

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA

FREE SPEECH FOUNDATION, INC.)  
d/b/a AMERICA’S FRONTLINE )  
DOCTORS, an Arizona nonprofit )  
corporation, and JOSEPH GILBERT, )

Plaintiffs, )

Case No. )

v. )

SIMONE GOLD, )

Defendant. )

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**VERIFIED COMPLAINT FOR INJUNCTIVE RELIEF AND DAMAGES**

NOW COMES Plaintiffs, Free Speech Foundation, Inc. d/b/a/ America’s Frontline Doctors, Inc. (“ALFDS”) and Joseph Gilbert, by and through the undersigned counsel, to seek an emergency injunctive relief pursuant to Fed. R. Civ. P. 65 and L.R. 6.01, to restrain and enjoin Defendant, Simone Gold.

In addition, Plaintiffs seek temporary and permanent injunctive relief to enjoin, restrain, and otherwise prohibit Defendant from (1) using AFLDS’ foundation funds for personal purposes; (2) interfering with AFLDS’ operations, funds, donor relationships, employee relationships; (3) converting and improperly asserting control over AFLDS bank accounts, money, and other resources; (4) defaming and disparaging Mr. Gilbert and others associated with ALFDS; (5)

fraudulently holding herself out at a representative, employee, officer, and director of AFLDS; and (6) illegally asserting control over AFLDS' electronic and information technology systems.

## INTRODUCTION

1. This is an action that seeks to prevent the rogue founder of AFLDS, Simone Gold, who has not been a director, officer, or employee of AFLDS since early 2022 from gaining access and use of charitable funds for her own personal benefit and from trying to illegally and fraudulently wrest control away from AFLDS' rightful Board of Directors.

2. Specifically, Gold has used AFLDS charitable funds to purchase a \$3.6 million home in Naples, Florida for her personal rent-free use, and at least three vehicles and has otherwise used AFLDS funds to resource her personal lifestyle and expenses since she formed AFLDS. Further, over the last several weeks, despite having no director, officer, or employee role with the organization, Gold has interfered with AFLDS' operations, funds, donor relationships, employee relationships, converted and improperly asserted control over AFLDS information technology, bank accounts, money and resources, defamed and disparaged the Board Chairman Mr. Gilbert and others associated with ALFDS, and fraudulently held herself out at as representative, officer, and director of AFLDS.

3. Gold's conduct has caused and is likely to cause further irreparable harm to Plaintiffs for which there is no adequate remedy at law. Further, Plaintiffs have a substantial likelihood of success on the merits of their claims. And given that AFLDS is a public charity, considerations of the public interest weigh heavily in favor of the Court granting the relief AFLDS is seeking.

### **JURISDICTION AND VENUE**

4. Jurisdiction is based on diversity of citizenship under 28 U.S.C. § 1332 and the damages in this matter exceed the jurisdiction minimum of \$75,000.

5. Venue is proper under 28 U.S.C. §1391(e) because Defendant resides in this district.

### **PARTIES**

6. Plaintiff AFLDS is an Arizona nonprofit organization with its principal place of business in Tucson, Arizona. Plaintiff AFLDS is a citizen of Arizona.

7. Plaintiff Gilbert is a citizen of Nevada.

8. Defendant is a domiciled in, and, upon information and belief, is a citizen of Florida, and is not a citizen of Arizona or Nevada.

### **ALLEGATIONS OF FACT**

9. Simone Gold incorporated ALFDS in June 2020 under the Arizona Nonprofit Corporation Act. AFLDS was organized "exclusively for charitable purposes" specifically "to perform, every act or acts necessary, incidental to or connected with

the furtherance of its charitable, scientific, literary, religious, and educational purposes, with a focus on educating the public on the enduring importance of the Bill of Rights to America’s history and civic traditions.”

10. AFLDS is currently governed and always has been governed by a Board of Directors. From September 2020 through January 2022, Gold was a director and the executive director of AFLDS. In her role as executive director, Gold authorized the hiring of employees, developed and supervised AFLDS’ charitable programs, developed and managed partnerships with other organizations, oversaw fundraising activities, and oversaw communications with program participants, government officials, and the general public.

11. Plaintiff Gilbert is the AFLDS Chairman of the Board, Chief Operating Officer, and Director of Strategy.

#### **Gold’s Misuse of Charitable Funds**

12. On November 14, 2021, Gold signed a contract listing herself as buyer of a residential property in Naples, Florida for the purchase price of \$3,600,000 (the “Naples Home”). Gold purchased this home with AFLDS funds without authorization or approval by the Board of Directors and in violation of Internal Revenue Code §§ 501(c)(3) and 4958.

13. The deed to the Naples Home records Naples Freedom Headquarters LLC as the owner of that property. Gold was originally identified as the “manager” of Naples

Freedom Headquarters; however, on January 14, 2022, Articles of Amendment were filed naming AJ Andrzejewski, an AFLDS employee, as the manager. Gold currently lives in this home with John Strand, rent free.

14. On November 17, 2021, Gold signed a residential lease as a tenant of a separate property in Naples, Florida pursuant to which she was to pay \$45,000 in advance, followed by \$15,000 per month for the duration of the 12-month lease term. That lease term began January 1, 2022. An amendment to the lease agreement substitutes Free Speech Foundation, Inc. for Gold as the tenant of the property. The property is listed as the address of AJ Andrzejewski on a January 20, 2022, corporate report for Naples Freedom Headquarters. Mr. Andrzejewski and his wife lived in this house rent free.

15. At or around this same time, Gold purchased three vehicles including a Mercedes Benz Sprinter van, a Hyundai Genesis, and a GMC Denali, using AFLDS funds for her own personal transportation needs.

16. After Gold took possession of the Naples Home she began using AFLDS funds to pay a personal security officer \$12,000, a personal housekeeper \$5,600 month, and otherwise spending money for personal items on AFLDS credit cards at a rate of nearly \$50,000 per month. Additionally, the Naples Home was used by GoldCare employees.

17. An AFLDS employee named John Strand lived with and continues to live with Gold at the Naples Home and was not only paid \$10,000 a month as an employee, but was given access to AFLDS credit cards at Gold's direction and spent between \$15,000 and \$17,000 a month on those credit cards. Mr. Strand's employment was terminated by AFLDS in the summer of 2022.

18. On at least two occasions, Gold flew on private planes using AFLDS funds without approval or authorization from the Board of Directors. One of those trips exceeded \$100,000.

19. On February 2, 2022, at an AFLDS Board of Directors meeting, Gold resigned from AFLDS' Board so that she could devote time and energy to her vision of opening health and wellness centers nation-wide. The Board unanimously voted to accept Gold's resignation, voted Mr. Gilbert into the Chairman position, Amy Landau as the Executive Director, and the remaining board members as Jurgen Matthesius, and Richard Mack.

20. At the same February 2, 2022 Board meeting, Mr. Gilbert suggested that Gold and ALFDS enter into a consulting agreement so that Gold could continue as the "face" of AFLDS and using her marketing skills to raise money for AFLDS. The Board voted to have Mr. Gilbert negotiate the consulting agreement with Gold.

