
1h · 🌐



<https://www.facebook.com/groups/1215436713700192/files/>

### About

Public

Anyone can see who's in the group and what they post.

Visible

Anyone can find this group.

### Recent files

Complaint Filed - 19th May 2025.pdf  
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Motion to Seal Case.pdf  
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### Recent media



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YOUTUBE.COM

### SUE JEREMY HALES? ARE THEY CRAZY???

The nonsense never stops and the cast of characters that join the anti-What th...



Like



Comment



Send



Share



Comment as Ashley Page



André Cordeau

2h · 🌐



Her mugshot



Motion to Seal Case.

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cover sheet ready to

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#### Recent media



See all

Before I give myself another migraine, who is this pout trout and why is she sticking her nose into this?.

3 comments

 Like  Comment  Send  Share



Ania Waterman [Admin](#)

She a "PERMANENTLY RETIRED" Lawyer who is now part of the Anti WTH group

9h [Like](#) [Reply](#) [Share](#)


 André Cordeau replied · 2 Replies 2h



Answer as Ashley Page



Ania Waterman

[Admin](#) · 8h · 

13th Oct 2022 - Disciplinary Aaction

The Florida Bar (Complainant)


Leslie Ferderigos (Respondent)



ACIS.FLCOURTS.GOV

[acis.flcourts.gov](#)

 1

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Ania Waterman

Admin · 9h · 




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url/wwww.facebook.com/photos/?fbid=31389706076176338&...



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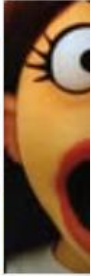
Recent media



What I cannot see if the facts and credibility of any might not see the aggressive attack their position? If for that, let it see investigating, the today, after she it will be sent to art to see enforcement



Cartoon clown with red hair and a yellow crown, looking into a mirror.



Close-up of a cartoon eye with a large pupil.

See all



Ania Waterman

Admin · 16h ·

## JHs claims against defendants by Legally Leslie

4 hours ago (edited)

...eases citing Florida Law on the claims Jeremy Hales has all...  
te these press releases after reviewing more evidence. I am I...  
nowledge so you can get an accurate understanding of these I...  
e types of cases in court. Everything I write is verified throug...  
made by Jeremy Hales, with the laws that apply to the claim

### ...ales YouTube Lawsuit: What the Law Really Says About Opinions, Reporting, ... spiracy"

...ults have raised big questions about whether YouTube creators, reporters, and...  
can be sued just for talking about a public figure and sharing opinions online...  
at federal and Florida law actually say—broken down simply, with real-world

### ...u Get Sued for Sharing Your Opinion About a Public Figure?

wer: Not unless you lie on purpose.

...e is famous or has a big online following—like a major YouTuber—they are legally a...  
just. "U.S. Supreme Court law (*New York Times Co. v. Sullivan*, 1964) says public...  
s't win a defamation lawsuit (that's when someone claims you hurt their reputation by...  
...they prove you made a false statement on purpose or recklessly ignored the truth...  
led "actual malice."

...t, "I think Jeremy is wrong for how he treats his neighbors," that's an opinion. Even i...  
agrees, that's not defamation.  
"Jeremy was convicted of a crime," and it's not true and you knew it wasn't true, tha...  
efamation.

*New York Times Co. v. Sullivan*, 376 U.S. 254 (1964)

### ...bout Opinions Based on Public Records?

...otected—opinions and fair commentary are free speech.

...me Court even says, "There is no such thing as a false idea." (*Gertz v. Robert Welch*,...  
) Only false statements about actual facts can be defamation. If you're giving your...  
...ed on public documents—like court filings or YouTube videos someone posted...  
s—you're protected.

...ords show Jeremy's neighbor got a restraining order, you can say, "In my opinion...  
lot." You're allowed to interpret public info

### 3. What If Two YouTubers or Reporters Talk About the Same Story? Is That a Conspiracy?

Not unless they're plotting a crime or fraud together.

Florida law is clear: Just talking, appearing on each other's channels, or sharing opinions—even...  
if you all disagree with the public figure—doesn't count as "conspiracy." There has to be a real...  
agreement to do something illegal, like commit fraud or defamation, not just to discuss or...  
criticize someone.

#### Example:

If two creators both cover the Jeremy Hales story, and one says "I agree with you," that's not...

conspiracy.

If they secretly plan to commit lies to destroy someone's business, that could be conspiracy—but...

just talking or reporting is not.

\**Croston, Russell v. Feltberg*, 902 So. 2d 1273 (Fla. 3d DCA 1997); *Hunt v.*...

*Green, Rose, Kahan & Pashkowsky*, 436 So. 2d 949 (Fla. 3d DCA 1983)\*

### 4. What About Attorneys Talking to the Media?

Totally normal and legal.

Attorneys often talk to reporters to explain their client's side, especially in high-profile cases...  
That's not conspiracy. It's part of the legal process.

### 5. Special Protections for the Media in Florida

Florida law gives the media some protection:

- You must give the media a chance to correct or retract a statement before you can sue for...  
defamation. (*Florida Statute 770.01*)
- If they correct, damages are limited. (*Florida Statute 770.02*)
- Florida courts follow the "actual malice" rule for public figures, just like the federal courts...  
(*Miami Herald v. Am.*, 1984)
- Press opinions = protected speech. (*Green v. Talkshow Democrat, Inc.*, 1983)

...endment.

...king, collaborating, or even criticizing someone online—even with...  
and it's not conspiracy.

...designed to protect open discussion and reporting, even when pow...  
what's being said about them.

...mation, see:

...s Co. v. Sullivan, 376 U.S. 254 (1964)

...Welch, Inc., 418 U.S. 323 (1974)

...rain Journal Co., 497 U.S. 1 (1990)

...ub. Co. v. Ane, 458 So. 2d 239 (Fla. 1984)

...ssee Democrat, Inc., 400 So. 2d 52 (Fla. 1st DCA 1981)

...g, 702 So. 2d 1273 (Fla. 3d DCA 1997)

...& State Trial & Appellate Attorney

UCN: 482625CA084536A0010X

Judge: Michael Deen

Status: Pending

Index:

Date:

LESLIE FERDERIGOS

Plaintiff

Charge Details

Charge	Fine	Arrest	Disposition	Sentence

Document Status: Public Non-Public Document VOR Court Order Request Pending

Document Details

Document	Page	Thumbnail
Case Sheet	1	
Case Sheet	10	
Case Sheet	1	

Document Details

Document	Page	Thumbnail
Case Sheet	1	
Case Sheet	10	
Case Sheet	1	

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Answer as Ashley Page

Ania Waterman

Admin · 10h ·

Court case 2 between Leslie & Michael Ferderigos

6:34

Orange Co...

geclerk.com

## About

- Public**  
 Anyone can see who's in the group and what they post.
- Visible**  
 Anyone can find this group.

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- Complaint Filed - 19th May 2025.pdf**  
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- cover sheet ready to file - Doc.pdf**  
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## Recent media

- Logan's Law 1/18**  
 14 minutes ago  
 What I control understand is, the truth speaks for itself. If the truth speaks for itself, why try to tell the credibility of anyone investigating everything that might not see their own position. Why such an aggressive attack against someone who's questioning their position? When the evidence and truth for for that, let it speak for itself, without attacking everything. There is what was said to the group, today, after she attacked me for my reason. And now, what the truth is, is that she's not a person.

https://www.facebook.com/groups/1215436793700102/permalink/1215753323668530/



 Print 2025-DR-002182-O : FERDERIGOS, LESLIE vs. FERDERIGOS, MICHAEL

Case Header

Case Type: Dissolution of Marriage with Children

Date Filed: 2/27/2025

Location: Div 42

UCN: 482025DR002182A0010X

Judge: Mikaela Nix-Walker

Status: Pending


Citation Number:


Compliance Date:

Parties

Name	Type	Atty	Phone
LESLIE FERDERIGOS	Petitioner		
MICHAEL FERDERIGOS	Respondent		


1 comment

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Recent media




Legally Live

15 minutes

what I cannot under  
if the legal system  
credibility of anyone  
might not see that a  
aggressive attack by  
their position? What  
for itself, let it speak  
investigating, more a  
look, after the story  
will be sent to others  
to see enforcement





6:15

27%

MEGAN FOX



Live



## Live chat

Top messages 994



Michelle Henderson I think another motion dropped



David Holloway Lets go



Bobbie G here we go



Carole Warren 🙌🙌🙌🙌🙌🙌



Da Cool Gma I thought I missed it



Buck Neccid ⭐ Howdy @Karen's Books @Tracy Spencer



Megan Fox • 39 min ago • 649 votes



Who will have the most fun with new lawsuit?

Jeremy



MUG



Ray Hip



**On May 27, 2025**, Leslie Ferderigos opens a YouTube Channel for the purpose of having her own voice against those who are attacking her. Leslie Ferderigos begins making satirical videos mocking those who were attacking and spreading false statements about her. THIS IS AN EXAMPLE OF THE STYLE OF CONTENT CREATED TO REACT TO THE ATTACK PERPETRATED ONTO LESLIE FERDERIGOS





**On or about June 3, 2025.** Supporters of Hales, in contact with him, begin to harass Leslie Ferderigos' children and family.

**Tracey Norri**  
June 3 at 7:11 PM · 🌐

LESLEY WHY HAVE YOU HIDDEN YOUR OLDEST DAUGHTER.WHO IS A ADULT AND HER FATHER ALL THIS TIME.Ashley Boers, also known as Ashley Fano, is the daughter of **Leslie Ann Ferderigos** (born Leslie Boers) and **Darren A. Fano**. Leslie and Darren were not married, and Ashley was born when Leslie was 25 years old, around 2002. In 2012, Leslie married attorney Michael Ferderigos, with whom she has three additional children: WHY HAVE I POSTED THIS BECAUSE I CAN. IS IT TRUE WHO KNOWES

 7

47 comments 1 share


 Like

 Comment

 Send


No visible comments


 Share


**Tracey Norri**  
June 3 at 10:13 PM · 🌐


CLICK ON ASHLEY FANOS POST SOME1

28 comments

 Like

 Comment

 Send

 Share

**On June 7, 2025**, YouTube Influencer, DJ Rattis, who is endorsed by Hales, and make money from his YouTube Channel, who is domiciled in Australia publishes a video, where he uses Leslie Ferderigos image, voice, and creates a false interview depicting her in a demeaning light, while tagging her legal name as the heading



**Exclusive Interview: Leslie Lips Otherwise Known As @LegallyLeslie**  
**#djrattis #ottercreek #parody**



D...  
5...

**Join**



Subscribed



242



Share



870 views Jun 7, 2025

**\*\* The Following Video Has AI Altered Content. Names, Voice & Content Are Not Real & Have Been Altered For Parody Entertainment Purposes \*\***



DjRattis MusicMan

June 7 at 6:41 PM · 🌐




It's back!!!! Exclusive Interview. Leslie Lips.




