IN THE CIRCUIT COURT OF 9TH 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 HIPSHER (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.

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

- 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.
- 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

- 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; her channel, which had only seven subscribers, was used solely for posting interviews at the request of acquaintances. PLAINTIFF now 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, where he routinely posts content about 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 of 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 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
- 5. MEGAN M. FOX (aka, MEGAN FOX), domiciled at Naples, NY, holds herself publicly as an investigative reporter, who works directly with DEFENDANT HALES, to ensure those who speak adversarial against DEFENDANT HALES are ostracized publicly in a a campaign that DEFENDANT HALES secures high views counts for.
- 6. JOHN DOE (aka "SHIZZYWIZNUT") domiciled unknown, holds himself publicly as a YouTube influencer, who works directly with DEFENDANT HALES, to ensure those who speak adversarial against DEFENDANT HALES are ostracized publicly in a a campaign that DEFENDANT HALES secures high views counts for.
- 7. JASON HIPSHER (aka "JAYHIP"), domiciled in Omaha, Nebraska, holds himself publicly as a YouTube influencer, who works directly with DEFENDANT HALES, to ensure those who speak adversarial against DEFENDANT HALES are ostracized publicly in a a campaign that DEFENDANT HALES secures high views counts for.
- 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.
- 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 3rd parties and has led to Injunctions for protection by various targeted 3rd parties, in which the DEFENDANT

HALES and DEFENDANT RIZK publicly mock on published videos. And where DEFENDANT HALES, has been found to violate past stalking injunctions, having no regard to the law.

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

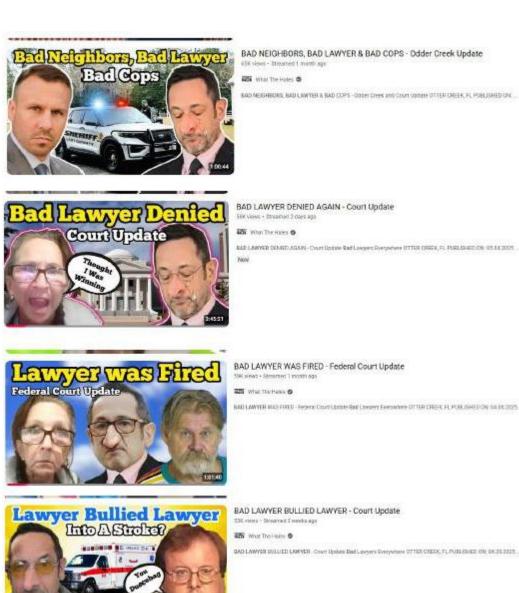
Office of Governor Ron DeSantis https://www.flgov.com > files > executive-orders PDF

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 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.

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 campaign.



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 Jeremy Hales and his associates, including, but not limited to, Defendants Megan Fox, Jay Hip, and others. 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 about a mutual acquaintance escalated rapidly, as Defendants weaponized their significant online following to publish and amplify hundreds of false, malicious statements about Plaintiff.

- 13. 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.
- 14. Despite Plaintiff's repeated efforts to correct the record and halt the harassment—including providing sworn affidavits from the Florida Bar—Defendants 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

- 15. Defendants 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 Hales with inflated followers, increased visibility, and monetary compensation, while punishing those who refuse to participate.
- 16. Data analysis shows that creators who align themselves with Hales, including Megan Fox, "That Umbrella Guy," and Jay Hipp, have experienced dramatic spikes in their online metrics 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

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.

- 17. 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.
- 18. 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.
- 19. 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.
- 20. 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

- 21. 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.
- 22. Plaintiff agreed to conduct the interview, maintaining neutrality and posing questions to the acquaintance in his capacity as a reporter. 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.
- 23. On April 27, 2025, Plaintiff emailed Defendant Fox to schedule an interview but received no response. On April 29, 2025, Plaintiff conducted the interview with the acquaintance, maintaining neutrality and objectivity throughout. On or about May 5, 2025, Plaintiff's acquaintance, undisclosed to Plaintiff until after it was published, published the interview with Plaintiff in a Facebook group titled "What the Hales." [EXHIBIT A – timeline exhibits]

- 24. On or about May 6, 2025, Ania Waterman, working for Defendant Hales from Ireland, began targeting and attacking Plaintiff online, while commenting she is in touch with Defendant Hales. Additionally, Defendant Hales made statements during live broadcasts that Plaintiff was sending Ania Waterman harassing emails. [EXHIBIT A Timeline]
- 25. On or about May 13, 2025, Plaintiff was 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. 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.
- 26. 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," 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. Additionally, these posts, upon search, are registered as international accounts, containing no true photographs, and only muppet or animal depictions. [EXHIBIT A timeline exhibits]
- 27. On or about May 15, 2025, members of the Facebook group began posting that Plaintiff is a disbarred attorney, among voluminous insults and harassment. This has continued to date. Comments imply Plaintiff is a transsexual, Plaintiff is crazy and off her meds, and Plaintiff just wants to grow her YouTube channel. Clients began calling Plaintiff to inform

her they are seeing the online attack against her and feel bad for her. 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 began receiving harassing emails from those endorsing Defendant Hales. Plaintiff provided all parties with the sworn affidavit from the Florida Bar; however, they continued to falsely state Plaintiff retired to evade disbarment and falsely posted the reasons for her retirement. These harassing emails continue to date. [EXHIBIT A – timeline exhibits][EXHIBIT E]

- 28. Plaintiff also witnessed parties Defendant Hales 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.]
- 29. 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 stated that he was not filing lawsuits for justice against various parties, did not care about court opinions, and was filing lawsuits solely to keep parties in his lawsuits tied up in court and to "drain and ruin them financially." Defendant Hales expressly stated that litigation was 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. 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.

- 30. On or about May 16, 2025, Megan Fox, That Umbrella Guy, and Jay Hip began to go live in front of thousands of people, stating and mocking Plaintiff as a failed attorney who retired to evade disbarment. Plaintiff was subsequently invited by YouTube reporters, who were also named as defendants in Defendant Hales' federal lawsuits, to participate in their shows following the online harassment attack she had been victim of. Plaintiff conducted another interview in which these YouTube reporters, and during interviews, notified Plaintiff that they were being attacked by Defendant Hales, causing them harm and needing to voice their side of the events publicly to provide rebuttal material to that which was circulating throughout online forums.
- 31. 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.
- 32. <u>On or about May 16, 2025</u>, 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 gave it to Lisa Weeks, Supa Dave, Bruce, Rich Luthmann, Attorney Bruce, and 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 and making it clear it was satire.
- 33. <u>On May 18, 2025</u>, Defendant Hipsher hosted a live YouTube broadcast during which he mocked Plaintiff's appearance and falsely stated that she retired to avoid disbarment.

- 34. <u>On May 19, 2025</u>, Defendant Hales and Defendant Rizk hosted a live video on their YouTube channel, 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."
- 35. <u>On May 19, 2025,</u> Plaintiff filed a lawsuit, later amending it to name Jeremy Hales, Jay Hip, and George Hales after sending Defendant Fox a cease and desist in which Fox responded by calling the attorney a "Dummy." [EXHIBIT B Notice of Google search, etc.]
- 36. <u>On or about May 21, 2025,</u> hate groups mocking Plaintiff were created on Facebook, where Plaintiff's physical appearance was mocked, with her name tagged publicly. Megan Fox hosted a live broadcast making a mockery out of Plaintiff's lawsuit against everyone, encouraging an audience, while posting personal family law cases involving Plaintiff. [EXHIBIT C]
- 37. On or about May 21, 2025, during Jay Hip's live broadcast with Megan Fox, Jeremy 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.