21. During the negotiations of the consulting agreement, Gold sought from AFLDS a "signing bonus" of \$1.5 million and \$50,000 monthly as a consulting fee.

Under that agreement, GoldCare (discussed below) was also to be granted, at no cost, private work space and accommodations at the Naples Home.

22. Gold created a for-profit enterprise called GoldCare Marketing Services LLC (“GoldCare”) to pursue the creation of health and wellness centers. After doing so, through her influence, Gold began diverting numerous AFLDS employees that are paid by AFLDS to work at GoldCare, allowing AFLDS to pay their salaries despite doing little to no work for AFLDS.

### **Gold’s Tortious Interference and Illegal Attempts to Seize Control**

23. On June 22, 2022, Gold was sentenced to serve 60 days in federal prison after pleading guilty to a misdemeanor charge of unlawfully entering and remaining in a restricted area of the U.S. Capitol on January 6, 2022.

24. While Gold served her prison sentence, Plaintiff Joseph Gilbert, the Board Chairman and Director of Strategy, stepped into day-to-day operations to help AFLDS run smoothly during Gold’s absence. By that time, the Board had become aware of Gold’s uses of AFLDS funds and hired a forensic auditor, obtained a compensation study, and had its outside accounting firm begin a financial audit in order to determine what next steps should be taken with regard to Gold’s use of AFLDS funds for her personal use.

25. Gold was released from prison on September 9, 2022 and continues to be under supervised release. Upon Gold’s release, Mr. Gilbert, as Chairman of the

AFLDS Board, advised Gold of the steps the Board had taken in her absence to look into her use of charitable funds for personal purposes and the steps it would need to take as a result.

26. Although Gold feigned understanding and acceptance of the steps AFLDS would need to take, it became evident shortly thereafter that Gold would do anything but accept what was in the best interests of AFLDS, its donors, employees, and mission.

27. Gold wanted to take back control of AFLDS and restore herself into a leadership role with the organization. Indeed, even though she had no role other than as a consultant, Gold began directing AFLDS employees in different ways in attempts to learn information and seize control.

28. On October 4, 2022, Gold sent an email addressed to “the AFLDS Board of Directors,” identifying Pastor Jurgen Matthesius and Richard Mack, in which she alleged that the third Board Member, Plaintiff Mr. Gilbert, had engaged in wrongdoing in his role with AFLDS. In that email, Gold demanded that the Board take certain steps to essentially remove Mr. Gilbert from the Board and investigate her allegations.

29. The Board responded to Gold’s allegations by retaining counsel to investigate her allegations thoroughly. However, as soon as this investigation began, Gold began threatening the Board, AFLDS’ counsel, and employees that she would interfere

with AFLDS donors, to persuade them not to make donations to AFLDS if her demands were not met. During this time, Gold continued to participate in speaking engagements representing AFLDS in public forums. AFLDS representatives learned that Gold falsely told donors that Mr. Gilbert had engaged in financial improprieties, ethical violations, and corruption.

30. Beginning in October 2022, Gold has interfered with, sought to seize control of, and ultimately taken control of AFLDS in the following manner and by the following actions:

- On October 12, 2022, Gold sent the Executive Director and her personal assistant, Lisa Andrzejewski, to a Board meeting to read a demand letter by Gold that each member of the Board resign immediately. That letter also threatened each Board Member with litigation and exposure “by name and location to the public” if they did not immediately resign from their positions as board members. (Ex. 1 hereto, Gold 10/12/22 Demand Letter)
- In response to requests that Gold refrain from disparaging board members or discussing her allegations or the investigation into those allegations with donors, Gold advised AFLDS’ counsel, among other things, that she would do what she needed to do and that AFLDS donors she had been in touch with are “aware that their monies, which they donated for specific reasons I promised to guard, are at risk.” She also stated that whether she disparaged Mr. Gilbert in public depended upon him resigning from his position on the Board. (Ex. 2 hereto, Gold 10/7/22 Email to Counsel)
- On October 31, 2022, without the authorization of the Board, Gold sent a letter on AFLDS’ letterhead, fraudulently signing her name as the “Chairman and President of AFLDS,” to Mr. Gilbert asserting that he had committed ethical violations and that he was recused from the Board.
- On November 1, 2022, without the authorization of the Board, Gold sent a letter on AFLDS letterhead, fraudulently signing her name as the “Chairman and President of AFLDS,” to AFLDS outside counsel, Wagenmaker &

Oberly, purporting to terminate its representation of AFLDS. (Ex. 3 hereto, Gold 11/1/22 Ltr to W&O)

- On November 1, 2022, without the authorization of the Board, Gold sent a letter to the AFLDS employees which, among other things, accused Mr. Gilbert of “improper financial dealings” and falsely asserted that she was the Chairman and President of AFLDS. (Ex. 4 hereto, Gold 11/1/22 Ltr to AFLDS Staff)
- On November 2, 2022, without the authorization of the Board, Gold entered the Microsoft Teams application used by AFLDS employees and advised the employees falsely, among other things, that she was the “legitimate Chairman of the Board and President” and that Mr. Gilbert had been recused from the Board and no authority to act on behalf of AFLDS. She also advised that employees were not to take any orders other than from her, the President or from the Executive Director Lisa Andrzejewski (whose employment had been terminated by the AFLDS Board).
- On November 2, 2022, without the authorization of the Board, Gold advised AFLDS’ treasurer not to abide by directions from the Board of Directors regarding funds or the entity’s bank accounts and payments.
- On November 2, 2022, without the authorization of the Board, directed AFLDS employees to seize control of AFLDS’ electronic mail, website domain name systems (“DNS”), and other electronic databases, and lock certain employees out of these systems.
- On November 3, 2022, without the authorization of the Board, Gold purportedly on behalf of AFLDS, and identifying herself as the “Chairman and President of AFLDS,” released a press release that reported she had “resumed” her role as Chairman and President of AFLDS and repeated Gold’s allegations against Mr. Gilbert that she announced to the AFLDS employees. (Ex. 5 hereto, 11/3/22 Gold Press Release)
- On November 3, 2022, without the authorization of the Board, Gold sent a letter on AFLDS letterhead, signing her name as the “Chairman and President of AFLDS,” to AFLDS’ in-house counsel advising her that she was suspended without pay for violating Gold’s order that AFLDS employees disregard requests from the Board. (Ex. 6 hereto, 11/3/22 Gold Ltr. to Bradford)

31.As a result of Gold's actions, individual employees have no access to their email accounts and are unable to perform their job functions as AFLDS employees; the rightful Board of Directors has no control over AFLDS' finances, IT and other electronic systems, intellectual property, public representations, or employees. Gold has wrongfully and illegally seized control and taken over AFLDS' resources and people. None of her actions have been approved by the Board of Directors and she has no legal right to act as she has acted.