YOUTUBE.COM

Exclusive Interview: Leslie Lips Otherwise Known As @LegallyLeslie #djrattis  
#ottercreek #parody


**DjRattis MusicMan**  
 June 7 at 1:40 AM · 🌐

Just made a response post to Leslie on her youtube channel.



**Legally Leslie (aka "Hot Lips" LOL)** · 5 hours ago

I just received a hate email with a link to a FB group making fun of me. It never ends.....Thank you all for your support. Pray for the light to conquer the darkness trying to influence people. This is a spiritual war and humans do not always understand this concept. No one is perfect, but we cannot be infiltrated by hate. IF ANYONE ATTEMPTS TO RESPOND TO THIS POST IN A HATEFUL OR INSULTING WAY, YOU WILL BE IMMEDIATELY BOOTED OFF THIS CHANNEL


Show less



👍 10   🗨   ➦





**2 Comments**   ≡   Sort by



Leslie, I'm not sure how to respond to this post. On 1 hand you maybe generally sorry for your actions, which lead to the posts and hate about you. But then on the other hand I feel you are only apologizing because you jumped into this mess head first and wanted publicity and when you didn't get it you started flip flopping. Unfortunately the hate won't stop until you drop all your cases and back out. I know you dropped Jay Hip, Megan and TUG but you are forgetting Jeremy and his businesses. You know you have done wrong. Until you are no longer a bleep on the radar the hate will continue. Don't take this as a threat, but more as a suggestion. You rolled with the wrong crew. I'm sure you were promised all kind of fame and fortune. Well you got the fame, but not the kind you wanted. How about join the group, use your real account and don't hide behind anonymous posts. If you show the members respect, you too in time will get respect back. However if you keep supporting people like Bruce Matzkin, Lisa Lee, Richard Luthmann, Michael Volmit and or any of the others from that group things will just continue. Hopefully we can see some REAL change from you.


Cancel Comment

  26
 25 comments

 Like
  Comment
  Send
  Share

Leslie Ferderigos reports this to YouTube, and creates a satirical video tagging DJ Rattis' name and challenging him to a dance off to try and make humor from the situation.

DJ Rattis then creates an insulting song where he publishes it, using Leslie Ferderigos name, while calling her a fail, loser, amongst other insulting language.

**From or about May 6, 2025 until present**, Ania Waterman, from Ireland, begins targeting and attacking Leslie Ferderigos, while commenting she is in touch with Jeremy Hales. Additionally, Jeremy Hales makes statements during LIVES that Leslie Ferderigos is sending Ania Waterman Harassing emails.

**On or about June 5, 2025**, Leslie Ferderigos reaches out to Jay Hip, in an attempt to settle everything to gain confirmation that he and the others will not keep falsely reporting about

the status of her retirement. In this conversation, she says insults or one thing, but false statements affecting her professional reputation and livelihood cannot be tolerated because she works for her husband's law firm and has clients and clients are seeing these posts questioning whether or not she was disbarred. In this conversation, Jay Hip informed Leslie, he is in contact with Megan Fox and That Umbrella Guy, and requested she drop them to. Leslie stated she would not be dropping the lawsuit, but as long as they would not continue to false report about her retirement status, she would drop both Megan Fox and That Umbrella Guy. However, the following week they are continuing to falsely report about Leslie's retirement status.

**On or about June 7, 2025,** Ania Waterman, sends an email harassing Leslie Ferderigos, in which Leslie Ferderigos, responds civilly trying to get her to stop. However, after Leslie agreed to apologize, because Ania Waterman told Leslie Ferderigos, she had autism, Ania Waterman begin posting publicly, clearly intended to make Leslie Ferderigos appear as if she is picking on a vulnerable person.

From: Double Karma <[doublekarma77@gmail.com](mailto:doublekarma77@gmail.com)>

Sent: Friday, June 6, 2025 7:24 PM

To: Legally Leslie <[Leslie@legallyleslie.com](mailto:Leslie@legallyleslie.com)>

Subject: Hello Leslie

You favourite internet troll here, I do hope you love the the Ode to you I posted on facebook 🤔🤔 🤔🤔

<https://www.facebook.com/groups/340750118547073/posts/706412358647512/>

PS

I don't think I can or will EVER forgive you Leslie, not after the VILE shit you posted about me in the "fake WTHs" group & who knows where!

--

Ania Waterman

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Ania Waterman

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Ania Waterman

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Ania Waterman

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Ania Waterman

--

Ania Waterman



attacking people from the get go & sincerely apologize PUPLICLY, then MAYBE, just MAYBE people will come around.

On Sat, 7 Jun 2025 at 00:30, Legally Leslie <[Leslie@legallyleslie.com](mailto:Leslie@legallyleslie.com)> wrote:

Considering you initiated an attack against me and I had no idea who you were, you should only look to yourself to blame. You go around attacking people in the most hateful way and when someone you attack throw back the same punches you dished out, you play victim. Here is my advice, you do not want to be attacked, stop attacking people. I never knew you were nor would ever spend time attacking you. However, considering you began attacking me not knowing me, you should feel what your vile attacks against others feel like. Sad thing is I feel sorry for you.

Had you known me, I can promise you and I would have been friends. I truly do not know why you want to hurt me so bad. But I do not hate you nor wish harm for you. I truly hope one day, you might want to actually talk personally with me and we can both forgive each other for hurting each other.

[SUSCRIBE "Legally Leslie" aka "Hot Lips" on YouTube](#)

Peace & Happiness!

Legally Leslie, aka "Hot Lips"

I will get back to you as soon as I can. Until then, check out my weekly LIVE Stream Schedule.

Who Says We Have to be NORMAL? We can be everything we want to be in 1 life!!! Retired Lawyer by Day, Clown by Night!!! Join me weekly for entertainment & education for all ages. You will never be bored! Because I will never allow myself to get bored!!

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Sunday: LIVE @9pm EST Hot Lips Night Night Stories

Contact: [Leslie@ LegallyLeslie.com](mailto:Leslie@LegallyLeslie.com)  
[www.LegallyLeslie.com](http://www.LegallyLeslie.com)

---



From: Double Karma <[doublekarma77@gmail.com](mailto:doublekarma77@gmail.com)>  
Sent: Friday, June 6, 2025 10:06 PM  
To: Legally Leslie <[Leslie@legallyleslie.com](mailto:Leslie@legallyleslie.com)>  
Subject: Re: Hello Leslie

email or facebook messenger are preferred & easiest for me to 'talk' .... lol ... (the pitfalls of Autism) ..... there you go, go spil the gossip to Lisa & take the piss

On Sat, 7 Jun 2025 at 02:48, Legally Leslie <[Leslie@legallyleslie.com](mailto:Leslie@legallyleslie.com)> wrote:

Which messenger do you use. Do you have whats app? So we can actually speak verbally. I think we should speak verbally, so you can hear me genuinely apologize for any hurt I caused you. I think it means more when you can hear my voice. I am open to whatever you are comfortable with.

[SUSCRIBE "Legally Leslie" aka "Hot Lips" on YouTube](#)

Peace & Happiness!  
Legally Leslie, aka "Hot Lips"

I will get back to you as soon as I can. Until then, check out my weekly LIVE Stream Schedule.

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Retired Lawyer by Day, Clown by Night!!! Join me weekly for entertainment & education for all ages. You will never be bored! Because I will never allow myself to get bored!!

which I am allowed to do, so if people want to believe I evaded disbarment or was about to be disbarred, they can believe that. It is irrelevant to the work I do now and the clients who love me, as they know I give quality work.

Again, I would like you to know really who I am and give me a fair chance. I apologize to you for anything I said hurtful. I sincerely apologize.

[SUSCRIBE "Legally Leslie" aka "Hot Lips" on YouTube](#)

Peace & Happiness!  
Legally Leslie, aka "Hot Lips"

I will get back to you as soon as I can. Until then, check out my weekly LIVE Stream Schedule.



From: Double Karma <[doublekarma77@gmail.com](mailto:doublekarma77@gmail.com)>  
Sent: Friday, June 6, 2025 9:45 PM  
To: Legally Leslie <[Leslie@legallyleslie.com](mailto:Leslie@legallyleslie.com)>  
Subject: Re: Hello Leslie

Am happy to do messenger

On Sat, 7 Jun 2025 at 02:40, Legally Leslie <[Leslie@legallyleslie.com](mailto:Leslie@legallyleslie.com)> wrote:

We can privately zoom or you can call me at 407-919-3939. I really think you ar need to get to know each other. We have both hurt each other & I sincerely apologize for my role in that. But I really think you and I could be friends if we k each other.

[SUSCRIBE "Legally Leslie" aka "Hot Lips" on YouTube](#)

Peace & Happiness!  
Legally Leslie, aka "Hot Lips"

I will get back to you as soon as I can. Until then, check out my weekly LIVE St Schedule.

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Thursday: LIVE @9pm EST Hot Lips Night Night Stories  
Friday: LIVE @9pm EST Hot Lips Night Night Stories

From: Double Karma <[doublekarma77@gmail.com](mailto:doublekarma77@gmail.com)>  
Sent: Saturday, June 7, 2025 9:58 PM  
To: Legally Leslie <[Leslie@legallyleslie.com](mailto:Leslie@legallyleslie.com)>  
Subject: Re: Hello Leslie

Well, here I am again, STILL willing to talk to you Leslie.

Ania Waterman

On Sat, 7 Jun 2025, 14:38 Double Karma, <[doublekarma77@gmail.com](mailto:doublekarma77@gmail.com)> wrote:

Tell me Leslie

HOW CAN I TRUST YOU AGAIN?

You want to say I'm "not showing the proper timeline"

OK, YOU GOT IT .... I've since posted the EXACT email timeline, all bar the last 1 you sent

What do you want me to do?

- Get on my knees & kiss your feet? Lisa's feet? Bruce's feet? etc
- Turn my back & betray people I've watched (on youtube) for the past 4-5 years?
- Be your Human Sacrifice to appease whatever deity you guys worship?

On Sat, 7 Jun 2025 at 11:53, Legally Leslie <[Leslie@legallyleslie.com](mailto:Leslie@legallyleslie.com)> wrote:  
Ania,

On Sat, 7 Jun 2025 at 11:05, Double Karma <[doublekarma77@gmail.com](mailto:doublekarma77@gmail.com)> wrote:  
I ALREADY posted the relevent emails Leslie & in the right time line.

but you just seem to wnt to fuck with me

On Sat, 7 Jun 2025 at 10:54, Legally Leslie <[Leslie@legallyleslie.com](mailto:Leslie@legallyleslie.com)> wrote:

Let me know which ones you do not want out publicly. I have no intention of causing you stress. If you send an email you do not want posted. Write in caps CONFIDENTIAL. I will honor your request

[SUSCRIBE "Legally Leslie" aka "Hot Lips" on YouTube](#)

Peace & Happiness!  
Legally Leslie, aka "Hot Lips"

I will get back to you as soon as I can. Until then, check out my weekly LIVE Stream Schedule. Who Says We Have to be NORMAL? We can be everything we want to be in 1 life!!! Retired Lawyer by Day, Clown by Night!!! Join me weekly for entertainment & education for all ages. You will never be bored! Because I will never allow myself to get bored!!