- 38. 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. Plaintiff deleted every one of her social media accounts to evade the attack. However, they continued to attack her on multiple social media forums during live and Facebook posts and emails directly sent to her following this. [EXHIBIT A Timeline]
- 39. On or about May 26, 2025, and subsequent to Plaintiff filing her initial complaint against Defendants Hales, Rizk, and Hip, Defendant Fox and Defendant Umbrella Guy began 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.
- 40. Defendant Fox stated that Plaintiff created revenge porn about Defendant Fox, resulting in Plaintiff receiving voluminous hate emails to her work.[1]¹

¹ [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.

- 41. <u>On May 27, 2025</u>, Plaintiff amended her complaint to add Megan Fox and That Umbrella Guy after witnessing them making statements to imply she retired to evade disbarment.
- 42. On May 27, 2025, Plaintiff opened a YouTube channel for the purpose of having her own voice against those who were attacking her. Plaintiff began making satirical videos mocking those who were attacking and spreading false statements about her. [EXHIBIT A Timeline]
- 43. 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. Plaintiff was forced to delete all her social media accounts to avoid seeing these "hate sites," and clients began to ask her why such sites were being published against her. 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." 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.
- 44. <u>On or about June 3, 2025</u>, supporters of Hales, in contact with him, began to harass Plaintiff's children and family. [EXHIBIT A – Timeline]
- 45. <u>On June 7, 2025,</u> YouTube influencer DJ Rattis, who is endorsed by Hales and makes money from his YouTube channel, and who is domiciled in Australia, 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]

- 46. Plaintiff reported this to YouTube and 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]
- 47. On or about June 5, 2025, Plaintiff reached out to Jay 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, Jay Hip informed Plaintiff that he is in contact with Megan Fox and That Umbrella Guy and requested she drop them too. Plaintiff stated she would not be dropping the lawsuit, but as long as they would not continue to falsely report about her retirement status, she would drop both Megan Fox and That Umbrella Guy. However, the following week they continued to falsely report about Plaintiff's retirement status. [EXHIBIT A Timeline]
- 48. On or about June 7, 2025, Ania Waterman, in contact with Defendant Hales, 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, clearly intended to make Plaintiff appear as if she was picking on a vulnerable person. [EXHIBIT A – Timeline]

- 49. From or about May 27, 2025, until present, Megan Fox and That Umbrella Guy continued to report that Plaintiff retired to evade disbarment, despite being emailed the Florida Bar's sworn affidavit that evidences this is false. Megan 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 That Umbrella Guy made comments about Plaintiff's mental health, claiming she is off her meds and crazy. [EXHIBIT A – Timeline]
- 50. Plaintiff's reputation online has been completely ruined as a professional. [See EXHIBIT B] 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]
- 51. To date, Plaintiff continues to receive harassing emails and has suffered substantial damages in result of the Defendants actions. [EXHIBIT E]
- 52. Plaintiff incorporates by reference all Notices filed containing exhibits of evidence in support of this 2nd Amended Complaint.

CAUSE OF ACTION:

<u>COUNT I(A): DEFAMATION (LIBEL AND SLANDER)</u> (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.

<u>COUNT I(B): DEFAMATION PER SE</u> (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. 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, Shizzywiznut, 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 transexual" 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 "Transexual" 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.

<u>COUNT III: INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS (IIED)</u> (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 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.

<u>COUNT IV: NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS</u> (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. Defendants Hales, Rizk, Hip, Megan Fox, Umbrella Guy, Shizzywiznut, 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 wellbeing, 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.

<u>COUNT V: CYBERSTALKING / HARASSMENT</u> (Against Defendants Hales, Rizk, Hip, Fox, Umbrella Guy, Shizzywiznut, 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, Shizzywiznut, 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, nonnewsworthy 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.

<u>COUNT VI: CIVIL CONSPIRACY</u> (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.

<u>COUNT VII: TORTIOUS INTERFERENCE WITH BUSINESS RELATIONSHIPS</u> (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. 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, Shizzywiznut, 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.

<u>6/15/25</u> Dated

<u>/s/ Michael Ferderigos</u> 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 9TH 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.

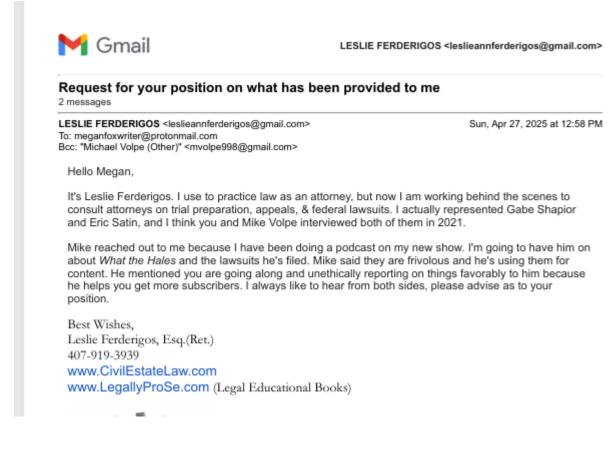
<u>6/13/25</u> Dated <u>/s/ Michael Ferderigos</u> Michael Ferderigos, Esq. Bar No.: 604011 10454 Birch Tree Lane Windermere, FL 34786 Telephone 407-592-0035 mferderigos@gmail.com michael@civilestatelaw.com

TIMELINE

<u>On or about April 26, 2025</u> 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.

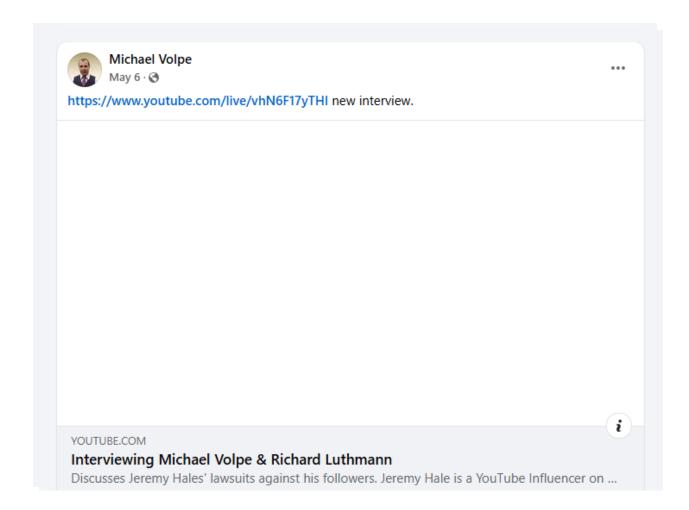
At this time, Leslie Ferderigos, did not have but 7 subscribers, made up of friends, family, & clients that she used to upload and share videos with. At no time, was Leslie attempting to grow her channel with those following the Jeremy Hales lawsuits. Leslie Ferderigos had audio podcasts where she interviewed 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.

<u>On or about April 27, 2025</u>, 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.



<u>On or about April 29, 2025</u> Leslie Ferderigos Entertained an Interview request for Michael Volpe

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



<u>On or about May 13, 2025</u>, 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 · 🚱

Aaawww, 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?



DAD LAWYER WAS FIRED - Federal Court opdate 59K views - Streamed 1 month app What The Hales @ BAD LAWYER WAS FIRED - Federal Court Update Bad Lawyers Everywhere OTTER CREEK, FL PUBLISHED ON: 04.06.2025.

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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.

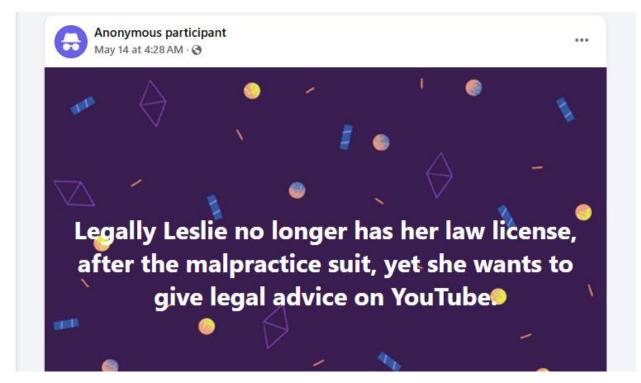
I, Cynthia B. Jackson, being duly sworn, deposes and says:

- 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.
- 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.
- This Affidavit is provided pursuant to Sections 90.803(6) and 90.902(11), Florida Statutes.
- I have reviewed the membership records of The Florida Bar concerning Ms. Ferderigos, and they indicate that:
- Ms. Ferderigos was a member of The Florida Bar, admitted on 04/22/2017, and her membership number was 0127526.
- 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.
- On 11/29/2021 she removed her cost delinquency and returned to active status as a member in good standing.
- 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.