**COUNT I**  
**Fraud**  
**Asserted by Plaintiff AFLDS**

32.Plaintiffs reallege and incorporate by reference all of the allegations in paragraphs 1 through 31 of this complaint.

33.Defendant has made false statements of material fact that she knows to be false as described above.

34.Defendant made the false statements of material fact described above with the intent to induce others to rely on those statements.

35.As a result of and in reliance on Defendants false statements of material fact, Plaintiffs have been damaged in an amount to be proven at trial, but in excess of \$75,000.

**COUNT II**  
**CONVERSION**  
**Asserted by Plaintiff AFLDS**

36.Plaintiffs reallege and incorporate by reference all of the allegations in paragraphs 1 through 31 of this complaint.

37.Defendant has wrongfully asserted dominion over AFLDS' bank accounts, IT systems and domain names, employees, money, and other resources.

38.Defendant's actions are inconsistent with her lack of ownership over such AFLDS' property and resources.

39.As a direct and proximate cause of Defendant's actions, Plaintiff AFLDS has been damaged in an amount to be proven at trial, but in excess of \$75,000.

**COUNT III**  
**TORTIOUS INTERFERENCE WITH EMPLOYMENT RELATIONSHIPS**  
**Asserted by Plaintiff AFLDS**

40.Plaintiffs reallege and incorporate by reference all of the allegations in paragraphs 1 through 31 of this complaint.

41.A business relationship, in the form of an employment relationship, existed between Plaintiff AFLDS and employees.

42.Defendant is and has at all times been aware of AFLDS' relationships with its employees.

43.By her actions described above, Defendant has intentionally and without justification interfered with Plaintiff AFLDS' relationships with its employees and

caused employees to refuse to perform their jobs pursuant to their job duties and responsibilities.

44. As a direct and proximate cause of Defendant's tortious interference, Plaintiff AFLDS has suffered damages in an amount to be proven at trial, but in excess of \$75,000.

**COUNT IV**  
**TORTIOUS INTERFERENCE WITH BUSINESS RELATIONSHIPS**  
**Asserted by Plaintiff AFLDS**

45. Plaintiffs reallege and incorporate by reference all of the allegations in paragraphs 1 through 31 of this complaint.

46. A business relationship existed between Plaintiff AFLDS and its lawyers, its donors, its banks and a relationship existed between Plaintiff AFLDS and the Internal Revenue Service by virtue of AFLDS' status as a charitable organization under Internal Revenue Code Section 501(c)(3).

47. Defendant is and has at all times been aware of AFLDS' relationships with the entities referenced above.

48. By her actions described above, Defendant has intentionally and without justification interfered with Plaintiff AFLDS' relationships with its lawyers, donors, and banks, as well as its relationship with the IRS as a 501(c)(3) organization.

49. As a direct and proximate cause of Defendant's tortious interference, Plaintiff AFLDS has suffered reputational and other harm in an amount to be proven at trial, but in excess of \$75,000.

**COUNT V**  
**TORTIOUS INTERFERENCE WITH PROSPECTIVE BUSINESS**  
**RELATIONSHIPS**  
**Asserted by Plaintiff AFLDS**

50. Plaintiffs reallege and incorporate by reference all of the allegations in paragraphs 1 through 31 of this complaint.

51. Prospective business relationships existed between Plaintiff AFLDS and its donors and prospective donors.

52. Defendant is and has at all times been aware of AFLDS' relationships with the donors and prospective donors referenced above.

53. By her actions described above, Defendant has intentionally and without justification interfered with Plaintiff AFLDS' relationships with its donors and prospective donors.

54. As a direct and proximate cause of Defendant's tortious interference, Plaintiff AFLDS has suffered reputational and other harm in an amount to be proven at trial, but in excess of \$75,000.

**COUNTI VI**  
**BREACH OF FIDUCIARY DUTY: WASTE OF CHARITABLE ASSETS**  
**Asserted by Plaintiff AFLDS**

55.Plaintiffs reallege and incorporate by reference all of the allegations in paragraphs 1 through 31 of this complaint.

56.During Defendant's time as a director and officer of AFLDS, Defendant owed AFLDS fiduciary duties of care, loyalty, and obedience.

57.As described above, Defendant, in breach of those duties, used and caused AFLDS assets to be used for her own personal use and not for AFLDS' charitable purposes.

58.Defendant's actions wasted AFLDS charitable assets in contravention of public policy and the Arizona Nonprofit Corporation Act.

59.As a direct and proximate cause of Defendant's actions, Plaintiff AFLDS has suffered damages in an amount to be proven at trial, but in excess of \$75,000.

**COUNT VII**  
**BREACH OF FIDUCIARY DUTY - SELF-DEALING**  
**Asserted by Plaintiff AFLDS**

60.Plaintiffs reallege and incorporate by reference all of the allegations in paragraphs 1 through 31 of this complaint.

61.During Defendant's time as a director and officer of AFLDS, Defendant owed AFLDS fiduciary duties of care, loyalty, and obedience.

62.As described above, Defendant, in breach of those duties, used and caused AFLDS assets to be used for her own personal use and used AFLDS funds without authorization of the independent directors. Further, Defendant voted on her own compensation and failed to recuse herself from this conflict of interest.

63.Defendant's actions constitute self-dealing in violation of her fiduciary duties and were in contravention of public policy and the Arizona Nonprofit Corporation Act.

64.As a direct and proximate cause of Defendant's actions, Plaintiff AFLDS has suffered damages in an amount to be proven at trial, but in excess of \$75,000.

**COUNT VIII**  
**DEFAMATION**  
**Asserted by Plaintiff Joseph Gilbert**

65.Plaintiffs reallege and incorporate by reference all of the allegations in paragraphs 1 through 31 of this complaint.

66.Defendant published false statements about Mr. Gilbert to third parties including AFLDS employees in her written letters to the employees described above and to the public in the press release described above.

67.Defendant acted negligently as to the falsity of statements made to the AFLDS employees and the public.

68.As a direct and proximate cause of Defendant's false statements, Mr. Gilbert has suffered damages to his reputation in an amount in excess of \$75,000.

## **REQUEST FOR IMMEDIATE INJUNCTIVE RELIEF**

69. Plaintiffs reallege and incorporate by reference all of the allegations in paragraphs 1 through 31 of this complaint.

70. As set forth above, Plaintiffs are likely to succeed on the merits of their claims in light of Gold's improper and illegal actions.

71. Plaintiffs have suffered and will continue to suffer irreparable damage as a result of Gold's ongoing illegal conduct of interfering with AFLDS' operations, employees, and resources, and defaming and disparaging Mr. Gilbert.

72. Injunctive relief will cause Gold no damage and it would serve the public interest given that AFLDS is a public charity.