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Sunday: LIVE @9pm EST Hot Lips Night Night Stories

Contact: Leslie@ LegallyLeslie.com  
[www.LegallyLeslie.com](http://www.LegallyLeslie.com)

---

From: Double Karma <[doublekarma77@gmail.com](mailto:doublekarma77@gmail.com)>

Sent: Saturday, June 7, 2025 5:34 AM

To: Legally Leslie <[Leslie@legallyleslie.com](mailto:Leslie@legallyleslie.com)>

Subject: Re: Hello Leslie

Not all our emails need to be put out in public

On Sat, 7 Jun 2025 at 10:23, Legally Leslie <[Leslie@legallyleslie.com](mailto:Leslie@legallyleslie.com)> wrote:

Ania,

---

From: Legally Leslie <[Leslie@legallyleslie.com](mailto:Leslie@legallyleslie.com)>

Sent: Friday, June 6, 2025 9:18 PM

To: Double Karma <[doublekarma77@gmail.com](mailto:doublekarma77@gmail.com)>

Subject: Re: Hello Leslie

I have never called anyone those names. Please show me the video where I did. I am very careful to not call names like that. I think I am being accused as I am because of those who I have interviewed or appeared on shows with. If you actually listen to my words, not their you will know I would never say what your suggesting.

If you believe this, please share where I did this, because I would never call people those names. And if I did say such a thing, I would absolutely publicly apologize. I can admit when I am wrong. No one is perfect and I refuse to be a hypocrite. So if I did such, yes I will apologize.

I am not going to re-hash my retirement. I know the truth and have an affidavit sworn by my state bar. I practice under my husband license behind the scenes,

---

From: Double Karma <[doublekarma77@gmail.com](mailto:doublekarma77@gmail.com)>

Sent: Friday, June 6, 2025 8:36 PM

To: Legally Leslie <[Leslie@legallyleslie.com](mailto:Leslie@legallyleslie.com)>

Subject: Re: Hello Leslie

That is the problem Leslie you just don't want to admit it to yourself. I get you didn't want a black mark of disbarment on your Legal Career. Thus why you requested the Florida Bar to let you permanently retire.

Do I need to remind you of the TOTALLY VILE things you've posted about me?

You hvve a LOT of apologizing to many people to do. Jeremy & George, TUG, Megan, Shara, Jay Hip to name a few.

People CAN NOT just go around calling people VILE & VULGAR things, KNOWING FULL WELL, IT IS MALICIOUS & FALSE

Calling people a PDF file, R'pist, Child SA'er etc, THAT is 100% defamation.

NOTHING I've said has been vile or vulgar. You may not like 'us' saying you permanently retired to avoid disbarment & calling you muppet etc. That is NOTHING like defamation.

If you can genuinely admit, YOU were the one who came into the shit show,

I would never do that to you after I admitted my mistake. I really wish you and I could actually talk verbally. BTW, I ran my DNA and I am 40% scottish, 20% Irish, 20% English. Are you from Ireland?

[SUSCRIBE "Legally Leslie" aka "Hot Lips" on YouTube](#)

Peace & Happiness!

Legally Leslie, aka "Hot Lips"

I will get back to you as soon as I can. Until then, check out my weekly LIVE Stream Schedule.

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Sunday: LIVE @9pm EST Hot Lips Night Night Stories

Contact: Leslie@ LegallyLeslie.com  
[www.LegallyLeslie.com](http://www.LegallyLeslie.com)



---

From: Double Karma <[doublekarma77@gmail.com](mailto:doublekarma77@gmail.com)>

Sent: Saturday, June 7, 2025 6:25 AM

To: Legally Leslie <[Leslie@legallyleslie.com](mailto:Leslie@legallyleslie.com)>

Subject: Re: Hello Leslie

You happy now

Go run back to Lisa & the rest of group & laugh your fecking heads off

---

From: Double Karma <[doublekarma77@gmail.com](mailto:doublekarma77@gmail.com)>

Sent: Friday, June 6, 2025 9:31 PM

To: Legally Leslie <[Leslie@legallyleslie.com](mailto:Leslie@legallyleslie.com)>

Subject: Re: Hello Leslie

Sorry, I REALLY "HATE" being on camera to be BRUTALLY honest, I sound like a chipmonk (think of the cartoon back in the day)

On Sat, 7 Jun 2025 at 02:20, Legally Leslie <[Leslie@legallyleslie.com](mailto:Leslie@legallyleslie.com)> wrote:

If you want to go LIVE with me and we can work out our differences publicly, I am willing to do so and I will apologize for the wrongs I have done and would hope you would do the same.

[SUSCRIBE "Legally Leslie" aka "Hot Lips" on YouTube](#)

Peace & Happiness!

Legally Leslie, aka "Hot Lips"

I will get back to you as soon as I can. Until then, check out my weekly LIVE Stream Schedule.

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Wednesday: LIVE @ 12pm EST Troll Talk (Q&A Session to Address TROLLS Concerns)



I saw your FB post & my post that I made on YouTube was BEFORE the tail end of our email. You are not showing the proper timeline. Why are you doing this? I have been real with you and you are still not being real with me. I apologized publicly and never said anything bad about you. Please help me understand why you are doing this.

[SUSCRIBE "Legally Leslie" aka "Hot Lips" on YouTube](#)

Peace & Happiness!  
Legally Leslie, aka "Hot Lips"

I will get back to you as soon as I can. Until then, check out my weekly LIVE Stream Schedule.

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Saturday: LIVE @9pm EST Hot Lips Night Night Stories

Sunday: LIVE @9pm EST Hot Lips Night Night Stories

Contact: Leslie@ LegallyLeslie.com  
[www.LegallyLeslie.com](http://www.LegallyLeslie.com)

**From:** LESLIE FERDERIGOS <[leslieannferderigos@gmail.com](mailto:leslieannferderigos@gmail.com)>  
**Sent:** Friday, June 6, 2025 11:28 PM  
**To:** Double Karma <[doublekarma77@gmail.com](mailto:doublekarma77@gmail.com)>; Legally Leslie <[Leslie@legallyleslie.com](mailto:Leslie@legallyleslie.com)>  
**Subject:** Re: Hello Leslie

Anything you want to do. I feel awful for hurting you. I am crying in bed right now. You don't know how much it hurts me to know I hurt someone like this.

I was hurt seeing so many posts attacking people and I fell trap doing it myself

We aren't perfect, no one is. But what matter is when we can admit our wrongs with no justifications or excuses

I don't expect you to forgive me. But you need to know I admit I was wrong and I feel awful for hurting you.

I am not disclosing your autism to anyone. That is your choice and your privacy and not mine to say to anyone.

Get [Outlook for iOS](#)

**From:** Double Karma <[doublekarma77@gmail.com](mailto:doublekarma77@gmail.com)>  
**Sent:** Friday, June 6, 2025 11:24:37 PM  
**To:** Legally Leslie <[Leslie@legallyleslie.com](mailto:Leslie@legallyleslie.com)>  
**Subject:** Re: Hello Leslie

I KNOW, YOU KNOW, (giving Leslie, sassy side eye lol) that I watch some of your videos, caught the last few mins, of your live, gonna need to watch back.

I too am GEN Xer, someone I think you would flipping LOVE, she's on Insta is 'slim sherrri' <https://www.instagram.com/therealslimsherrri/>

Letting you know, I will be posting SOME of our convo on facebook ok?

On Sat, 7 Jun 2025 at 03:53, Legally Leslie <[Leslie@legallyleslie.com](mailto:Leslie@legallyleslie.com)> wrote:

I would never do that to you. I fight for the rights for those with disabilities. I have bipolar disorder. So you now know something very personal to me too

[SUSCRIBE "Legally Leslie" aka "Hot Lips" on YouTube](#)

Peace & Happiness!  
Legally Leslie, aka "Hot Lips"

I will get back to you as soon as I can. Until then, check out my weekly LIVE Stream Schedule.

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Contact: Leslie@ LegallyLeslie.com  
[www.LegallyLeslie.com](http://www.LegallyLeslie.com)

 Outlook

Re: Hello Leslie

**From:** Double Karma <[doublekarma77@gmail.com](mailto:doublekarma77@gmail.com)>  
**Date:** Sun 6/8/2025 5:49 PM  
**To:** Legally Leslie <[Leslie@legallyleslie.com](mailto:Leslie@legallyleslie.com)>

My position hasn't changed Leslie.

Why do you so badly wish to verbally talk to me? is it cos you want to record me & so twist my words?

I don't "hate you Leslie, even with your running off to Lisa to use my Autism against me, ... just like I said you would.

I just feel sad for you, I feel sad you WON'T let us in & get you the help you are so badly crying out for

On Sun, 8 Jun 2025 at 22:21, Legally Leslie <[Leslie@legallyleslie.com](mailto:Leslie@legallyleslie.com)> wrote:

I am willing to talk, but I feel like you change positions quickly. I think much could be understood, if we spoke verbally. Let me know

[SUSCRIBE "Legally Leslie" aka "Hot Lips" on YouTube](#)

Peace & Happiness!  
Legally Leslie, aka "Hot Lips"

I will get back to you as soon as I can. Until then, check out my weekly LIVE Stream Schedule. Who Says We Have to be NORMAL? We can be everything we want to be in 1 life!!! Retired Lawyer by Day, Clown by Night!!! Join me weekly for entertainment & education for all ages. You will never be bored! Because I will never allow myself to get bored!!

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Contact: Leslie@ LegallyLeslie.com  
[www.LegallyLeslie.com](http://www.LegallyLeslie.com)



Ania Waterman

June 7 at 7:39 AM · 🌐

You want a "proper timeline" Leslie?

HERE ..... YOU ..... FECKING ..... GO

[ I have had pretty short hair for a good while now, so NO I have not gone crazy ] ... See more

Hello Leslie

Double Karma

03:24 (10 hours ago)

☆

You have also referred to it here. I do hope you love the idea to you I posted on Facebook <https://www.facebook.com/groups/340735...>

Legally Leslie

03:30 (10 hours ago)

☆

Considering you decided on attack against me and I had no idea who you were, you should only look to yourself to blame. You go on...

Double Karma

03:35 (10 hours ago)

☆

That is the problem Leslie you just don't want to admit it to yourself. I get you didn't want a black mark of disreput on your Legal C...

Legally Leslie

03:39 (10 hours ago)

☆

I have never called anyone their names. Please show me the video where I did. I am very careful to not call names like that. I think I...

Legally Leslie

03:40 (10 hours ago)

☆

If you want to go LIVE with me and we can work out our differences publicly, I am willing to do so and I will apologise for the things I...

Double Karma

03:41 (10 hours ago)

☆

Sorry, I REALLY "HATE" being on camera to be BRUTALLY honest, I count like a chicken (think of the cartoon book in the dog)

Double Karma

03:41 (10 hours ago)

☆

I sent Leslie 5 screenshots of the VILE things she had posted in this group

Legally Leslie

03:42 (10 hours ago)

☆

We can privately zoom or you can call me [REDACTED] I really think you and I need to get to know each other. We have both hurt...