Upthia & Joeles

Rev. 07/21/2023

Page 1 of 2



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.

<u>On or about May 16, 2025,</u> 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 1
Big Little Gal	Hales timeline, Preston strikes - So there was an election in Otter Creek and Terese from the campground beca	May 1
Big Little Gal 2	(no subject) - Watch the last three minutes of this video. https://www.youtube.com/watch?v=S1z42MtCMrQ 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 1
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 Live! SHOCKIN	May 1
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 1
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 1
Big Little Gal	Jeremy losing patience #1 - https://www.youtube.com/watch?v=NVDAf AwwOA	May 1

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.

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

00/19/2020	Givil Cover Sneet	1.00	
05/19/2025	Complaint	10	
05/19/2025	Civil Cover Sheet	3	
05/19/2025	Case Initiated		

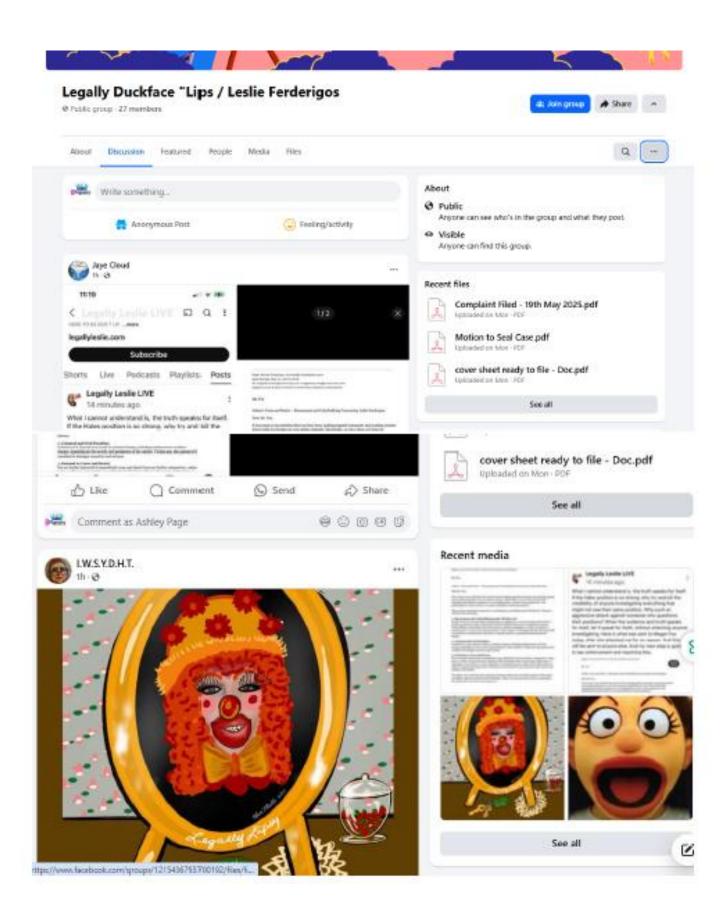
On or about May 26, 2025, Leslie Ferderigos is informed to watch That Umbrella Guys' Live with Megan Fox, where Leslie hear both these people make statements about how she retired her license to evade disbarment, amongst other statements that were harassing and dealt with her personal life.

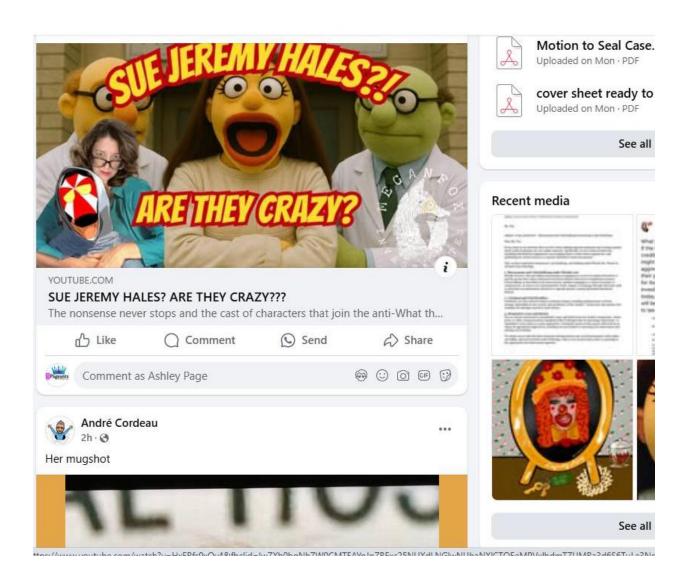
<u>On May 27, 2025</u>, Leslie Ferderigos amends her complaint to add Megan Fox and That Umbrella Guy after witnessing them making statements to imply she retired to evade disbarment

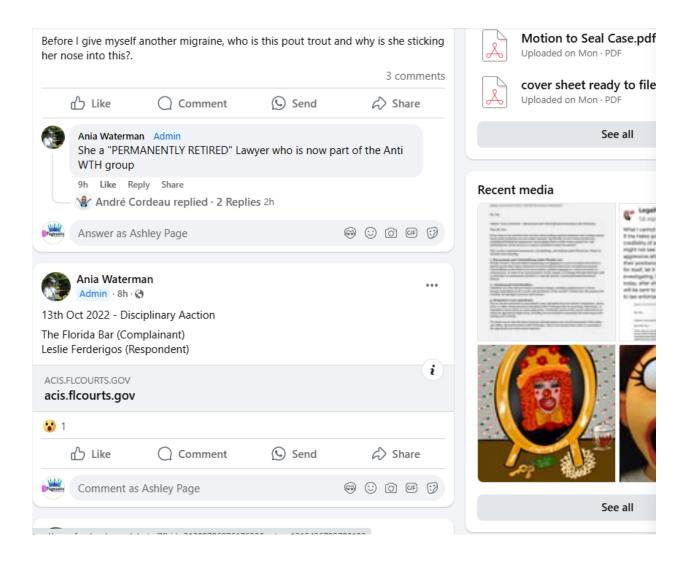
05/27/2025	Amended Complaint Comments: AND DEMAND FOR JURY TRIAL	42	
05/20/2025	Uniform Order Setting Case for Jury/Pretrial - General	11	
05/19/2025	Motion to Seal File Comments: MOTION TO SEAL CASE AND MAINTAIN CONFIDENTIALITY	3	
05/19/2025	Civil Cover Sheet	1	f i
05/19/2025	Complaint	10	
05/19/2025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







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Ania Waterman

JHs claims against defendants by Legally Leslie

4 hours ago (edited)

eases citing Florida Law on the claims Jeremy Hales has alle te these press releases after reviewing more evidence. I am I owledge 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"

wsuits have raised big questions about whether YouTube creaturs, reporters, and can be sued just for talking about a public figure and sharing opinions online. nat 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 he on purpose.

r is famous or has a big online following—like a major YouTuber—they are legally a juse "U.S. Supreme Court law (New York Times Co.v. Suffician, 1964) says public a't win a definitation lawsuit (that's when someone claims you hart their reputation by risk they prove you made a false statement on purpose or recklessly ignored the truthled "actual malice."

t, "I think Jererpy is wrong for how he treats his neighbors," that's an opinion. Even i agrees, that's not defamation.