WHEREFORE, based on the foregoing, Plaintiffs respectfully request the following relief:

That the Court issue an injunction ordering Gold to (1) return control of AFLDS resources over which she has seized control to the Board of Directors; and (2) prohibiting Gold from (a) using AFLDS' foundation funds for personal purposes; (b) interfering with AFLDS' operations, funds, donor relationships, employee relationships; (c) converting and improperly asserting control over AFLDS bank accounts, money, and other resources; (d) defaming and disparaging Mr. Gilbert and others associated with ALFDS; (e) fraudulently holding herself out at a representative, employee, officer, and director of AFLDS; and (f) accessing or

asserting control over AFLDS' electronic and information technology systems. For all such other immediate injunctive relief as the Court deems just and fit.

**REQUEST FOR FURTHER RELIEF**

WHEREFORE, Plaintiffs pray that this Court:

- A. Enter judgment in favor of Plaintiffs and against the Defendant;
- B. Declare that the actions of the Defendant constituted fraud, conversion, tortious interference, breaches of fiduciary duty, and defamation.
- C. Award Plaintiffs compensatory damages in an amount to be proven at trial, but in excess of \$75,000.
- D. Award Plaintiffs punitive damages in such amount as the Court deems proper;
- E. Award Plaintiffs their costs, attorneys' fees, and non-taxable expenses in this action; and
- F. Grant Plaintiffs such other and further relief as the Court deems equitable and just.

**JURY DEMAND**

Plaintiffs hereby demand trial by jury pursuant to Federal Rule of Civil Procedure 38(b) on all issues so triable.

*/s/ Joshua D. Lerner*

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*Attorneys for Plaintiff*

### **VERIFICATION**

I, Joseph Gilbert, hereby declare as follows:

I am a plaintiff in this action, and I am Chairman of the Board of Directors, Chief Operating Officer, and Director of Strategy of Plaintiff Free Speech Foundation, Inc. d/b/a America's Frontline Doctors, Inc. I have read the foregoing verified complaint for injunctive relief and damages. Based upon my personal knowledge and upon documents maintained by Free Speech Foundation, Inc. d/b/a America's Frontline Doctors, Inc. in the regular course of its

operations, as well as upon discussions with and reliance upon counsel, the complaint is true and correct to the best of my knowledge, information, and belief.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this \_\_\_\_\_ 11/04/2022

A handwritten signature in black ink that reads "J. Gilbert". The signature is written in a cursive style with a large initial "J" and "G".

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Joseph Gilbert

Begin forwarded message:

**From:** Simone Gold <[drsimonegold@gmail.com](mailto:drsimonegold@gmail.com)>  
**Subject:** Letter  
**Date:** October 12, 2022 at 2:22:40 PM EDT  
**To:** Lisa Andrzejewski <[lisa.andrzejewski@gmail.com](mailto:lisa.andrzejewski@gmail.com)>

To the AFLDS Board,

The nonprofit I founded and led to incredible success by all benchmarks - growth, influence, size, innovativeness, financial - is now at an existential crisis. That is in total contrast to when it was under my leadership and in great shape. As the current Board is totally dysfunctional, you must resign. The organization thanks you for their service.

The Board is already in receipt of a letter from a \$500k donor. The Founder is also in receipt of a letter from another huge donor - who does not want to publicly state his/her name. And I have always had regular communications with all my large donors - and I have confirmed each one, without exception, stands with me. If the Board had bothered to do even the most minimal due diligence, it would have discovered from the AFLDS fundraiser that the organization cannot survive without my fundraising. Equally or more important than the large donors are the tens of thousands of small donors and millions of followers - they all leave with me. The Board did not even do this most minimal inquiry - incredibly shameful dereliction of duty

The Board made many critical mistakes, and when these conflict of interests were exposed by me, the Board ceded decision making to attorney Sally Wagonmaker. (She has a hard conflict of interest and will not be paid for this, details below.\*) The organization is flailing because you, a voluntary Board, legally obligated to serve the nonprofit in the public's interest, have now attempted instead to spend tens of thousands of dollars and flail.

This stops now.

To the current Board. I work incredibly hard to raise money and I respect every donor and I do not waste their money. You will not disrespect the hard-working donor who spends an average of \$29/month to support AFLDS by allowing attorney Sally to rack up tens of thousands of dollars and continuing to allow the organization to flounder is not in the organization's interest.

There is no unsolvable problem here. As the Board is at odds with the entire

organization, and as the organization is unified against the Board, please resign immediately. I want to restate that my offer of a mutual release of liability for each individual Board member is still on the table.

While you each may have different motivations for hanging on where you are not wanted, do not forget that you are going to be held **individually** liable in Court for your decision to resign or not resign. Each of you has your own legal individual fiduciary obligation to the nonprofit organization to do what is in the best interest of the organization. Obviously murdering the organization is not in the organization's interest.

The organization ceases to survive with you as it ceases to have funding or followers with you on the Board. This means that if you do not resign, your actions will prove you are not putting your fiduciary obligation towards the organization first. Your vote will be discoverable by the future Court. This is an easy one for a Judge. Did the Board members vote to allow the organization to live or die? If you resign you demonstrate compliance with your fiduciary obligation to the organization. There also will be no legal action because the organization will be doing great. If you fail to resign you will be liable as failing to comply with your individual fiduciary obligation. And there will be a legal action because the organization will be dead or at death's door - and the Mother Lioness will have her day in Court. Each of the three of you - how you vote - is an action that is discoverable by the Courts.

I am accusing you, **Board Member Jurgen**, with abundant evidence, of violating your fiduciary obligation if you do not resign. As the organization cannot survive with no money, no followers, no workers and no ideas; as there is abundant proof that the entire organization and all the money is against this Board: I am accusing you of murdering the organization if you do not resign. Murdering the organization is incompatible with your fiduciary obligation to the organization. Just as the mother lioness will not let her baby lion be murdered, neither will I.

I am accusing you, **Board Member Mack**, with abundant evidence, of violating your fiduciary obligation if you do not resign. As the organization cannot survive with no money, no followers, no workers and no ideas; as there is abundant proof that the entire organization and all the money is against this Board: I am accusing you of murdering the organization if you do not resign. Murdering the organization is incompatible with your fiduciary obligation to the organization. Just as the mother lioness will not let her baby lion be murdered, neither will I.

I am accusing you, **Board Member Gilbert**, with abundant evidence, of violating your fiduciary obligation if you do not resign. As the organization cannot survive

with no money, no followers, no workers and no ideas; as there is abundant proof that the entire organization and all the money is against the Board: I am accusing you of murdering the organization if you do not resign. Murdering the organization is incompatible with your fiduciary obligation to the organization. Just as the mother lioness will not let her baby lion be murdered, neither will I.

Each Board member is entirely fungible. I ask you to do the right thing by the organization. Step away as you have become the problem. All activities can continue with a new Board.

To assist you in coming to the correct decision, I happily remind you again, that on this date, October 12, I continue to offer each of you a mutual reciprocity of release. This offer expires at the conclusion of this Board meeting **AT NO RISK TO YOU AS AN INDIVIDUAL.**

**Sherriff Mack:** I do not think you have intentionally done anything to harm me or AFLDS. But should you not resign, you will become my enemy in this matter. I ask you to stand with me now and do what I judge is best for AFLDS and my relationship with you personally. I ask you to resign and let us see what the future holds for us together. Your life's work is ethical and honorable law enforcement and the Constitution. I want to work with you on those issues in the future. Should this Board not resign, we will end up in litigation, and your extraordinarily large financial request of AFLDS to financially benefit your own organization will be made public. I ask you to resign. Thank you.