Double Karma

03:43 (10 hours ago)

☆

Ain't happy to do messenger

Legally Leslie

03:48 (10 hours ago)

☆

Which messenger do you use. Do you have what's app? Do we can actually speak verbally. I think we should speak verbally, so you c...

Double Karma

03:06 (10 hours ago)

☆

email or Facebook messenger are preferred & easiest for me to "talk" ... lol ... (the pitfalls of Autism) ... thank you go, go spit the go...

Legally Leslie

03:53 (10 hours ago)

☆

I would never do that to you. I fight for the rights for those with disabilities [REDACTED]

LESLIE FERDERIGOS

04:22 (10 hours ago)

☆

The last email I sent was kicked back so I'm emailing from my phone. Please check FB, I made a public video apologizing to you.

Double Karma

04:24 (10 hours ago)

☆

I KNOW, YOU KNOW (giving Leslie, sassy side eye lol) that I watch some of your videos, caught the last few mins. of your live, g...

LESLIE FERDERIGOS

04:28 (10 hours ago)

☆

Anything you want to do. I feel awful for hating you. I am crying in bed right now. You don't know how much it hurts me to know I f...

LESLIE FERDERIGOS

04:28 (10 hours ago)

☆

You can post anything you want. I am about honesty and transparency

Legally Leslie

10:23 (49 minutes ago)

☆

Asia, I saw your FB post & my post that I made on YouTube was BEFORE the tail end of our email. You are not showing the peop...

Double Karma

10:27 (45 minutes ago)

☆

Not all our emails need to be put out in public Leslie Ania Waterman

Legally Leslie

10:34 (16 minutes ago)

☆

Let me know which ones you do not want out publicly. I have no intention of causing you stress. If you send an email you do not w...

11:05 (31 minutes ago)

☆

sted the relevent emails Leslie & in the right time line.

ern to want to fuck with me

11:25 (11 minutes ago)

☆

Lisa & the rest of group & laugh your fecking heads off

**On or about May 27, 2025 until present,** Megan Fox & That Umbrella Guy continue to report that Leslie Ferderigos retired to evade disbarment, despite being emailed The Florida Bar's sworn affidavit that evidences this is false. Megan Fox proceeds to claim she spoke to the Florida Bar and that Leslie retired to evade disbarment. She proceeds to call Leslie Ferderigos a crazy bitch and both her and That Umbrella Guy, make comments about Leslie Ferderigos mental health, claiming she is off her meds and crazy.

IN THE CIRCUIT COURT OF 9<sup>TH</sup> JUDICIAL CIRCUIT OF  
ORANGE COUNTY, FLORIDA

LESLIE FERDERIGOS,  
Plaintiff,  
v.

Case No. **2025-CA-004528**

JEREMY HALES,  
ELEPHANT SHOE, LLC.  
MARTHA GEORGE RIZK, aka GEORGE HALES  
JOHN DOE (aka RAY HIP),  
and JOHN/JANE DOES 1-10,  
Defendants.

**NOTICE OF EXHIBITS IN SUPPORT OF DEFENDANT JEREMY HALES  
INTENTIONALLY ALLOWING “HATE GROUPS” UNDER WHAT THE HALES &  
HIRED INTERNATIONAL CAMPAIGN MEANT TO HARASS AND DEFAME**

PLEASE TAKE NOTICE of Exhibits in Support of Defendant, Jeremy Hales intentionally allowing “Hate & Harassment” groups under “What the Hales” logo despite being noticed and informed and overt actions to recruit international campaign from others outside the U.S.

**CERTIFICATE OF SERVICE**

WE DO CERTIFY, that a copy of the foregoing has been furnished electronically with the Clerk of Courts by using the EPORTAL system, all parties of record.

6/15/25  
Dated

/s/ Michael Ferderigos  
Michael Ferderigos, Esq.  
Bar No.: 604011  
10454 Birch Tree Lane  
Windermere, FL 34786  
Telephone 407-592-0035  
mferderigos@gmail.com  
michael@civilestatelaw.com

# Exhibit A



Spotify - Web Player: Music for everyone

<https://open.spotify.com/show>



## Legally Leslie LIVE "Divorce, Custody, Parental Alienation"

A former family law attorney pulls back the curtain on what really happens in divorce courts – and why your next moves could impact your children's lives ...



WordPress.com

<https://leslieannlaw.wordpress.com>



## Lawyer Leslie - WordPress.com

Dec 29, 2019 – (a/k/a Leslie Ann Ferderigos, Esquire & Former Alienated Mother) ...

For more information, **contact Leslie at [Leslie@leslieannlaw.com](mailto:Leslie@leslieannlaw.com)** or 407-371- ...



iHeart

<https://www.iheart.com/269-legally-leslie-272586346>



## Legally Leslie

In this episode, **Legally Leslie**, interviews investigative reporter, Michael Volpe, as they dive deep into the explosive legal drama surrounding **Jeremy Hale\$**, ...



TikTok



Office of Governor Ron DeSantis

<https://www.flgov.com/files/executive-orders>

PDF



## STATE OF FLORIDA

**Jeremy Hales** for violations of a stalking injunction and temporary injunction; and. WHEREAS, the Honorable BRIAN S. KRAMER has also advised the Governor that ...



YouTube · What The Hales

76.6K+ views · 1 month ago



## BAD NEIGHBOR FINALLY TELLS THE TRUTH

Interview regarding **Jeremy Hales** Lawsuits from "What the Hale\$". **Legally Leslie** (aka "Hot Lips" LOL) • 520 views · 24:55. Go to channel ...



X

<https://twitter.com/search?q=#LegallyLeslie>

## [#LegallyLeslie - Search / X](#)

**Legally Leslie, aka "Hot Lips" ...** @MeganFoxWriter. · May 20. I got a cease and desist telling me to stop saying Legally Leslie looks like a muppet.



YouTube · Megan Fox

18K+ views · 3 weeks ago

## [SUE JEREMY HALES? ARE THEY CRAZY???](#)

We have a new lawsuit that has hit the docket today it is quite the exercise in futility it is pretty hilarious.

Missing: [leslie](#) | Show results with: [leslie](#)



Instagram · whatthehales1

100+ likes · 3 weeks ago

## [What The Hale\\$ | SHE WILL BE IN COURT... Bully ...](#)

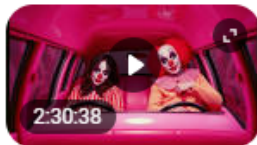
17m **Leslie** Ferderigos IS Busted!! in She SUED Hale\$ while posting videos comparing him Charles Manson. Posting him KKK hat.



YouTube · Shizzywhiznut

5.6K+ views · 2 weeks ago

## [THE LEGALLY LIPS FILES: Behind the Botox, Lawsuits & Lies](#)



She said she just showed up. She said she was neutral. She said she was "ADA protected." But the receipts tell a different story... and ...



Facebook · What The Hales

1 comment · 1 month ago

## [Leslie Ann Ferderigos\\*\\*\\*\\*, \[REDACTED\]](#)

I've heard many rumors. The facts are clear to me. She permanently retired from the Bar, and is now banned from practicing law in Florida. She ...



x.com

<https://x.com/hashtag/LegallyLeslie>

## #LegallyLeslie - Search / X

I got a cease and desist telling me to stop saying **Legally Leslie** looks like a muppet. I rest my case.  
#LegallyLeslie #LegallyLips.



YouTube · Megan Fox

19K+ views · 3 weeks ago

## What The Hales! LEGALLY LIPS SUES EVERYBODY?! ...

The cast of weird Muppet characters is growing by the day. **Legally Lips** sued **Jeremy Hales** and "Ray" Jay Hip for mocking her muppety ...



Facebook · What The Hales

120+ comments · 4 weeks ago

## Legally Leslie's message to Jeremy backfires

**LEGALLY LESLIE SENT JEREMY BY THE SOUNDS OF IT .HE REPLYED GAME ON .SHES SAYING THIS IS NOT WHAT I Wanted LOL. SHES TRING TO BACK OUT LOL.**



X · MeganFoxWriter

130+ likes · 3 weeks ago

## Megan Fox on X: "Legally Leslie did this to me. She's lucky the ...

**Legally Leslie did this to me.** She's lucky the only thing I did in response was to call her a muppet. She distributed revenge porn someone ...



Facebook · OTTER CREEK, FL & THE SHADY'ER BUNCH (UNCENSORED)

10+ comments · 6 days ago

## Legally Leslie (aka "Hot sister who haven't spoken ...

... **Legally Leslie** (aka "Hot Lips" seriously cannot believe people would do such thing.  
The good thing my family is seeing how these people are ...



YouTube · Shizzywhiznut

3.2K+ views · 2 weeks ago

## OPEN LETTER TO LEGALLY LIPS: "The Process Server ...



A full-blown lawsuit against a process server. Not a burglar not a stalker not a masked intruder breaking into your Botox bunker.





Facebook · What The Hales

40+ comments · 3 weeks ago



### [Legally Lips and Paint Chips not being lawyers ...](#)

Fleasa, STOP saying **Legally Lips** and Paint Chips are lawyers! They're NOT! One is a disbarred felon and the other is "permanently retired!"



Facebook · OTTER CREEK, FL & THE SHADY'ER BUNCH (UNCENSORED)

3 days ago



### [Lips to have a live I think you need more peeps other than ...](#)

For \$500 per person (60 minutes, up to 6 people), it's an intimate, interactive encounter you'll never forget. This 150-acre ranch is more than ...



X · ThatUmbrella

3 weeks ago



### [ThatUmbrellaGuy on X: "RT @robbiehart21: What The Hales ...](#)

RT @robbiehart21: What The Hales! **LEGALLY LIPS SUES EVERYBODY?!** AND NEW FILING!  
<https://t.co/a7r0Oro9PA> via @YouTube Oh no..not the big one...



Facebook · What The Hales

10+ comments · 1 week ago



### [Hey Leslie aka lips. If you was smart you'd drop the whole ...](#)

**Legally Leslie** seems hot on the trail for **Ms Weeks**. 2Lees have a post of what all in the Hales case is incorrect and not considered ...



X · Bingobrewtea

2 weeks ago



### [Bingobrewtea on X: " THE LEGALLY LIPS FILES: Behind the ...](#)

**THE LEGALLY LIPS FILES:** Behind the Botox, Lawsuits & Lies. She said she just showed up. She said she was neutral. She said she was "ADA ...





Facebook  
Leslie Ann Ferderigos ...



X  
LegallyLeslie - Searc...



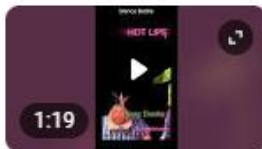
Rumble  
SUE JEREMY HALES?! ARE THEY CRAZY???

## Videos :



Exclusive Interview: Leslie Lips Otherwise Known As ...