"Jecency was convicted of a crune," and it's not true and you knew it wasn't true, the what's being said about them efamilies

Vew York Times Co. v. Sollivan, 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 definitation. If you're grung your used on public documents—like court filings or YouTube videos someone posted s—you're protected.

rords 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 You Tabers or Reporters Talk Alcust the Same Story? In Thur.s Not anilow they're planning a crime or fraud together. Handwher is done Jaccultung approving in each other's channels, or disting optimum-set to if you of disagree with the public figure-shows's court in "comparing". These has to be a real agreement to do sameling direct. The scenari fixed or defination, not insite to discuss in sublice passes Example If you creaters both or so the bound links many and one says "I agree with you," that south COLUMN TO . y secondly place to second lies to denney removes 's business, this could be composely-first 10.00 pertializing or reporting is not *Contest Rates - Failing: N7.5a 201771/Fit. 16/DCA 1997); Blat + Gross Rate Kales & Parkersky, CW in 20149 (Ph. 16/DCA 1981)* 4. What Alwait Attenueye Talking to the Media? Totally assessed and legal. and the lattice in comparison in car then they cheer's take represents to high profile cause. That's not concentrate it's part of the legal process. 9. Special Promotions for the Media in Physick Havida law grow the andia rates protect - You must give the mode a chiese to carried in organita intermediations are can use for delicenters. (Flavata lisease 770-07) If Reported to the approximation of the set of the se - Pare option to potentied speech (From 1 Tableaver Demonstration , 1981)

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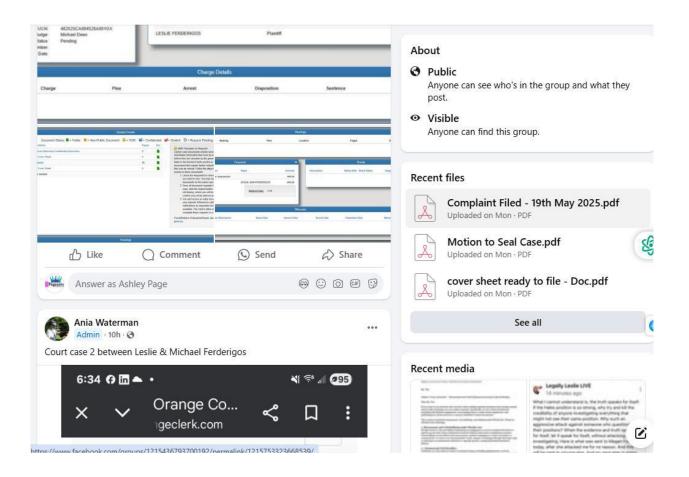
king, collaborating, or even criticizing someone online—even with , and it's not conspiracy.

designed to protect open discussion and reporting, even when pow what is been said about them

mation, see:

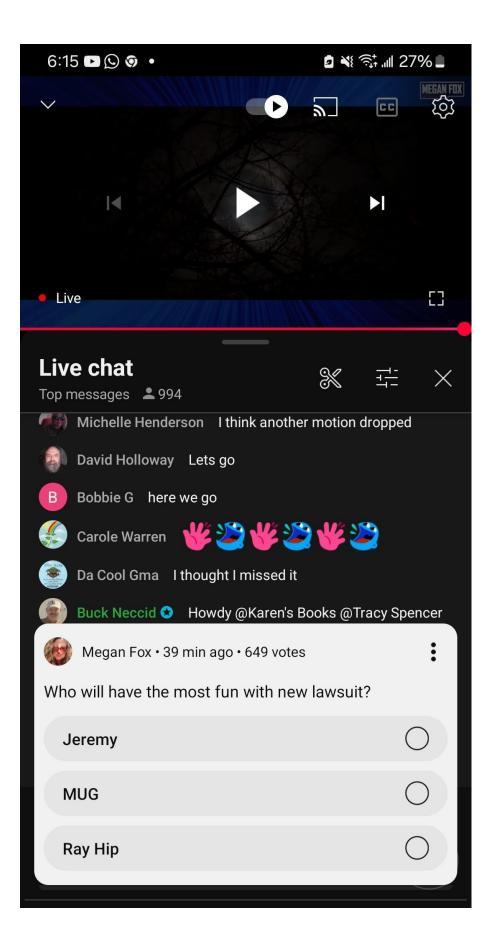
s Co. v. Sullivan, 376 U.S. 254 (1964) Welch, Inc., 418 U.S. 323 (1974) rain Journal Co., 497 U.S. 1 (1990) 'ub. Co. v. Ane, 458 So. 2d 239 (Fla. 1984) ssee Democrat, Inc., 400 So. 2d 52 (Fla. 1st DCA 1981) g. 702 So. 2d 1273 (Fla. 3d DCA 1997)

& State Trial & Appellate Attorney



Print 2025-DR-0 vs. FERI		MICHAEL	US, LESLIE		cover sheet read	
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ESLIE FERDERIGOS	Petitioner	8			181	
MICHAEL FERDERIGOS	Responde	nt				

1 comment



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





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

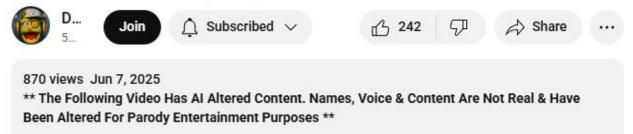
Tracey Norri June 3 at 7:11PM	• 🕲		
ALL THIS TIME.Ashley (born Leslie Boers) and when Leslie was 25 ye	U HIDDEN YOUR OLDEST D/ Boers, also known as Ashley d Darren A. Fano . Leslie and ars old, around 2002. In 2012 ree additional children: WHY	Fano, is the daugh Darren were not m 2, Leslie married att	ter of Leslie Ann Ferderigos arried, and Ashley was born torney Michael Ferderigos,
1 20 7			47 comments 1 share
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Tracey Norri June 3 at 10:13 PM · 🚱						
CLICK ON ASHLEY FANOS POST SOME1						
			28 comments			

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





DjRattis MusicMan June 7 at 6:41 PM · 🕄

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



...

#ottercreek #parody

19	DjRattis MusicMan June 7 at 1:40 AM · 🌚	••
Just m	nade 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 endsThank 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	:
Com	ments = Sort by	
L a a y k n t E	The series of th	first all s. Yo , but got s ke
L aa yy k n t t F F	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 and hate about you. But then on the other hand I feel you are only apologizing because you jumped into this mess head the and wanted publicity and when you didn't get it you started flip flopping. Unfortunately the hate won't stop until you drop your cases and back out. I know you dropped Jay Hip, Megan and TUG but you are forgetting Jeremy and his businesses 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 more as a suggestion. You rolled with the wrong crew. I'm sure you were promised all kind of fame and fortune. Well you he fame, but not the kind you wanted. How about join the group, use your real account and don't hide behind anonymou bosts. If you show the members respect, you too in time will get respect back. However if you keep supporting people lik Bruce Matzkin, Lisa Lee, Richard Luthmann, Michael Yolmit and or any of the others from that group things will just cont hopefully we can see some REAL change from you.	first all s. Yoo ; but i got s ke inue.

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.

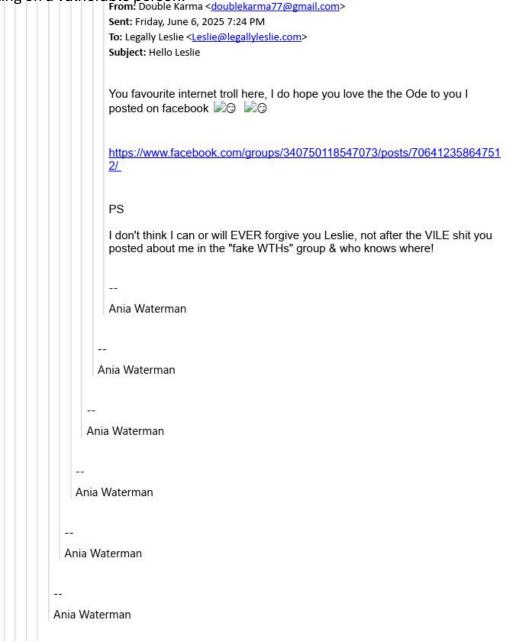
DJ Rattis then creates an insulting song where he publishes it, using Leslie Ferderigos name, while calling her a fail, loser, amongst other insulting language.