**Pastor Jurgen:** Your actions have been shocking. You cannot both call me an Esther publicly to millions and then fail to heed what Esther needs. I hope it is possible to repair our relationship. I would need more information from you because your actions have been so shocking. But for now, I ask you to stand with me, a person you call Esther, and do what I judge is best for AFLDS and my relationship with you personally. Your life's work is bringing people to Gd. AFLDS is not necessary for your work. I ask you to please stop interfering with my ability to do my life's work which is to heal. I ask you to resign. Thank you.

**Attorney Gilbert:** Your actions have been disastrous. I do not think our relationship can be repaired based upon unethical and devious actions. But never say never as I bear you no personal ill will. You violated the Tenth Commandment ... which led to all your other violations. If you fail to resign - which you already offered to General Counsel and offered to the Board - you will once again show everyone your words are worthless, political silver tongue only, and at that decision-point, you will have decided to turn me into a mortal enemy. Your life's work is politics - you are a

politician-in-waiting. It would be unwise to take a popular folk-hero such as myself and turn her into your mortal enemy. I ask you to resign. Thank you.

### The Way Forward:

The Vote to Resign:

Yea: (the easy way)

- Normal AFLDS work will resume.
- All audits will continue.
- Tens of thousands of dollars will be saved.
- Morale throughout AFLDS will be restored to normal optimism.
- Millions of Americans will continue to have their designated doctor-warrior continue to fight for them

Nay: (the hard way) = corruption

- AFLDS work will flounder
- All audits will continue.
- Tens of thousands of dollars will not be paid to Sally's firm\*
- Energy throughout AFLDS will skyrocket as AFLDS employs freedom fighters who thrive on exposing corruption.

**Jurgen, Mack, Joey:** if any amongst you actually care about the organization you will step down as you have become the obstacle. You are harming the organization. And now heed these further words. I am giving you advance notice that you will also harm yourself if you continue down this path. There is nothing you can do to stop me. I will take several actions; I don't need any permission from you; nor can you stop me.

As you three well know, I have all the people with me and they will happily hate those who hurt me. I will of course go to all my social media, which I personally own, and I will do exactly the same thing Tucker Carlson did in exposing the corrupted Board Members of Vanderbilt University Hospital. I will expose your actions. I am a mother lioness guarding her cub. Nothing else matters.

**• I WILL EXPOSE EACH ONE OF YOU BY NAME AND LOCATION TO THE PUBLIC, EXACTLY LIKE TUCKER CARLSON EXPOSED THE VANDERBILT UNIVERSITY HOSPITAL BOARD OF DIRECTORS. JUST LIKE VANDERBILT REVERSED COURSE, SO TOO WILL YOU RESIGN AFTER I EXPOSE YOU PUBLICLY.**

I will publicly identified you as follows, using the following URLs and pictures:

<https://awakenchurch.com>

Jurgen - sadly it will be absurdly easy for the public to believe the Church has been corrupted. It is obviously your moral obligation to not allow the good work you do in Gd's name to be overshadowed by allowing the public to connect you to corrupt actions. That would be a sin. And for literally nothing? That would be a grave sin b/c you cannot let your good deeds be overshadowed by nonsense - immoral. Please don't force me down this path. As heartbreaking as it is, I will not have a moment's hesitation as I am a mother lioness who will not let AFLDS die. Like Moses, like Esther: Let My People Go.



<https://www.joeygilbert.com/> <https://joeygilbertlaw.com>  
<https://joeygilbertlaw.com>

Joey - you will be the Republic politician face of corruption. This one is too easy. You know all the phone calls your office gets about me? Multiple that by ten and make it hate, not love.



<https://cspoa.org>

Richard - you will become the public face of a person who tried to siphon the people's money away from their desired purpose. Your enemies will have a field day with this - and as I stand with you in defense of the Constitution, this is heartbreaking for me - but I will not have a moment's hesitation as I am a mother lioness who will not let AFLDS die.



\* I will litigate this issue. While it is being litigated, no payments will be made. Sally

cannot be the choice to guide the nonprofit as she was selected at the recommendation of the attorney who persuaded the Founder to step down - a choice I accepted as a selfless act to protect AFLDS. The Founder followed this advice because as the mother lioness, I cared deeply about AFLDS. But that advice was horrific malpractice, and led us here, including to an attorney who is prolonging the dysfunction. Under no circumstances will Sally be paid while this sub-issue of her selection is litigated.

Gdspeed - do the right thing. For the people, for the organization, for yourself.

[REDACTED]

**From:** Simone Gold, MD, JD <drgold@afls.org>

**Date:** Tuesday, October 11, 2022 at 2:04 AM

**To:** Kellye Fabian Story <kellye@wagenmakerlaw.com>

**Cc:** Paul Z Winters <paul@wagenmakerlaw.com>, Sally R Wagenmaker <sally@wagenmakerlaw.com>

**Subject:** Re: Your Allegations Against Joey Gilbert/AFLDS; Next Steps

Hello Kellye,

Once Sally made the decision to investigate the veracity of my words, instead of investigating how the organization survives this, there are many people with whom you should consult. The reason to talk with me is to understand what you have gotten yourself into - and that is important - but I would ask that you please start with others as my work with AFLDS keeps me extraordinarily busy this week.

As I keep emphasizing, and as will become clearer to you each day, the organization is flailing because: first the Board acted improperly, then the Board acted worse, and then Sally failed to stop the flailing. I am a broken record but I'll say it again. You must remove Joey Gilbert from the Board and pause any illegitimate pretense of Joey in a COO position. It is a complete mystery why Sally has failed to take this most basic step. This is harming the organization.

I have enormous obligations to AFLDS this week (every week really.) On Wednesday AFLDS will be starting an adversarial process vs. the MBC (Medical Board of California) after almost nine months of preparation. On Friday I give the keynote speech to a highly influential donor audience. I speak before another large audience on Saturday. As I don't "dial it in" but I write new speeches, I cannot do anything else this week.

I will continue to serve very effectively for AFLDS until or unless I choose not to. At the moment I do not have time to deal with the drama that came from Joey's poor ethics, multiplied by the Board illegitimately naming him COO, and multiplied exponentially by your firm's failure to halt the damage.

No matter the reason, I have critical work to do this week and any other priority will have to wait.

In the meanwhile, millions of Americans would appreciate if you stop the hijacking of the fine organization that I built. The organization was in excellent shape until the Board illegitimately named Joey COO, the Board refused to pause that when given evidence of the harm, and Sally permitted the hijacking to continue. The latter is the worst of the three harms, by far. I have a sterling reputation which was ignored by Sally - to everyone's detriment. It's really such a shame.