YouTube · DJ\_Rattis  
1 week ago



@LegallyLeslie #HotLips

YouTube · Hot Lips  
1 week ago



THE LEGALLY LIPS FILES: Behind the Botox, Lawsuits & Lies

YouTube · Shizzywhiznut  
3 weeks ago

Feedback



## Legally Duckface "Lips / Leslie Ferderigos

Public group · 27 members

Join group

Share



About Discussion Featured People Media Files



Write something...



Anonymous Post

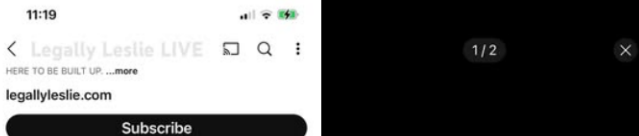


Feeling/activity



Jaye Cloud

1h ·



Shorts Live Podcasts Playlists Posts



Legally Leslie LIVE

14 minutes ago

What I cannot understand is, the truth speaks for itself. If the Hales position is so strong, why try and kill the

From: Michael Ferderigos michael@crackdownnews.com  
Sent: Monday, May 19, 2025 8:34 PM  
To: 'Legally Leslie LIVE' <legallyleslie@protonmail.com>  
Subject: Cease and Desist - Harassment and Cyberbullying Concerning Leslie Ferderigos  
Dear Ms. Fox,  
It has come to my attention that you have been making targeted comments and creating content about Leslie Ferderigos on your social channels. Specifically, we have observed behavior

1. Criminal and Civil Penalties:  
Violations of this and our work in criminal charges, including harassment or intent charges, depending on the severity and persistence of the conduct. Victims may also pursue civil remedies for damages caused by such actions.  
2. Demand to Cease and Desist:  
You are hereby demanded to immediately cease and desist from our further communication, either



Like



Comment



Send



Share



Comment as Ashley Page



I.W.S.Y.D.H.T.

1h ·



<https://www.facebook.com/groups/1215436793700192/files/fi...>

### About



Public

Anyone can see who's in the group and what they post.



Visible

Anyone can find this group.

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Complaint Filed - 19th May 2025.pdf

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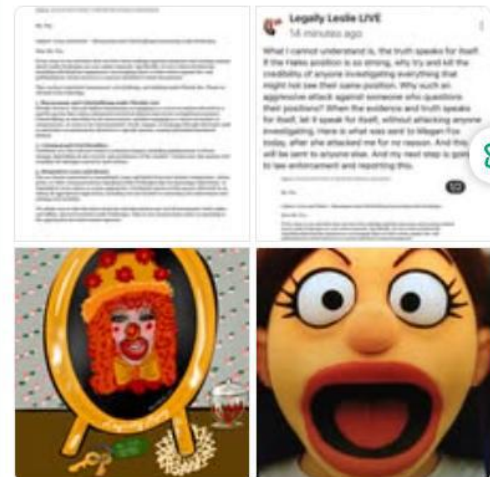


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YOUTUBE.COM

### SUE JEREMY HALES? ARE THEY CRAZY???

The nonsense never stops and the cast of characters that join the anti-What th...

Like

Comment

Send

Share



Comment as Ashley Page



André Cordeau

2h · 🌐



Her mugshot



Motion to Seal Case.

Uploaded on Mon · PDF



cover sheet ready to

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### Recent media



See all

Before I give myself another migraine, who is this pout trout and why is she sticking her nose into this?.

3 comments

Like Comment Send Share



Ania Waterman Admin

She a "PERMANENTLY RETIRED" Lawyer who is now part of the Anti WTH group

9h Like Reply Share

André Cordeau replied · 2 Replies 2h



Answer as Ashley Page

emojis smiley camera GIF



Ania Waterman

Admin · 8h ·

13th Oct 2022 - Disciplinary Aaction

The Florida Bar (Complainant)

Leslie Ferderigos (Respondent)

ACIS.FLCOURTS.GOV  
acis.flcourts.gov

1

Like Comment Send Share



Comment as Ashley Page

emojis smiley camera GIF



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PDF


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 Comment

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 Comment as Ashley Page






Ania Waterman


Admin · 9h · 





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Motion to Seal Case.pdf


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Ania Waterman


Admin · 9h · 





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Legally i  
54 minutes  
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will be sent to art  
to law enforcement



See all





Ania Waterman

Admin · 16h ·



## JH's claims against defendants by Legally Leslie

4 hours ago (edited)

...eases citing Florida Law on the claims Jeremy Hales has all...  
te these press releases after reviewing more evidence. I am l...  
nowledge so you can get an accurate understanding of these l...  
e types of cases in court. Everything I write is verified throug...  
made by Jeremy Hales, with the laws that apply to the claim

### ales YouTube Lawsuit: What the Law Really Says About Opinions, Reporting, Conspiracy"

...suits have raised big questions about whether YouTube creators, reporters, and...  
can be sued just for talking about a public figure and sharing opinions online...  
at federal and Florida law actually say—broken down simply, with real-world

#### u Get Sued for Sharing Your Opinion About a Public Figure?

wer: Not unless you lie on purpose.

r is famous or has a big online following—like a major YouTuber—they are legally a...  
give. "U.S. Supreme Court law (*New York Times Co. v. Sullivan*, 1964) says public...  
a's won a defamation lawsuit (that's when someone claims you hurt their reputation by...  
ria they prove you made a false statement on purpose or recklessly ignored the truth...  
led "actual malice."

t, "I think Jeremy is wrong for how he treats his neighbors," that's an opinion. Even i...  
agrees, that's not defamation.  
"Jeremy was convicted of a crime," and it's not true and you knew it wasn't true, tha...  
efamation.

*New York Times Co. v. Sullivan*, 376 U.S. 254 (1964).

#### about Opinions Based on Public Records?

ected—opinions and fair commentary are free speech.

me Court even says, "There is no such thing as a false idea." (*Gertz v. Robert Welch*,...  
) Only false statements about actual facts can be defamation. If you're giving your...  
ted on public documents—like court filings or YouTube videos someone posted...  
s—you're protected.

records show Jeremy's neighbor got a restraining order, you can say, "In my opinion...  
lot." You're allowed to interpret public info.

### 3. What If Two YouTubers or Reporters Talk About the Same Story? Is That a Conspiracy?

Not unless they're planning a crime or fraud together.

Florida law is clear: Just talking, agreeing on each other's claims, or sharing opinions—even...  
of you all disagree with the public figure—doesn't count as "conspiracy." There has to be a real...  
agreement to do something illegal, like commit fraud or defamation, not just to discuss an...  
arbitrary statement.

#### Example:

If two creators both cover the Jeremy Hales story, and one says "I agree with you," that's not...  
conspiracy.

If they secretly plan to commit lies to destroy someone's business, that could be conspiracy—that...  
just talking or reporting is not.

\**Clinton, Bruce v. Felling*, 901 So. 2d 1773 (Fla. 1st DCA 1997); *Blair v.*  
*Green, Ryan, Robert & Shumaker*, 636 So. 2d 648 (Fla. 5th DCA 1993).

### 4. What About Attorneys Talking to the Media?

Totally allowed and legal.

Attorneys often talk to reporters to explain their client's side, especially in high-profile cases...  
That's not conspiracy. It's part of the legal process.

### 5. Special Protections for the Media in Florida

Florida law gives the media extra protection:

- You must give the media a chance to correct or retract a statement before you can sue for...  
defamation. (*Florida Statute 770.01*)
- If they correct, damages are limited. (*Florida Statute 770.02*)
- Florida courts follow the "actual malice" rule for public figures, just like the federal courts...  
(*Miami Herald v. Am.*, 1984)
- Fair opinion is protected speech. (*First v. Telecommunity Democrat, Inc.*, 1983)

amendment.

king, collaborating, or even criticizing someone online—even with...  
and it's not conspiracy.  
designed to protect open discussion and reporting, even when pow...  
what's being said about them.

mation, see:

s Co. v. Sullivan, 376 U.S. 254 (1964)  
Welch, Inc., 418 U.S. 323 (1974)  
rain Journal Co., 497 U.S. 1 (1990)  
ub. Co. v. Ane, 458 So. 2d 239 (Fla. 1984)  
ssee Democrat, Inc., 400 So. 2d 52 (Fla. 1st DCA 1981)  
g, 702 So. 2d 1273 (Fla. 3d DCA 1997)

& State Trial & Appellate Attorney



**Print** 2025-DR-002182-O : FERDERIGOS, LESLIE vs. FERDERIGOS, MICHAEL

Case Header

Case Type: Dissolution of Marriage with Children

Date Filed: 2/27/2025

Location: Div 42

UCN: 482025DR002182A0010X

Judge: Mikaela Nix-Walker

Status: Pending

Citation Number:

Compliance Date:

Parties

Name	Type	Attorney	Phone
LESLIE FERDERIGOS	Petitioner		
MICHAEL FERDERIGOS	Respondent		

1 comment

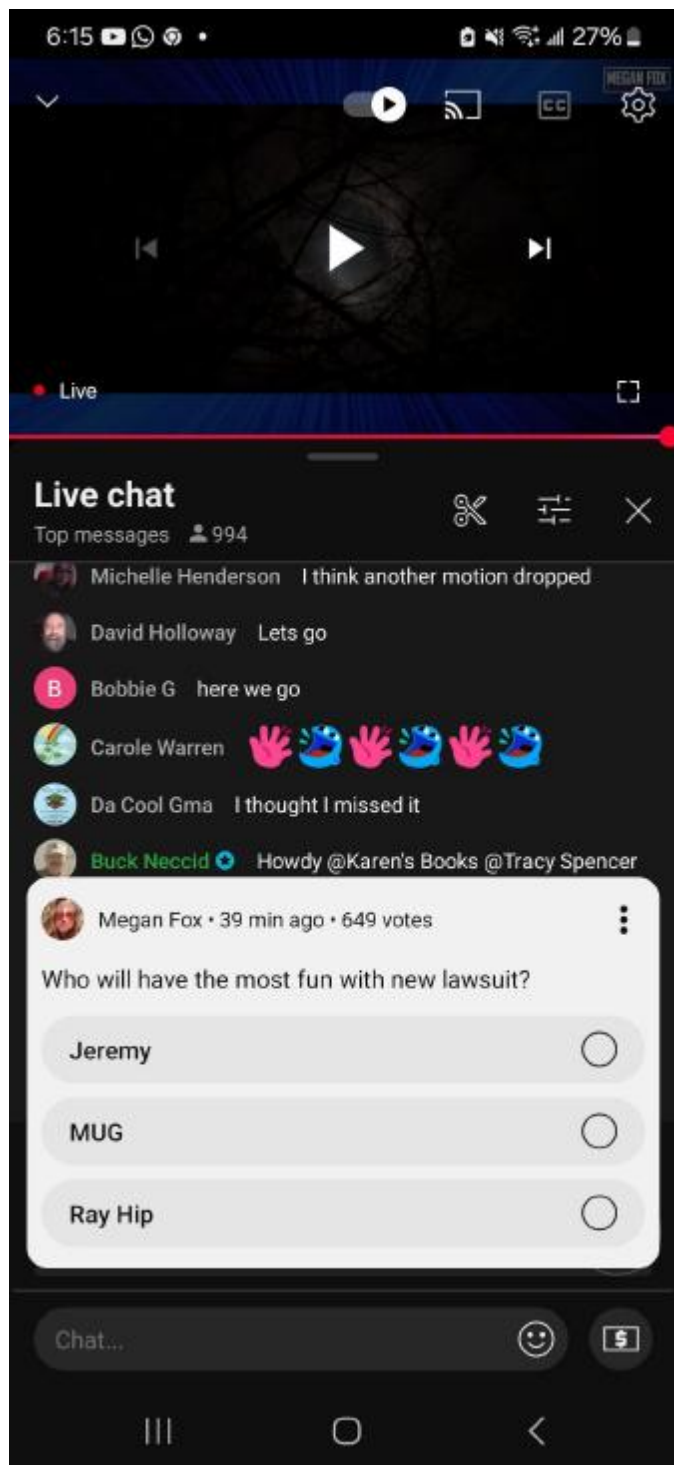
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### BAD NEIGHBORS, BAD LAWYER & BAD COPS - Odder Creek Update