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.

<u>On or about June 5, 2025,</u> 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.



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 <<u>Leslie@legallyleslie.com</u>> 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.

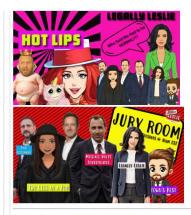
SUSCRIBE "Legally Leslie" aka "Hot Lips" on YouTube

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



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

email or facebook messenger are perfered & easiest for me to ' talk' \dots lol \dots (the pitfails of Autism) \dots there you go, go spil the gossiup to Lisa & take the piss

On Sat, 7 Jun 2025 at 02:48, Legally Leslie <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 an ... the Thoreas of the source of

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!!

From: Double Karma <<u>doublekarma77@gmail.com</u>> Sent: Friday, June 6, 2025 9:45 PM To: Legally Leslie <<u>Leslie@legallyleslie.com</u>> Subject: Re: Hello Leslie

Am happy to do messenger

On Sat, 7 Jun 2025 at 02:40, Legally Leslie <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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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 <<u>doublekarma77@gmail.com</u>> Sent: Saturday, June 7, 2025 9:58 PM To: Legally Leslie <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, <<u>doublekarma77@gmail.com</u>> 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> wrote: Ania,

On Sat, 7 Jun 2025 at 11:05, Double Karma <<u>doublekarma77@gmail.com</u>> 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 > 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"

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> Contact: Leslie@ LegallyLeslie.com www.LegallyLeslie.com

From: Double Karma <<u>doublekarma77@gmail.com</u>> Sent: Saturday, June 7, 2025 5:34 AM To: Legally Leslie <<u>Leslie@legallyleslie.com</u>> 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> wrote:

Ania,

From: Legally Leslie <<u>Leslie@legallyleslie.com</u>> Sent: Friday, June 6, 2025 9:18 PM To: Double Karma <<u>doublekarma77@gmail.com</u>> 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 <<u>doublekarma77@gmail.com</u>> Sent: Friday, June 6, 2025 8:36 PM To: Legally Leslie <<u>Leslie@legallyleslie.com</u>> 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 disbarrment 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 hwe 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 SAer 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 disbarrment & 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"

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> Contact: Leslie@ LegallyLeslie.com www.LegallyLeslie.com



From: Double Karma <<u>doublekarma77@gmail.com</u>> Sent: Saturday, June 7, 2025 6:25 AM To: Legally Leslie <<u>Leslie@legallyleslie.com</u>> Subject: Re: Hello Leslie

You happy now

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

From: Double Karma <<u>doublekarma77@gmail.com</u>> Sent: Friday. June 6, 2025 9:31 PM To: Legalty Leslie <<u>Leslie@legaltyleslie.com</u>> 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 > 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"

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SUSCRIBE "Legally Leslie" aka "Hot Lips" on YouTube

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> Contact: Leslie@ LegallyLeslie.com www.LegallyLeslie.com

From: LESLIE FERDERIGOS <<u>leslieannferderigos@gmail.com</u>> Sent: Friday, June 6, 2025 11:28 PM To: Double Karma <<u>doublekarma77@gmail.com</u>>; Legally Leslie <<u>Leslie@legallyleslie.com</u>> 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.

outlook

Re: Hello Leslie

From Double Karma <doublekarma77@gmail.com> Date Sun 6/8/2025 5:49 PM To Legally Leslie <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

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 <<u>Leslie@legallyleslie.com</u>> 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!!

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

Get Outlook for iOS

From: Double Karma <<u>doublekarma77@gmail.com</u>> Sent: Friday, June 6, 2025 11:24:37 PM To: Legally Leslie <<u>Leslie@legallyleslie.com</u>> 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 sherri' $$\rm https://www.instagram.com/therealslimsherri/$

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 > 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

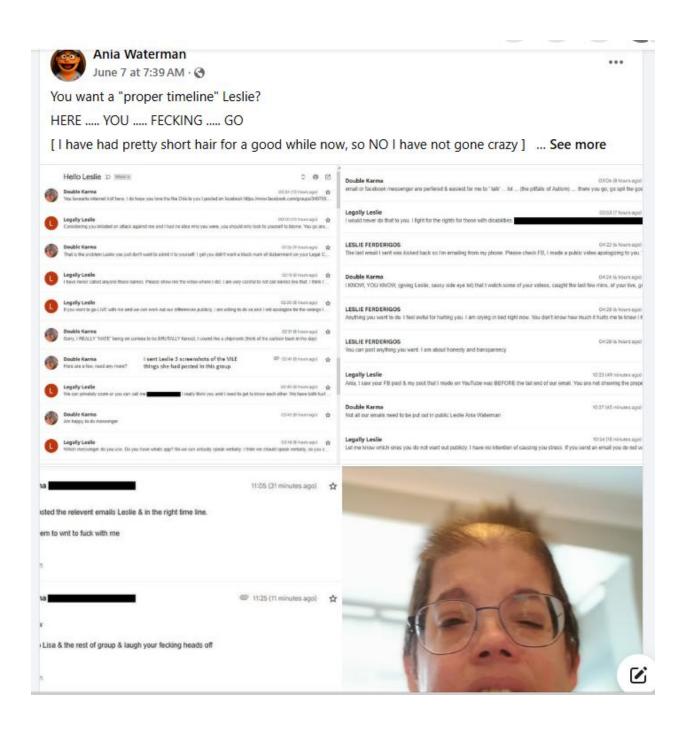
SUSCRIBE "Legally Leslie" aka "Hot Lips" on YouTube

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. 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



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 9TH 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.

<u>6/15/25</u> Dated <u>/s/ Michael Ferderigos</u> 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 or 407-371- ...





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 ...



BAD NEIGHBOR FINALLY TELLS THE TRUTH

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



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

<u>#LegallyLeslie - Search / X</u>

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.

D

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 ...

Ξ

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 ...

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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 ...



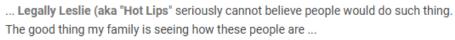
Facebook · OTTER CREEK, FL & THE SHADY'ER BUNCH (UNCENSORED) 10+ comments · 6 days ago



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

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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!"

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a

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/a7r00ro9PA 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 ...



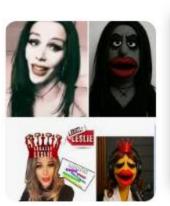
X · Bingobrewtea 2 weeks ago

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 ...







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

Videos :



Exclusive Interview: Leslie Lips Otherwise Known As ...