Simone Gold, MD, JD

Founder

**America's Frontline Doctors**

The Trusted Name for Independent Information

@DrSimoneGold

[DrGold@AFLDS.org](mailto:DrGold@AFLDS.org)

[AmericasFrontlineDoctors.org](http://AmericasFrontlineDoctors.org)

On Oct 10, 2022, at 12:30 PM, Kellye Fabian Story <[kellye@wagenmakerlaw.com](mailto:kellye@wagenmakerlaw.com)> wrote:

Dear Simone,

I am following up on Sally's emails below and would like to set up a couple times for us to talk. There is a great deal of information (emails and other documents) that I need to get through so I'd like to take two steps:

- 1) set up an initial 30-minute video call for us this Wednesday if that works for you in order for me to get an understanding of the most pressing issues from your perspective; and
- 2) set up a longer video call (probably 2 hours or so) next week to dive deeper into specifics.

Could you please let me know what time Wednesday might work for you? I'm available any time between 11:30 a.m. and 4 p.m. central time.

Sincerely,  
Kellye

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**KELLYE FABIAN STORY** | Attorney at Law  
[Wagenmaker & Oberly, LLC](http://Wagenmaker & Oberly, LLC) | *Trusted Advisors to Nonprofits*  
312-626-1600

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**From:** Sally R Wagenmaker <[sally@wagenmakerlaw.com](mailto:sally@wagenmakerlaw.com)>  
**Date:** Friday, October 7, 2022 at 6:24 PM  
**To:** Simone Gold, MD, JD <[drgold@afls.org](mailto:drgold@afls.org)>  
**Cc:** Paul Z Winters <[paul@wagenmakerlaw.com](mailto:paul@wagenmakerlaw.com)>, Kellye Fabian Story <[kellye@wagenmakerlaw.com](mailto:kellye@wagenmakerlaw.com)>  
**Subject:** Re: Your Allegations Against Joey Gilbert/AFLDS; Next Steps

Simone,

Thanks for your two recent emails. I will review your detailed email below in due course,

and Kellye or I will follow up with you early next week to schedule a time to speak together. In the meantime, please note that my recommendations below are not conditioned on any terms for compliance as you have indicated below. You have raised very significant and extensive allegations, as substantially added to below, and such matters take time to address properly and in light of related legal considerations. I hope you will understand.

Kindly,  
Sally

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**SALLY WAGENMAKER** | [Attorney at Law](#) | 312-626-1600  
[Wagenmaker & Oberly, LLC](#) | *Trusted Advisors to Nonprofits*

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**From:** Simone Gold, MD, JD <[drgold@afllds.org](mailto:drgold@afllds.org)>  
**Date:** Friday, October 7, 2022 at 12:55 AM  
**To:** Sally R Wagenmaker <[sally@wagenmakerlaw.com](mailto:sally@wagenmakerlaw.com)>  
**Cc:** Paul Z Winters <[paul@wagenmakerlaw.com](mailto:paul@wagenmakerlaw.com)>, Kellye Fabian Story <[kellye@wagenmakerlaw.com](mailto:kellye@wagenmakerlaw.com)>  
**Subject:** Re: Your Allegations Against Joey Gilbert/AFLDS; Next Steps

Ty Sally. Your email raised three issues.

First, you should know that I have always been personally in touch with my large donors regularly, including since my release from prison. That is ongoing and will continue as the trust the donors place in me is the reason AFLDS exists. Each large donor has an ongoing verbal contract with me from when I was Chairman of the Board, that they and I would *always* be exactly aligned as to how their money would be spent. I also highly value my small donors and communicate with them regularly through twitter and other social media. The tens of thousands of small donors also relied upon all the public evidence of my leadership of AFLDS. Several of the large donors are concerned about their funds. I would be surprised if you don't start hearing from them. They are all aware that their monies, which they donated for specific reasons I promised to guard, are at risk. I know for certain that there is no large donor that donated for any reason *other* than me. It's highly personal to them. In addition, as part of my ongoing fundraising work for AFLDS, I communicate periodically with several important prospects, people who intend large gifts. And the same is true for the small donors, who send me letters by the thousands. The letters are personal to me. Not AFLDS. Me. As part of your due diligence you

should contact the donors so you are crystal clear on this fact that it's not an abstract nonprofit donation, the money and devotion are very specifically directed to me. I have a fiduciary obligation to donors - as does the Board.

**Second is your query about public commentary from me or Joey about each other.** If you knew me the way I wish you did, you would know that I would never disparage anyone behind their back, so there is no concern regarding that. But it is entirely up to Joey - and you - if I speak about him publicly. The possibility of my commenting publicly about Joey is extinguished as soon as you confirm to me in writing that Joey has already been relieved of any actual working authority or appearance of authority. I trust that your failure to have already confirmed this to me is a simple oversight on your part, as you surely have days ago taken this standard step. Obviously it would be very confusing if Joey continued to present himself internally and externally with the appearance of authority while these issues are being investigated.

Furthermore, I hope you don't misunderstand how important this is to me, because of the nature of Joey's "job", which was to be my surrogate speaker. This position is highly personal to me and it is irrelevant to me if anyone else understands or agrees. My reputation is *mine* to protect. I know for certain that Joey is unethical and my brand is ethics, so he cannot publicly speak in any way that implies my implicit endorsement. Joey does not have a behind the scenes desk job. His job was to publicly speak for me when I could not. As I will not tolerate any confusion on the matter, you must take charge of the issue or I will. Let us not fake pretend that AFLDS ≠ Dr. Gold. There is no separating us publicly. Therefore he cannot speak for AFLDS publicly as that would be my implicit endorsement of him - which is a breach of ethics for me. Know that I will not bend an inch on this - nor should you expect me to.

I have no interest in publicly maligning Joey - that is not who I am - but I will aggressively defend my own reputation - and him appearing to have my support is harmful to my reputation. I'm willing to be silent publicly on Joey once you confirm he's paused from even the appearance of authority within/out the organization.

**Third, removing Joey from organizational work** is critical, because Joey is uniquely positioned to harm the organization itself. For example, I set a very intentional process of hiring, specifically selecting for mission-driven people, and part of that process was bringing on people who would work for free or low paid. Joey threw my highly intentional approach out the window for himself and his assistant. These two facts by themselves are corrupt and that corruption is very harmful for the organization, no matter the reason, which also happened to be unethical, as he had no authority to pay himself more or his assistant more.

Until Joey put his hand in the cookie jar, until Joey paid his personal assistant double and attempted to leapfrog her over the Communications Director, until Joey tried to fire our outstanding Social Media Director who grew me from zero to half a million followers, until Joey tried to sideline our Executive Director, AFLDS workers knew AFLDS was the most ethical

organization they ever encountered. *His throwing my high ethical standards to the wind must be stopped at once.* You must ensure that the AFLDS team is all made aware that he is on hiatus during your investigation, so that processes can normalize. If you ensure this, I will also refrain from any public commentary about Joey. This must be announced at the Monday Leadership meeting. It can be a simple brief announcement, likely the most appropriate person is General Counsel or he can delegate. The only other step is that Joey has to make sure he does not use my name/likeness etc. at any public events.