45K views • Streamed 1 month ago

What The Holes

BAD NEIGHBORS, BAD LAWYER & BAD COPS - Odder Creek and Court Update OTTER CREEK, FL PUBLISHED ON: 04.24.2025



### BAD LAWYER DENIED AGAIN - Court Update

56K views • Streamed 2 days ago

What The Holes

BAD LAWYER DENIED AGAIN - Court Update Bad Lawyers Everywhere OTTER CREEK, FL PUBLISHED ON: 05.04.2025

Now



### BAD LAWYER WAS FIRED - Federal Court Update

59K views • Streamed 1 month ago

What The Holes

BAD LAWYER WAS FIRED - Federal Court Update Bad Lawyers Everywhere OTTER CREEK, FL PUBLISHED ON: 04.06.2025



### BAD LAWYER BULLIED LAWYER - Court Update

23K views • Streamed 2 weeks ago

What The Holes

BAD LAWYER BULLIED LAWYER - Court Update Bad Lawyers Everywhere OTTER CREEK, FL PUBLISHED ON: 04.20.2025



### BAD LAWYER BUSTED - Lying Liars Update

52K views • Streamed 9 days ago

What The Holes

BAD LAWYER BUSTED - Lying Liars Update Bad Lawyers Everywhere OTTER CREEK, FL. PUBLISHED ON: 04.27.2025 ...



### BAD LAWYERS UPDATE - Upcoming Court in Florida

53K views • Streamed 3 weeks ago

What The Holes

BAD LAWYERS UPDATE - Upcoming Court in Florida Bad Lawyers Everywhere OTTER CREEK, FL. PUBLISHED ON: 04.13.2025 ...



### LYING LAWYER GETS CAUGHT BY JUDGE

73K views • 3 weeks ago

What The Holes

Watch to the END to see what happens! Jeremy & George are back in Otter Creek for the Winter Season, fighting corruption at



### FEDERAL JUDGE IS FURIOUS WITH BAD LAWYER

17K views • 1 month ago

What The Holes

Watch to the END to see what happens! Jeremy & George are back in Otter Creek for the Winter Season, fighting corruption at



### LAWSUIT DROPPED - Bad Lawyers

70K views • Streamed 1 month ago

What The Holes

LAWSUIT DROPPED - Bad Lawyers Otter Creek and Court Update OTTER CREEK, FL. PUBLISHED ON: 03.23.2025 ...



### THEIR LAWYER HIDING - Court Update

57K views · Streamed 1 month ago

What The Hales

THEIR LAWYER HIDING - Court Update: OTTER CREEK, FL PUBLISHED ON: 03 DR 2025 DISCLAIMER: \*ThisTale is the largest ...



### HER LAWYER DODGING HIS FEDERAL COURT SUBPOENA

57K views · 2 months ago

What The Hales

Watch to the END to see what happens! Jeremy & George are back in Otter Creek for the Winter Season, fighting corruption and ...



### Ultimate What The Hales\$ Binge

What The Hales · Playlist · Updated today

BAD LAWYER DENIED AGAIN! - Court Update · 3:45:21

WAR VETERAN DIED & His Sister Abandoned His Storage Unit · 33:31

[View full playlist](#)



---

**From:** Michael Ferderigos <michael@civilestatelaw.com>  
**Sent:** Monday, May 19, 2025 8:56 PM  
**To:** meganfoxwriter@protonmail.com <meganfoxwriter@protonmail.com>  
**Subject:** CEASE & DESIST PRIOR TO REPORTING CRIMINAL HARASSMENT

Ms. Fox

Subject: Cease and Desist – Harassment and Cyberbullying Concerning Leslie Ferderigos

Dear Ms. Fox,

It has come to our attention that you have been making targeted comments and creating content about Leslie Ferderigos on your online channels. Specifically, we have observed behavior including ridiculing her appearance, encouraging others to take actions against her, and publicizing her recent lawsuit in a manner intended to incite harassment.

This conduct constitutes harassment, cyberbullying, and stalking under Florida law. Please be advised of the following:

**1. Harassment and Cyberbullying under Florida Law:**

Florida Statute § 784.048 defines harassment as engaging in a course of conduct directed at a specific person that causes substantial emotional distress and serves no legitimate purpose. Cyberstalking, as described in the same statute, includes engaging in a course of conduct to communicate, or cause to be communicated, words, images, or language through electronic mail or electronic communication, directed at a specific person, causing substantial emotional distress.

**2. Criminal and Civil Penalties:**

Violations of § 784.048 may result in criminal charges, including misdemeanor or felony charges, depending on the severity and persistence of the conduct. Victims may also pursue civil remedies for damages caused by such actions.

**3. Demand to Cease and Desist:**

You are hereby instructed to immediately cease and desist from any further commentary, online posts, or other communications regarding Leslie Ferderigos that are harassing, defamatory, or intended to incite others to action against her. Continued actions of this nature will result in us taking all appropriate legal action, including but not limited to contacting law enforcement and seeking civil remedies.

We advise you to take this letter seriously and discontinue any and all harassment, both online and offline, directed towards Leslie Ferderigos. This is your formal notice prior to reporting to the appropriate law enforcement agencies.

Best Wishes,  
*Michael Ferderigos*  
MICHAEL FERDERIGOS, ESQ.



YouTube · What'cha Doing Willis?

12K+ views · 1 month ago



## WHAT THE HALES THE CHICKENS ARE GONE WILLIS

Interview regarding **Jeremy Hales** Lawsuits from "What the Hale\$". **Legally Leslie** (aka "Hot Lips" LOL)•478 views · 21:08. Go to channel ...



X · MeganFoxWriter

130+ likes · 3 weeks ago



## Megan Fox on X: "Legally Leslie did this to me. She's lucky the ...

Legally Leslie did this to me. She's lucky the only thing I did in response was to call her a muppet. She distributed revenge porn someone ...



Facebook

Coming soon. The series of interviews...



YouTube

Exclusive Interview: Leslie Lips



YouTube

Gingerbread Diss)" – DJ Rattis vs ...

## What The Hales

Public group · 5.6K members



# WHAT THE HALES\$

## Vhat The Hales

Public group · 5.6K members



Tracey Norris

Top contributor · Yesterday at 3:00 AM ·



HOW DO YOU WANNA PLAY THIS GAME .SHALL I FINISH IT SO THE REAL ASSHOLES OUT HERE CAN PLAY SATIRE WITH THEM. SEEING IT SEEMS THERES NO LIMIT TO YOUR VENDICTIVE POSTS.POOR YOU THERES SO MANY ANNOS THAT HAVE FUELED THAT LITTLE LIGHT UNDER ME TODAY.







Scammersdontwin

Top contributor · 9h ·



**Have you noticed Leslie like a seagull It's all about me me me me Notice there's nothing about Crook or Liesnuts it's all about Leslie.**

19

10 comments



Rosalyn Duke · Follow

All-star contributor · 2h ·



Thanks for admitting you are false reporting.



LaurieG

I'm reporting the videos and the channels as being part of cyber-bullying and cyberstalking campaign

11

4 comments



Anonymous participant

10h · 🌐



**Who here thinks Leslie is Hodunk?**



15

13 comments



**Gina Fitzgerald**

All-star contributor · 13h ·



LIPS is on her you tube having another crazy episode. She it going on about blaming Jeremy for wanting to un alive her self. She made her own Adult decision to join the Crazy Train..

Lips truly needs some mental interventions.

THE RED FLAGS ARE FLYING ALL OVER HER YOU TUBE STREAM. ... [See more](#)

14

20 comments



Like



Comment



Send



Share

View more comments



**Jennifer Whalley** All-star contributor

It's all BS

10h Like Reply Share



**Jennifer Whalley** All-star contributor

she is having a mental episode. every hour.

3h Like Reply Share Edited 2



Comment as George Brown





Anonymous participant

June 13 at 9:05 PM · 🌐





John D. Grems Jr.

All-star contributor · May 20 at 12:10 PM · 🌐

...

So, I guess I'm not understanding what is going on with this newcomer and permanently retired lawyer Leslie Ann Ferderigos. I've heard many rumors. The facts are clear to me. She permanently retired from the Bar, and is now banned from practicing law in Florida. She can not be re-admitted according to state bar rules, or Florida law? I'm unsure on the last one.

But, the rumors, I'm hearing is that she is mentally ill, or unstable or something. That she is so unstable that sh... [See more](#)



FLORIDABAR.ORG

### Florida Bar Member Profile

Discipline cases that are public record are posted below. Select the reference number to view the Supreme Court Order and other related documents. Members of the public may obtain information about any disciplinary histo...

i

👍 26

39 comments

👍 Like

💬 Comment

✉ Send

➦ Share



Anonymous participant

Yesterday at 1:25 AM · 🌐



**Bruce Matzkin may the fleas of a thousand  
camels infest your arse hole**

🤔 👍 ❤️ 17

14 comments



Anonymous participant

Yesterday at 2:29 AM · 🌐



Lips think i have found the reason for your brain fog and general dumbFukery

Silicone implant toxicity, often associated with "Breast Implant Illness" (BII), refers to a range of systemic symptoms that some individuals attribute to their silicone breast implants. While the exact link between implants and these symptoms is still being researched and not fully understood, many patients report experiencing symptoms like fatigue, joint pain, brain fog, and skin rashes after receiving silicone or saline implants. Some experts believe these symptoms may be due to an autoimmune







Stu Moran

June 12 at 12:09 PM · 🌐



Just got word that the ZOOM hearing didnt go too well for Jerry....

Expect a ranting and raving live any moment now!!!!

Poor Jerry, Poor Hodunks!



5

17 comments





DjRattis MusicMan

June 9 at 5:29 PM · 🌐



DJ Rattis - Sausage Lips



YOUTUBE.COM

DJ Rattis - Sausage Lips (The @LegallyLeslie Diss)

\*\*\* The Following Video Has AI Altered Content. Names, Voice ...