YouTube · DJ_Rattis 1 week ago



@LegallyLeslie #HotLips

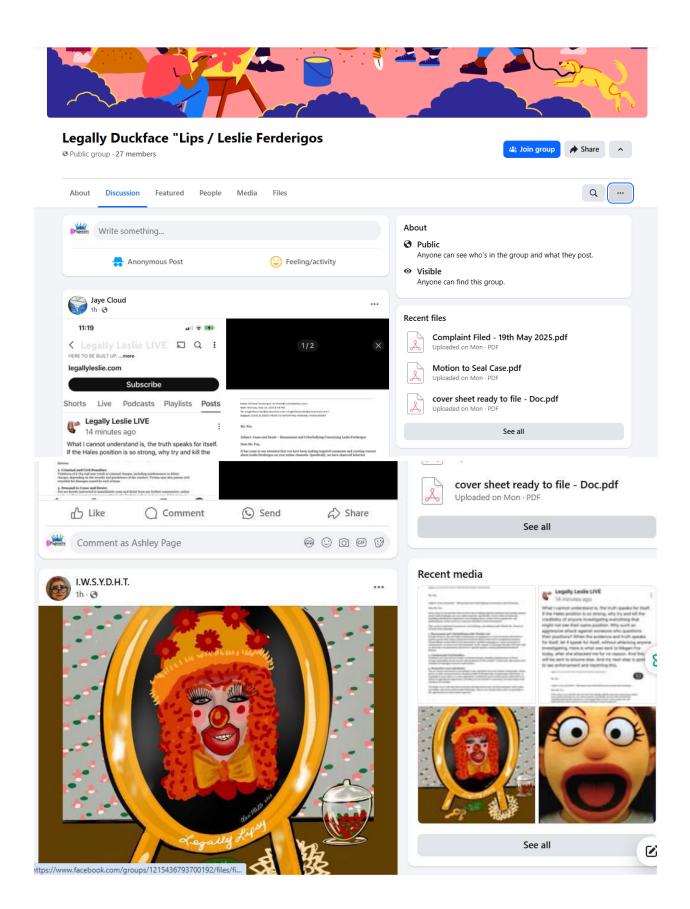
YouTube · Hot Lips 1 week ago

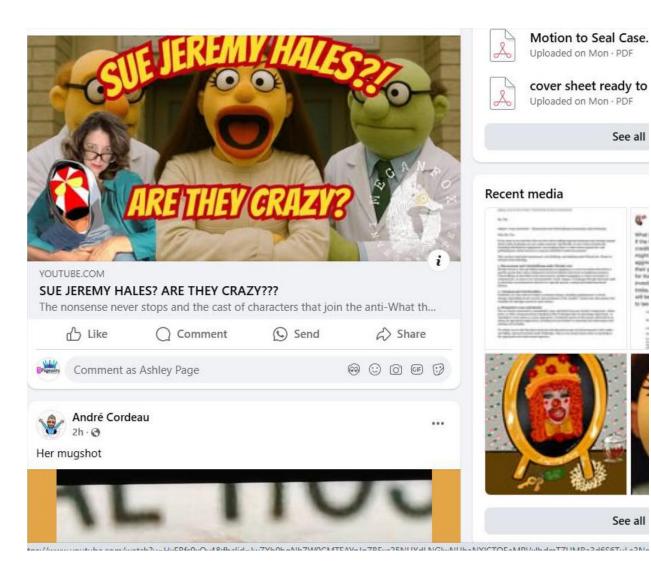


THE LEGALLY LIPS FILES: Behind the Botox, Lawsuits & Lies

YouTube · Shizzywhiznut 3 weeks ago

Feedback

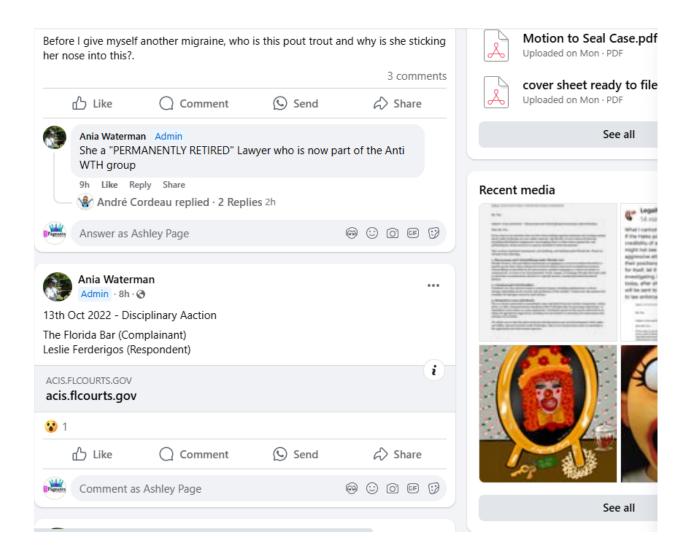


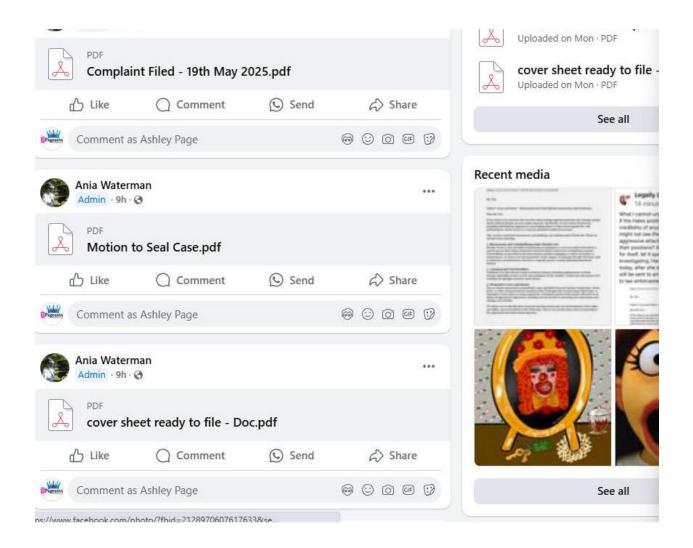


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Contraction of the local division of the loc		e & Michael Ferder	igos		Recent media
Court case	2 between Lesli		M	₹° Ø95	necent media



Ania Waterman Admin · 16h · 🚱

JHs claims against defendants by Legally Leslie

1 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 owledge 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

evuits have raised big questions about whether YouTube creaters, reporters, and can be sued just for talking about a public figure and sharing opinions online, tat 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 he on purpose

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

1, "I finith Jewray is wrong for how he nexts his neighbors," that's an opmion. Even i designed to protect open discussion and reporting, even when pow "Jeremy was connected of a crime," and it's not true and you knew it wasn't true, the what's being said about them or famoustacion

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

bout Opinions Based on Public Records?

stected-upinions 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 defimation. If you're grung your sed on public documents—like enur filings or Yos/Tube videos someone posted s-you're protected.

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

2. What If Two Yao Taken or Reporters Talk Alwart the Yaoo Story" is That a

Not assiste they're allocating a critical or fraud insertior.

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Example: If two cases

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nears, Ramor Parling, 2015a, 241771-074, 1010CA 2007), Hint-en, Rein, Kalandi Paraharishi, 2015a, 24540 (Ph. 5510CA 2017)

4. What Almat Attenues. Tabling in the Nedlet?

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3. Sparial Franciscon for the Media in Physics

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

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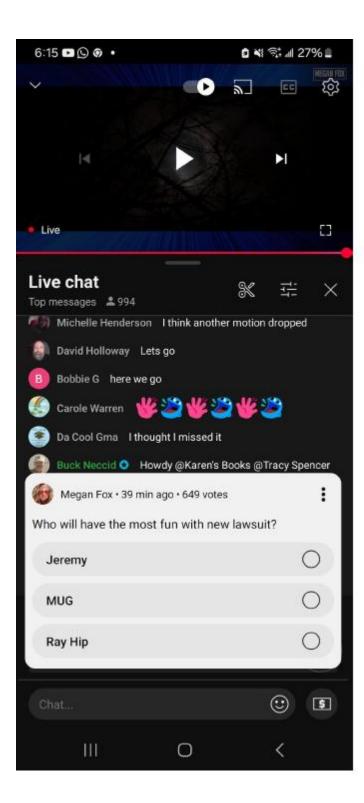
s Co v Sullivan, 376 U.S. 254 (1964) Welch, Inc., 418 U.S. 323 (1974) rain Journal Co., 497 U.S. 1 (1990) 'ub. Co v. Ane, 458 So. 2d 239 (Fla. 1984) ssee Democrat, Inc., 400 So. 2d 52 (Fla. 1st DCA 1981) g. 702 So 2d 1273 (Fla 3d DCA 1997)

& State Trial & Appellate Attorney

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Case Type: Dissoluti Date Filed: 2/27/202 Location: Div 42 UCN: 482025DR002: Judge: Mikiaela Nix-V Status: Pending	5 182A0010X	e with Child	ren	
	Parties			~
	Parties Type	Attorney	Atty Phone	~
Citation Number: Compliance Date: Name LESLIE FERDERIGOS	Туре	Attorney		~



1 comment





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

🗱 What The Holes 👁

EAD NEIGHBORS, BAD LAWYER & BAD COPS - Done: Creek and Court Update OTTER CREEK, FL PUBLISHED ON ...