Relatedly, I ask that there is no delay on your confirming my terms. As I have (already) permanently revoked his permission to speak for me, your investigative process is entirely irrelevant to the fact that he must not appear to be speaking for me both outside the organization and he must be relieved of any appearance of authority within the organization. If I don't get written confirmation of this by Friday 5 pm, I am not sure what I will do. I love AFLDS and I want the best for her, and I will have to decide if it's better to be silent or public if Joey is still public-facing. That's a rock and a hard place for me.

**But most important of all, your email has conflated Joey's unpaid Board seat and his paid work. That is a glaring omission - and you should know that it is causing me to doubt the stated intention. Your first order of business is to reassure me that Joey has been removed from the Board. It is fine to do an investigation but Joey's departure from the Board does not depend upon that.**

As I will not work with Joey Gilbert on the Board, all the Board needs to decide is if my presence or absence is better for the nonprofit. This is not a serious question of course. You can watch any of Joey's speeches for the answer; you can talk to the fundraiser for the answer; you can talk to the large donors for the answer, you can talk to the social media director for the answer, you can talk to the intaking mail center that is still opening the tens of thousands of letters that are still pouring in, you can talk to the accountant to find out if we are fiscally healthy. Not even Joey and all the Board members can retreat from their public praise as the proof is too overwhelming. I am, ironically, a victim of my success. Joey has become covetous of the millions of people and millions of dollars - neither of which he has earned. Removing a member from the Board when the Founder and Visionary and Rainmaker has lost faith and trust in that member is hardly rocket science. The Board is shirking its duty because it doesn't want to do it - two grown men are hiding behind you - and they need to stop it.

Although I was particularly detailed about why I cannot work with Joey - I think my desire for transparency ended up confusing people. At the end of the day, it seems folks are losing sight of the reality that it is wholly irrelevant if Joey is a saint or a sinner. The fact that I challenge *everyone* who was lying or misleading (the hospitals, the doctors, the lawyers, the politicians, the media, the pharmacists, the government etc.) is why AFLDS is successful. I have raised millions, intend to raise millions more, and have incredible ideas for 2023; I have built a great organization and shattered so many records; and I am telling you that there's this one person in

the organization whose ethics are intolerable to me. Exactly how is this complicated? And exactly how is this a surprise that I feel so strongly about ethics?! This is who I am and this is exactly what people want from me.

It is your job to make sure the Board members immediately do their duty. Either we continue our awesome growth trajectory or implode in a public and painful death. The only reason they haven't done their duty yet, best I can tell, is the bromance between the boys and/or inexperience with such matters and/or no adult in the room requiring them to do something they don't want to do. You must be that adult.

Joey's failure to resign when the Founder (whom he has repeatedly publicly stated is the magic) told him it was necessary for the best interest of the nonprofit, is just one more example of his ethically challenged character. Neither Jurgen or Mack would ever do that if I had told them they were standing in the way of my being productive. It demonstrates that Joey does not even care about the welfare of AFLDS. Board members are there to humbly serve. Joey is the type of person who will not relinquish power easily and the Board's tiptoeing is improper. His removal from the Board is not negotiable. I am highly concerned that you have conflated his two positions - I well know how talented you are Sally - George and others sing your praises. I'm telling you the two remaining Board members need your expert guidance to do something they don't want to do that is personally unpleasant. Well I find this whole thing unpleasant too! But AFLDS comes first.

Are you willing to advise them (against all evidence - money, people, ideas) that the organization is better off without me? As you cannot credibly say that, then you are required to advise the Board to immediately do its duty and act in the organization's best interest which is to vote him off or accept his resignation. This is distracting me from my work. His paid work is a different story. That can be decided with an investigation so all people are satisfied that the process was fair. This is certainly not required and it hasn't been done for any other worker who had to leave but it's not unreasonable. But first the Board seat must be relinquished as I find it highly suspect that this has not already happened. If you want me to believe that you and the Board are serving the organization, then **I must see proof that you and the Board are serving the organization**. Only then I will know we are on the same team.

So, here are **my terms to comply** with your request that I: "please refrain from sharing this information with others. On a related note, and in response to some of your recent emails, I strongly recommend that you do not ask donors to refrain from donating to AFLDS, disparage Joey to donors or others, or share any information about this investigation with donors or otherwise."

**By Friday 5 pm PT please confirm in writing that:**

1. Joey Gilbert has been instructed not to present himself with the appearance of authority to speak for AFLDS or me. This includes public speeches, interviews etc.

2. General Counsel( or he can designate to another Leadership person) to announce on Monday's Leadership call that Joey Gilbert is on hiatus. As no one reports in/out to Joey and he does no actual day to day work for the organization, this has absolutely no effect on the organization itself, but because Joey has presented himself to the workers as though he has more authority than he does, this is required.

3. You have either received Joey's resignation or the two remaining Board members have voted to remove Joey. I want to be very clear so you know that Joey's resignation or removal is the **only** thing that will prove to me that the Board is fighting for the same thing I am: the best for AFLDS. Should I **not** learn of Joey's removal by Friday 5 pm, I will know for certain that Jurgen and Mack do not have AFLDS' best interest in their hearts. Then I will have to decide my next steps as I won't continue like this. My time is too valuable to go around in circles on the very straightforward issue of my own Board making it possible for us to continue to be effective. I give you my word I would never do/say anything without alerting/discussing with you or your team. And that I don't have any time to ponder anything at the moment anyway. For example, this week in addition to dealing with this, I had to travel, it was the Jewish High Holidays and I met with two donors and I had to prep vs. MBC. All next week I have a critical issue to work on vs. the Medical Board of California and I have two keynote speeches to give and two donor meetings plus travel. So you need to understand my perspective Sally: due to their inaction and lack of care for me, I no longer believe this Board cares about AFLDS. All three men appear to be prioritizing either their own self-interest (Joey) or reducing their own personal discomfort (Jurgen, Mack.) I work myself to the bone for AFLDS, there are extraordinary results to show for my work, and my Board doesn't know what to do? Please. I simply don't need or want this. Joey's removal needs to occur by Friday 5 pm.

And lastly, come on. I play on #TeamReality not #TeamLunacy. Everyone has to stop pretending this is complicated. I am the Rainmaker and I don't have faith in him. It's over. Should Joey have the organization's best interest at heart, he will do his duty. If he does not, the Board must. If they do not, they have spoken and I have heard them.

Ty

On Oct 6, 2022, at 4:11 PM, Sally R Wagenmaker <[sally@wagenmakerlaw.com](mailto:sally@wagenmakerlaw.com)> wrote:

Dear Simone,

I am in receipt of your correspondence and related emails raising significant allegations of misconduct against Joey Gilbert, seeking his removal from AFLDS, and seeking to regain your director role with AFLDS. Please be assured that the AFLDS board and its legal counsel are addressing such serious matters with all due consideration and appropriate urgency, in accordance with applicable legal parameters and best practices. In particular, and upon my legal advice, the non-conflicted directors of the board have authorized my law firm to commence an investigation of such matters.