👍 😄 ❤️ 10

1

👍 Like

💬 Comment

✉ Send

➦ Share



## Support message



Today at 9:45 AM

**We have not removed the group you reported**

We use technology to help prioritize reports for review.

As our review team is focused on the most severe cases with potential for real world harm, we're not able to review your report.

We understand that this might be frustrating so we recommend exploring the options available to control what you see.

We'll let you know if there is an update on your report.

● 1 previous message

\*\*\*\*\*This is not conclusive of all posts and evidence\*\*\*\*\* there are 100s of posts meant to harass, defame, and invade Plaintiff's privacy\*\*\*\*\*



IN THE CIRCUIT COURT OF 9<sup>TH</sup> JUDICIAL CIRCUIT OF  
ORANGE COUNTY, FLORIDA

LESLIE FERDERIGOS,  
Plaintiff,  
v.

Case No. **2025-CA-004528**

JEREMY HALES,  
ELEPHANT SHOE, LLC.  
MARTHA GEORGE RIZK, aka GEORGE HALES  
JOHN DOE (aka RAY HIP),  
and JOHN/JANE DOES 1-10,  
Defendants.

**NOTICE OF EXHIBITS IN SUPPORT OF DEFENDANT JEREMY HALES**  
**DEFAMATORY PUBLISHED STATEMENTS DURING LIVE STREAMS**

PLEASE TAKE NOTICE of Exhibits in Support of Written Defamatory Statements made by  
Defendant, Jeremy Hales published during Jay Hipsters LIVE Stream

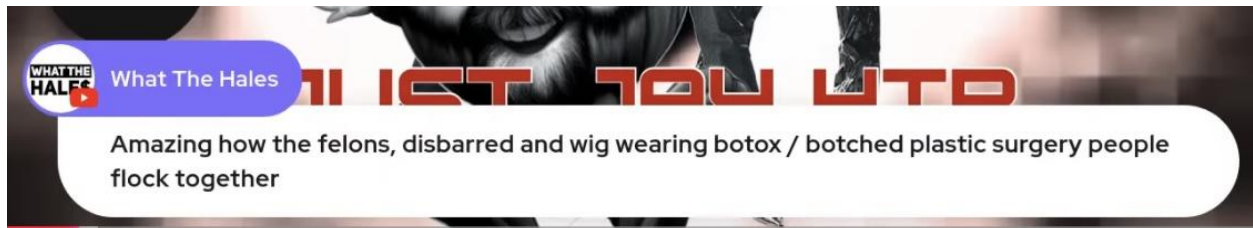
CERTIFICATE OF SERVICE

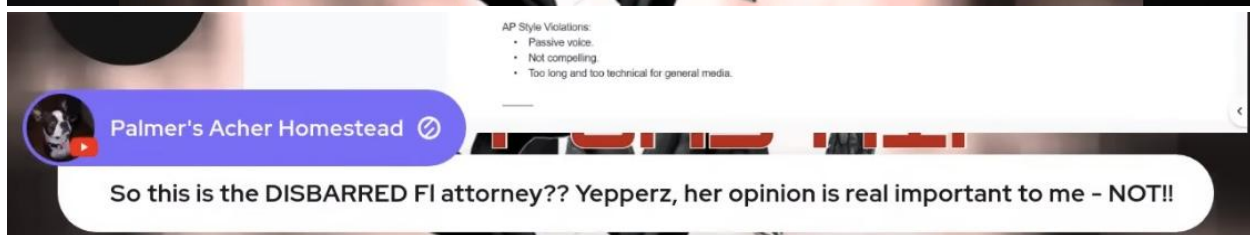
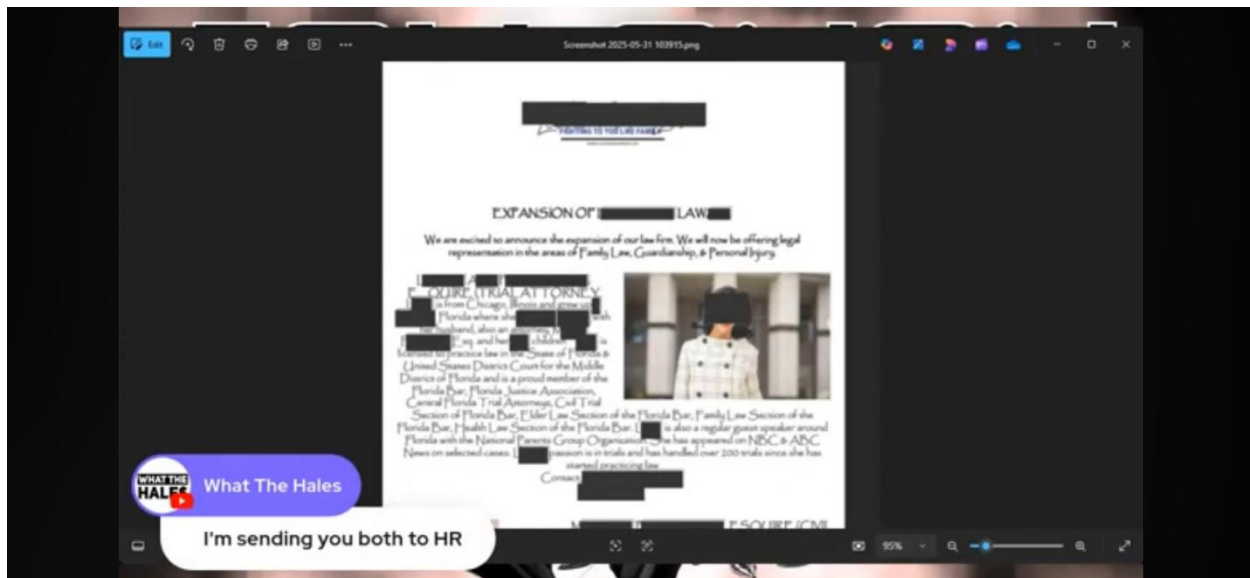
WE DO CERTIFY, that a copy of the foregoing has been furnished electronically with the  
Clerk of Courts by using the EPORTAL system, all parties of record.

6/14/25  
Dated

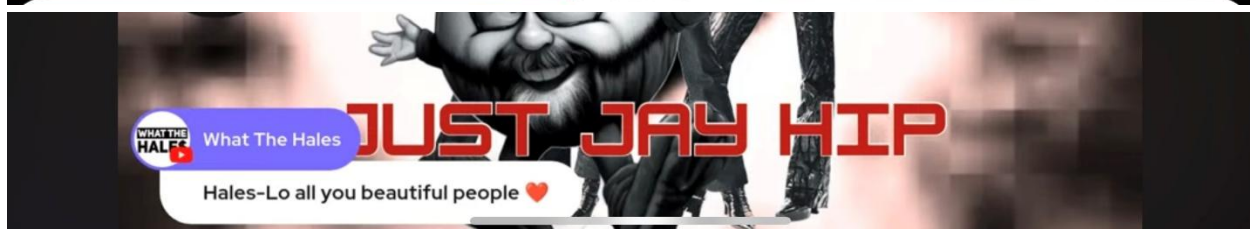
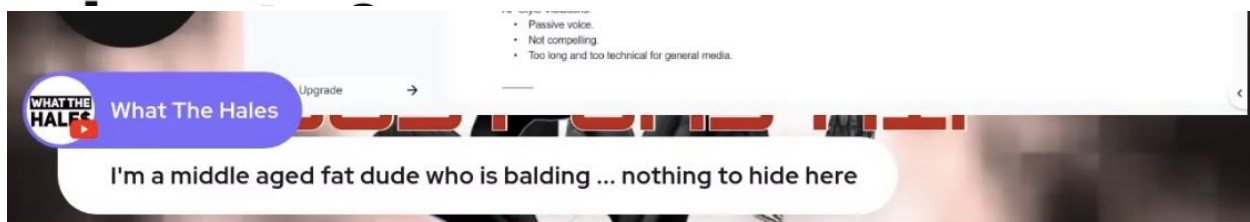
/s/ Michael Ferderigos  
Michael Ferderigos, Esq.  
Bar No.: 604011  
10454 Birch Tree Lane  
Windermere, FL 34786  
Telephone 407-592-0035  
mferderigos@gmail.com  
michael@civilestatelaw.com

EXHIBIT A – On or about May 21, 2025, during a LIVE they talk about “Lips”, who Jeremy Hales (What the Hales) & his fans call Leslie Ferderigos is their LIVE streams





## What the Hales\$ is wrong with this new





What The Hales

# JUST JAY HIP

Hales-Lo all you beautiful people ❤️

AP Style Violations:

- Passive voice.
- Not compelling.
- Too long and too technical for general media.



Palmer's Acher Homestead

So this is the DISBARRED FI attorney?? Yepperz, her opinion is real important to me - NOT!!



Muppet man Dewayne Rapp

Gifted 20 Just Jay Hip memberships

IN THE CIRCUIT COURT OF 9<sup>TH</sup> JUDICIAL CIRCUIT OF  
ORANGE COUNTY, FLORIDA

LESLIE FERDERIGOS,  
Plaintiff,  
v.

Case No. **2025-CA-004528**

JEREMY HALES,  
ELEPHANT SHOE, LLC.  
MARTHA GEORGE RIZK, aka GEORGE HALES  
JOHN DOE (aka RAY HIP),  
and JOHN/JANE DOES 1-10,  
Defendants.

**NOTICE OF EXHIBITS IN SUPPORT OF DEFENDANT JEREMY HALES**  
**INTENTIONALLY REMOVING HIMSELF FROM E-SERVICE TO NOT BE SERVED**  
**WITH EXHIBITS**

PLEASE TAKE NOTICE of Exhibits in Support of Defendant, Jeremy Hales intentionally removing himself from e-service

CERTIFICATE OF SERVICE

WE DO CERTIFY, that a copy of the foregoing has been furnished electronically with the Clerk of Courts by using the EPORTAL system, all parties of record.

6/14/25  
Dated

/s/ Michael Ferderigos  
Michael Ferderigos, Esq.  
Bar No.: 604011  
10454 Birch Tree Lane  
Windermere, FL 34786  
Telephone 407-592-0035  
mferderigos@gmail.com  
michael@civilestatelaw.com



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**Removal from Service List – Case Number 482025CA004528A0010X**

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**From** noreply@myflcourtagency.com <noreply@myflcourtagency.com>

**Date** Wed 6/11/2025 12:33 PM

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**Removal From Service List**

The following transaction was entered on 06/11/2025 12:33:24 PM ET.