BAD LAWYER DENIED AGAIN - Court Update Sex views - Streamed 2 days age

100 What The Hales @

BAD LAWNER DENIED JEAN- Court Update Bad Lawyers Diversitiers OTTER CREEK, FL PUBLISHED ON 03.84.2025 . New



BAD LAWYER WAS FIRED - Federal Court Update 5% sews - Stearned 1 month ago Tatti What The Hass @ BAD LAWYER BLS FIRED - Federal Court Update Sac Lawers Electronice OFTER CREEK, FL.PURLISHED ON: 04.86,2055...



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The West The Holes @

IAO LAWYER DULLIED LAWYER - Court Update Bad Lawyork Everywhere OTTER CREEK, FL PUBLISHED ON: 04.28.2825



BAD LAWYER BUSTED - Lying Liars Update 52K views - Streamed 9 days apo

uttar What The Holes 👁

BAD LAWYER ISISTED - Lyng Liais Update Bad Lawyers Everywhere OTTER CREEK, PL PUBLISHED ON 04.27.2025 ...



BAD LAWYERS UPDATE - Upcoming Court in Florida Six views - Streamed 3 weeks age

BAD LAWYERS UPDATE - Upcoming Court in Fiorda Bad Lawyers Everywhere OTTER CREEK, FL PUBLISHED DV: 04.15.2025



LYING LAWYER GETS CAUGHT BY JUDGE 73K views + 3 veets age

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FEDERAL JUDGE IS FURIOUS WITH BAD LAWYER 175 years - 1 control app

In Mar The Holes O

Natzh to the END to see what happensil Jeremy & Beorge are back in ODDer Craw for the Winter Beaser, fighting comption an



LAWSUIT DROPPED - Bad Lawyers

70K wave - Diseased 1 month age

RES What The Halles Ø

LAWBUIT DROFPED - Bail Lawyers Odder Criek and Court Update OTTER CREEK, FL PUBLISHED DN: 0323 2025 ...



THEIR LAWYER HIDING - Court Update 57K riews - Seesned 1 menth app

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THER LAWYER HIGHO- Court Update OTTER CREEK, FL PUBLISHED ON, DEDR.2025 DIJULAMER, "Timifade is the largest ...



HER LAWYER DODGING HIS FEDERAL COURT SUBPOENA

STR What The Halos @

Watch to the END to see what happensy Jeremy & George are back in ODDer Creek for the Winter Season, fighting complete and ...

9 ---



Ultimate What The Hale\$ Binge

What The Hales 🕢 - Playtist - Updated loday

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, Míchael Ferderígos MICHAEL FERDERIGOS, ESQ.



YouTube · What'cha Doing Willis?

12K+ views · 1 month ago

WHAT THE HALES THE CHICKENS ARE GONE WILLIS

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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
 Gingerbread Diss)" – DJ Rattis vs ...

What The Hales

O Public group - 5.6K members





Vhat The Hales

Public group · 5.6K members



Tracey Norris

9 Top contributor · Yesterday at 3:00 AM · 🔇

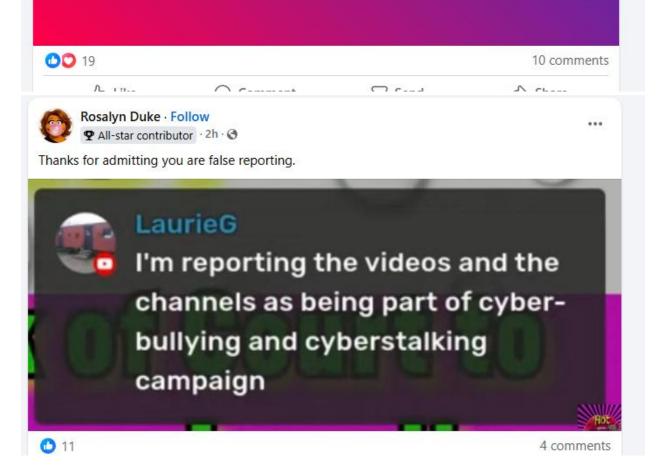
HOW DO YOU WANNA PLAY THIS GAME .SHALL I FINISH IT SO THE REAL ASSHOLES OUT HERE CAN PLAY SATIRE WITH THEM. SEEING IT SEEMS THERES NO LIMIT TO YOUR VENDICTIVE POSTS.POOR YOU THERES SO MANY ANNOS THAT HAVE FUELED THAT LITTLE LIGHT UNDER ME TODAY.

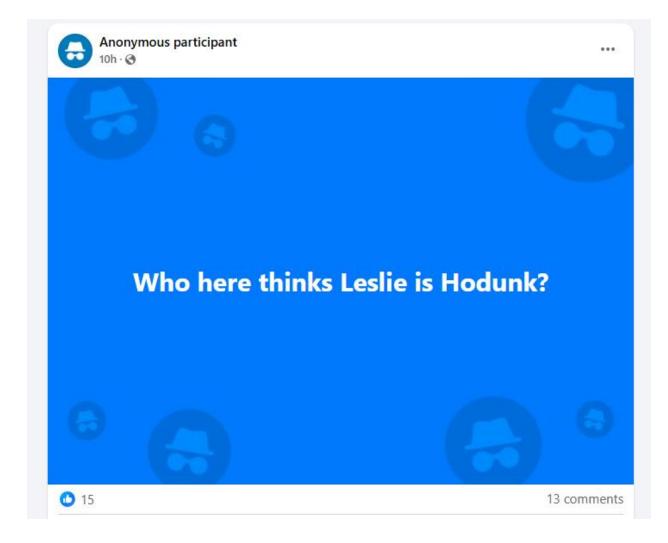




Have you noticed Leslie like a seagull It's all about me me me Motice there's nothing about Crook or Liesnuts it's all about Leslie.

...







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

09	😮 14				20 comments
	🖒 Like	Comment	Sen	d	🖒 Share
View	more comments	3			
9	Jennifer Whalley It's all BS	All-star contributor			
	10h Like Reply	y Share			
9	-	All-star contributor mental episode. every	hour.		
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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 refere number to view the Supreme Court Order and other related documents. Members of the public may obtain information about any disciplinary his				
10 26			39 comments		
🖒 Like	Comment	Send Send	分 Share		





A

Anonymous participant Yesterday at 2:29 AM · ③

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



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

-

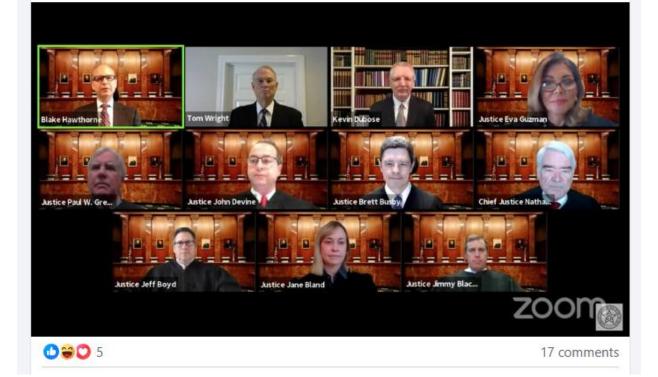


Stu Moran June 12 at 12:09 PM · 🕥

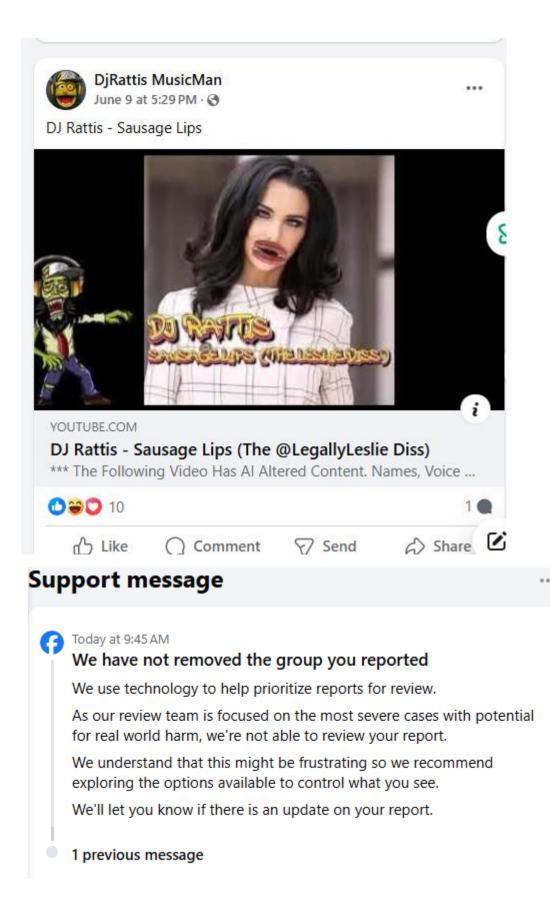
Just got word that the ZOOM hearing didnt go too well for Jerry....

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

Poor Jerry, Poor Hodunks!



...



*****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 9TH 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

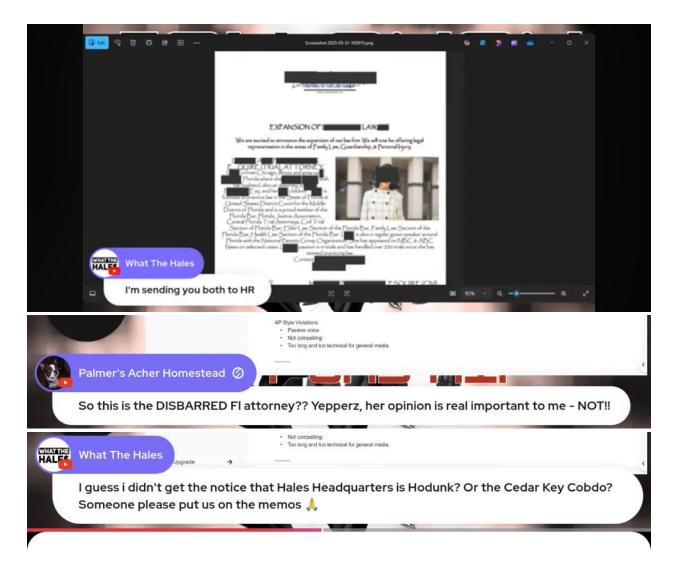
PLEASE TAKE NOTICE of Exhibits in Support of Written Defamatory Statements made by Defendant, Jeremy Hales published during Jay Hipsters LIVE Stream

CERTIFICATE OF SERVICE

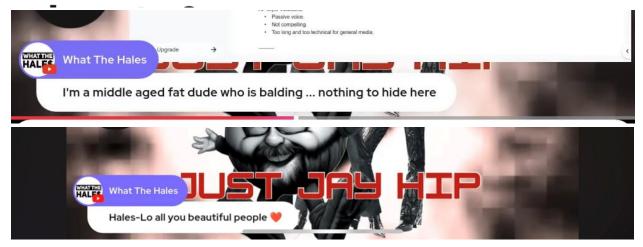
WE DO CERTIFY, that a copy of the foregoing has been furnished electronically with the Clerk of Courts by using the EPORTAL system, all parties of record.

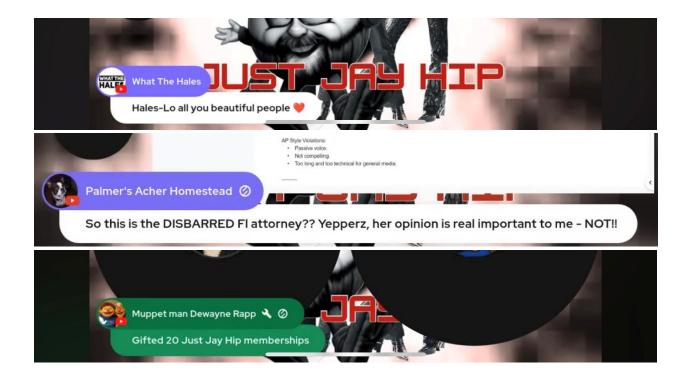
<u>6/14/25</u> Dated <u>/s/ Michael Ferderigos</u> Michael Ferderigos, Esq. Bar No.: 604011 10454 Birch Tree Lane Windermere, FL 34786 Telephone 407-592-0035 mferderigos@gmail.com michael@civilestatelaw.com EXHIBIT A – On or about May 21, 2025, during a LIVE they talk about "Lips", who Jeremy Hales (What the Hales) & his fans call Leslie Ferderigos is their LIVE streams





What the Hale\$ is wrong with this new





IN THE CIRCUIT COURT OF 9TH 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.

<u>6/14/25</u> Dated <u>/s/ Michael Ferderigos</u> Michael Ferderigos, Esq. Bar No.: 604011 10454 Birch Tree Lane Windermere, FL 34786 Telephone 407-592-0035 mferderigos@gmail.com michael@civilestatelaw.com



Removal from Service List - Case Number 482025CA004528A001OX

From noreply@myflcourtaccess.com <noreply@myflcourtaccess.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, FloridaCase #:482025CA004528A0010XCase 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

This information has been electronically mailed to:

Name	Primary Email	Alternate Email 1	Alternate Email 2
LESLIE ANN FERDERIGOS	LESLIE@CIVILESTATELAW		leslie@civilestatelaw.com
	<u>.COM</u>		
Michael Ferderigos	michael@civilestatelaw.co	mferderigos@gmail.com	
	<u>m</u>		
MEGAN FOX	MeganFox.writer@proton		
	mail.com		
JAY HIPSHER	j <u>ustjayhip@gmail.com</u>		
Ninth Judicial Circuit	*****		



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?

From Legally Leslie <Leslie@legallyleslie.com>Date Sun 6/15/2025 12:23 PMTo 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.

<u>www.LegallyLeslie.com</u>

For Real Legal Commentary

SUBSCRIBE on YouTube & Rumble <u>@LegallyLeslieForReal</u> For Satirical Depictions of Real Events SUBSCRIBE on YouTube & Rumble "HOT LIPS" at @HotLinsbyLegallyLes

SUBSCRIBE on YouTube & Rumble "HOT LIPS" at <u>@HotLipsbyLegallyLeslie</u>

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

www.LegallyLeslie.com



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 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.

<u>www.LegallyLeslie.com</u>

For Real Legal Commentary

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> Contact: Leslie@ LegallyLeslie.com www.LegallyLeslie.com



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 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) 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 <u>https://www.stockq.org/moviescript/T/tin-star-the.php</u> The Tin Star 1957 Approved 1h 33m Top cast Henry Fonda Morgan Hickman Anthony Perkins Sheriff Ben Owens <u>https://www.imdb.com/title/tt0051087/?ref = fn all ttl 2</u>

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_mjSlQ4QynWbeotB3bg/community?

<u>Ib=UgkxiE7cltvppUc3rlEJPaTAdEhlNI7IYgc5</u> 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?

<u>cltem=NlbIG46ZkxO3QDRUbTZry9hcTTVNC3vKzyDoUvSgsQy8ODQoUwCplvS9c48l86Uh2Ju0CLWrz6p</u> <u>e0itN2NHPUqBnYOqMImKnv1KXPWJmOOY%3D</u>

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 HIPSHER JAYHIP AKA Defendant JOHN DOE (THE UMBRELLA GUY) AKA Defendant MEGAN FOX Defendant

https://www.law.cornell.edu/rules/frap/rule 29 Rule 29. Brief of an Amicus Curiae