**Court:** Judicial Circuit in and for Orange County, Florida  
**Case #:** 482025CA004528A0010X  
**Case Style:** FERDERIGOS, LESLIEvs.HALES, JEREMY et al.  
**Filer:** Other Attorney/Interested Party 'jeremy hales' added by 'LESLIE ANN FERDERIGOS'  
407-919-3939 has selected not to receive electronic service on this case

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**This information has been electronically mailed to:**

<b>Name</b>	<b>Primary Email</b>	<b>Alternate Email 1</b>	<b>Alternate Email 2</b>
LESLIE ANN FERDERIGOS	<a href="mailto:LESLIE@CIVILESTATELAW.COM">LESLIE@CIVILESTATELAW.COM</a>		<a href="mailto:leslie@civilestatelaw.com">leslie@civilestatelaw.com</a>
Michael Ferderigos	<a href="mailto:michael@civilestatelaw.com">michael@civilestatelaw.com</a>	<a href="mailto:mferderigos@gmail.com">mferderigos@gmail.com</a>	
MEGAN FOX	<a href="mailto:MeganFox.writer@protonmail.com">MeganFox.writer@protonmail.com</a>		
JAY HIPHER	<a href="mailto:justjayhip@gmail.com">justjayhip@gmail.com</a>		
Ninth Judicial Circuit	<a href="#">*****</a>		

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**Re: When Were Hales And Rizk And Elephant Shoes LLC Served In 2025-CA-004528-O Ferderigos Vs Hales Et Al? Ferderigos' Drama Drama Drama Drama Is Just Provoking And Feeding Hales' Trolls?**

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**From** Legally Leslie <Leslie@legallyleslie.com>

**Date** Sun 6/15/2025 12:23 PM

**To** Lion News <lionnews00@gmail.com>

Last thing, I really don't care at this point what Hales has going on elsewhere. But I do care about the defamation and online attack perpetrated against me that was initiated simply because I entertained a request to interview Michael Volpe about this, having no idea who Hales was nor cared. During that initial interview, I simply asked questions and was neutral. Immediately following Michael Volpe's publishing of that interview, I was brutally harassed. This was unwarranted and has continued ever since. Read the Court filed timeline, that I swear to with detailed evidence. You will see exactly when/date this campaign against me started and ever since I have been fighting back to stop it.

**[www.LegallyLeslie.com](http://www.LegallyLeslie.com)**

***For Real Legal Commentary***

SUBSCRIBE on YouTube & Rumble [@LegallyLeslieForReal](https://www.youtube.com/@LegallyLeslieForReal)

***For Satirical Depictions of Real Events***

SUBSCRIBE on YouTube & Rumble "HOT LIPS" at [@HotLipsbyLegallyLeslie](https://www.youtube.com/@HotLipsbyLegallyLeslie)

Peace & Happiness!  
Legally Leslie, aka "Hot Lips"

LEGALLY LESLIE WEEKLY LIVE STREAMS  
Tuesdays: LIVE "Jury Room" with Legally Leslie at 12pm EST

HOT LIPS WEEKLY LIVE STREAMING SCHEDULE  
Mondays: LIVE Watch me on "Two Lees in a Pod" on YouTube every Monday LIVE at 10pm EST for Mischief Mondays  
Tuesdays: LIVE every Tuesday from 10am EST - 12pm EST for JURY ROOM (reporting on the HALES Lawsuits)  
Wednesday: LIVE @ 12pm EST Troll Talk (Q&A Session to Address TROLLS Concerns)  
Friday: LIVE @8pm EST LIVE with HOT LIPS  
Sunday: LIVE @8pm EST LIVE with HOT LIPS

Contact: Leslie@ LegallyLeslie.com  
[www.LegallyLeslie.com](http://www.LegallyLeslie.com)



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**From:** Legally Leslie <Leslie@legallyleslie.com>

**Sent:** Sunday, June 15, 2025 12:11 PM

**To:** Lion News <lionnews00@gmail.com>

**Subject:** Re: When Were Hales And Rizk And Elephant Shoes LLC Served In 2025-CA-004528-O Ferderigos Vs Hales Et Al? Ferderigos' Drama Drama Drama Drama Is Just Provoking And Feeding Hales' Trolls?

Please know your email is being turned over to law enforcement to demonstrate the harassment, as a case is being opened. You are welcome to follow the Court case with filings to see the truth in what is going on. I have extensive evidence with a timeline of the attack initiated against me. The evading service/notice, is evading e-service/notice of evidence connecting Hales to the online cyberbullying attack that he continues to take himself off e-service. Formal service of the lawsuit has not been initiated because I need to amend the complaint a 3rd time to add new evidence. Service/Notice is not confined to Formal Service and notice of a lawsuit. You are missing the distinction.

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Contact: Leslie@ LegallyLeslie.com

[www.LegallyLeslie.com](http://www.LegallyLeslie.com)



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**From:** Lion News <lionnews00@gmail.com>

**Sent:** Sunday, June 15, 2025 11:39 AM

**To:** Legally Leslie <Leslie@legallyleslie.com>

**Subject:** When Were Hales And Rizk And Elephant Shoes LLC Served In 2025-CA-004528-O Ferderigos Vs Hales Et Al? Ferderigos' Drama Drama Drama Drama Is Just Provoking And Feeding Hales' Trolls?

Leslie Ferderigos aka Legally Leslie:

When were Hales, Rizk and Elephant Shoes LLC served In 2025-CA-004528-O Ferderigos vs Hales et al? Do you have actual documentation from a process server that will verify that they were served? Or is this just more of your drama, drama, drama, drama?? So-called researcher "Hot Lips" did you ever get a copy of Hales' sworn statements in the petition

([https://www.supremecourt.ohio.gov/docs/JCS/domesticViolence/protection\\_forms/stalkingForms/10.03D.pdf](https://www.supremecourt.ohio.gov/docs/JCS/domesticViolence/protection_forms/stalkingForms/10.03D.pdf)) for CV-2023-09-3595 Hales vs Preston? If your claim is that Hales weaponizes litigation, then where is your proof that Hales obtained the Ohio injunction under false pretense? Press Release = Unsubstantiated Drama! Drama! Drama! designed to provoke and feed Hales' troll, correct? If you are such an "expert," then why aren't you filing amicus briefs in Ohio and Florida instead of all the Drama! Drama! Drama!? Hmm? Inquiring minds want to know, don't they?

Terry Dean, Nemmers 320-283-5713

P.S. Did you notice that neither of your good buddies Hales nor Fox have mentioned my name even once recently? But, then again neither has your no talent buddy Sean Martin, right?

Morg Hickman: Mob's only as tough as its leader. You only got one man to lick: Bogardus. Tin Star, The (1957) Henry Fonda Morgan Hickman <https://www.stockq.org/moviescript/T/tin-star-the.php> The Tin Star 1957 Approved 1h 33m Top cast Henry Fonda Morgan Hickman Anthony Perkins Sheriff Ben Owens [https://www.imdb.com/title/tt0051087/?ref=fn\\_all\\_ttl\\_2](https://www.imdb.com/title/tt0051087/?ref=fn_all_ttl_2)

On January 19th, 2025 at approximately 1440 hours, I responded to 6251 SW SR 24 in reference to a violation of injunction complaint. Upon arrival, contact with the complainant, Jeremy Hales, who was actively videotaping our interaction. ... Later I had another opportunity to review the video footage from the incident. Jeremy stated at the opening of the video that, "unfortunately, it's time to drive past

these psychos”, however, there is an alternative route that Jeremy could travel, which would avoid Lynette’s residence completely (northbound on N Otter Creek Ave towards US 19). Jeremy’s Ohio protection order states that, “the court finds by a preponderance of evidence that 1) Respondent has knowingly engaged in a pattern of conduct that caused Petitioner to believe that Respondent will cause physical harm or cause mental distress; and 2) the following orders are equitable, fair, and necessary to protect the person named in this Order from stalking offenses”. Being Jeremy is apparently in fear that John Cook possibly cause “physical harm” or “mental distress”, it is peculiar why he would knowingly drive the most direct route toward their residence, instead of seeking an alternative direction to avoid them directly. ... Being that Jeremy is allegedly in fear that “physical harm” or “mental distress” may come to him as a result of interactions with John or Lynette, I found it odd that he would intentionally slow his driving speed while driving in front of the property. During the recording, it was witnessed that Jeremy was raising his recording device above his head/roof, outside of his vehicle. Lynette owns an approximate 6-foot tall privacy fence, which she uses to shield her property from the view of the public. Jeremy was witnessed intentionally trying to see over it, in order to garner a reaction from the inhabitants, and to witness elements within the property that were not easily witnessed from persons of the public at the roadway. ... Based upon Jeremy’s statements, the video provided, and the testimony of the subjects located at 151 N Otter Creek Ave, I have found no probable cause to believe a violation of the Ohio protection order has taken place. From all appearances, it seems as though Jeremy is trying to elicit a response from the parties involved, and is provoking them into possibly committing some type of violation. Jeremy does not seem to be in fear of physical attack, nor any type of mental anguish, as a result of being in such proximity to the subjects. From all evidence collected, Jeremy appears to be purposely interjecting himself into the lives of the other individuals. My interactions with all parties was recorded on my body-worn microphone, and my in-car video camera was operational as well. Those recordings are available through UDE if needed. A copy of the video footage collected was submitted to the “Files4Evid\$” folder, and attached as evidence to this report. Pages 4, 5. Original Narrative Author: Corporal D. MacIntyre #761 Date Created: 01/26/2025 2013 Hrs. Levy County Sheriff’ Office.

[https://www.youtube.com/channel/UC4LR\\_mjSIQ4QynWbeotB3bg/community?lb=UgkxiE7CltpvpUc3rIEJPaTAdEhINi7IYgc5](https://www.youtube.com/channel/UC4LR_mjSIQ4QynWbeotB3bg/community?lb=UgkxiE7CltpvpUc3rIEJPaTAdEhINi7IYgc5) Two Lee's In A Pod Two Lee's In A Pod 10 hours ago 06-15-25 FOR IMMEDIATE RELEASE: HALES' LAWSUITThe litigation before this Court is no different. Hales has weaponized the court system, turning legal filings into fodder for his videos, all while soliciting and receiving tens of thousands of dollars in donations under the guise of defending himself from “attacks.” This is not the conduct of a wronged individual seeking justice—it is the calculated strategy of a digital provocateur exploiting the legal system for views, influence, and profit.

<https://myeclerk.myorangeclerk.com/CaseDetails?cltem=NIbIG46ZkxO3QDRUBTZry9hcTTVNC3vKzyDoUvSgsQy8ODQoUwCplvS9c48l86Uh2Ju0CLWrz6pe0itN2NHPUqBnYOqMImKnv1KXPWJmOOY%3D>  
2025-CA-00452 8-O : FERDERIGOS, LESLIE vs.HALES, JEREMY et al. JEREMY HALES Defendant LESLIE FERDERIGOS Plaintiff LESLIE FERDERIGOS ELEPHANT SHOE, LLC Defendant MARTHA GEORGE RIZK GEORGE HALES AKA Defendant JOHN DOE RAY HIP AKA Defendant JOHN/JANE DOES 1-10 Defendant JASON HIPHER JAYHIP AKA Defendant JOHN DOE (THE UMBRELLA GUY) AKA Defendant MEGAN FOX Defendant

[https://www.law.cornell.edu/rules/frap/rule\\_29](https://www.law.cornell.edu/rules/frap/rule_29) Rule 29. Brief of an Amicus Curiae