As part of such investigation, I would like to speak with you in order to gain more understanding and information about this matter. Accordingly, I am copying my attorney colleague Kellye Fabian Story, who is extremely experienced with such matters and will be assisting here. Our legal team will proceed methodically with our investigation and in due time.

As one of our first steps, we would like to meet with you via videoconference. Please let Kellye and me know a few times that would work well for you, next week or the following week.

Please note too that we consider this investigation confidential at this point, as part of AFLDS's board governance. Accordingly, please refrain from sharing this information with others. On a related note, and in response to some of your recent emails, I strongly recommend that you do not ask donors to refrain from donating to AFLDS, disparage Joey to donors or others, or share any information about this investigation with donors or otherwise. All such actions would be in violation of your own fiduciary responsibilities owed in connection with your AFLDS leadership and could otherwise be legally problematic. Kellye and I can share further about such matters during our upcoming discussion together.

Thank you for your consideration of this matter, and I look forward to hearing back from you.

Sincerely,

**SALLY WAGENMAKER** | [Attorney at Law](#) | 312-626-1600  
[Wagenmaker & Oberly, LLC](#) | *Trusted Advisors to Nonprofits*

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November 1, 2022

Sally Wagenmaker, Esq.  
Wagenmaker & Oberly  
53 W. Jackson Blvd – Suite 1734  
Chicago, IL 60604

Re: Termination of Legal Services for Free Speech Foundation

Dear Ms. Wagenmaker,

Thank you for the legal services your firm has provided the Free Speech Foundation (“FSF”) this past year. However, since FSF is moving in a different direction we are no longer in need of those services, effective immediately. I will personally work with you over the next two weeks to ensure we have a smooth transition in concluding this matter.

For your reference, please find the attached copy of the notice letter that I recently sent to the sole additional FSF Board of Directors (“BOD”) member aside from myself, Joseph Gilbert, with courtesy copies sent to non-Board members Pastor Jurgen and Sheriff Richard Mack. Notice will also be provided to all FSF staff within 24 hours of today, so that everyone has a clear and consistent understanding. I have been the President and Board chairman of FSF since its original incorporation, and I am continuing in that role as the proposal for my resignation from FSF back in March was not legitimately accepted by FSF nor became legally effective for the reasons stated in my above referenced letter.

On the advice and opinion of counsel, the series of discussions since February pertaining to BOD changes was **legally a non-event** as FSF never fully executed the proposed Consulting Agreement (copy enclosed) and after eight (8) months never fully provided the consideration agreed nor in good faith cured the proposed Consulting Agreement, which was the basis of our earlier negotiations.

Furthermore, I never received formal “termination” under paragraph 8 of the “proposed” agreement, but Mr. Gilbert disregarded this in moving forward to remove me from the Florida corporate FSF filing on August 1, 2022 (copy attached) using the Arizona certificate of good standing for FSF as the basis of the filing. In short, this action is void on its face as I am still the Board Chairman and President of FSF under the Arizona charter of FSF. Therefore, effective immediately please direct all verbal and written communication directly to me as Chairman of the Board. Any communications from you or your designee made to any FSF board member or staff



member without my written consent will be considered a conflict of interest and such conflict is not waived.

Due to the disruption caused by Mr. Gilbert and the detailed report of serious ethical breaches which I provided to the BOD and to counsel, the Board will review and promptly conclude an investigation. That is, however, no longer your concern. I do look forward to conferencing with you later this week to discuss any pending matters you might have for FSF and to resolve any financial considerations. Please ensure there are no communications to any of the persons you incorrectly may have previously considered to have authority over the organization, as this would be a conflict of interest and such conflict is not waived.

Currently, there appears to be legal ethical breaches following the formal allegations of Board member misconduct, which were provided to you and the BOD 29 days ago. Specifically, the ABA Model Rules of Professional Conduct Rule 1.13 clearly indicates that an attorney should have advised the removal of Mr. Gilbert from authority or appearance of authority upon learning of such serious complaints. Because he was not removed pending the investigation, he was emboldened in a power grab, which then caused predictable injury to the organization. I do not understand why this concern about a conflict of interest was ignored.

The review of this professional legal misconduct has reintroduced concerns raised by a previous error when a critical large donation (more than a million dollars) was forfeited based solely on your advice. This donation was subsequently given successfully to an unrelated charity with no negative impact to them, and substantial loss to your client.

We appreciate your understanding of the concern we have with such detrimental developments and the necessary actions we will be taking to secure the survival and future success of FSF.

Sincerely,

*Simone Gold, MD, JD*

Dr. Simone Gold  
President and Board Chairman  
Free Speech Foundation



November 1, 2022

All AFLDS Team Members

Free Speech Foundation  
1645 W. Valencia Rd #109-193  
Tucson, AZ 85746

Re: Recusal and Ethical Investigation of Mr. Joseph Gilbert

Dear AFLDS Team,

Two scriptures meant a great deal to me in prison.

Joshua 1:9 “Have I not commanded you? Be strong and courageous. Do not be afraid, do not be discouraged, for the Lord your God is with you wherever you go.”

Exodus 50:20 “You intended to harm me, but God intended it all for good. He brought me to this position so I could save the lives of many people.”

I handpicked almost every single person at AFLDS. What I know is that you are courageous and you will not align with corruption. There has been a breach of ethics within AFLDS and it must stop now. “Whisper campaigns” are only possible when the truth is withheld, so I need to provide everyone with the same information as everyone else. You will likely hear continued whispers and rumors after my announcement, but I encourage you to remember what brought you to AFLDS, and to remember that the truth has nothing to fear, while darkness cannot survive the sunlight of examination.

It is with great sadness that I must announce to you that Joey Gilbert has repeatedly acted unethically, exhibiting a clear and longstanding pattern of inappropriate and damaging behavior. The violations are severe, including numerous improper financial dealings, all while he is publicly threatening all of you—the people who do the work—with pay cuts and termination. This ends immediately. AFLDS will not tolerate corruption, nor allow a culture of fear and bullying. Any of these recent hirings/firings/promotions/demotions that you may have heard about or wondered about are illegitimate and legal non-events.

I’m reminded of the character Gordon Gekko who said “greed is good”, from the 1980’s movie Wall Street. Gekko was the silver tongued character who masterminded “hostile takeovers”, destroying companies by reducing them to their components and then selling the pieces. The lesson to learn is that not everyone has the righteous motives they portray, and not everything you hear



is the full truth about a circumstance. Proverbs 18:17 says “The first to plead his case seems right, until another comes and examines him.”

Since founding this organization in June of 2020, I have always been and I continue to be the Chairman of the Board and President of America’s Frontline Doctors. Mr. Gilbert and his counsel have received copies of all relevant documentation and he has been thus informed to immediately stop acting or presenting himself as having any authority over or within AFLDS. The welfare of every team member is a responsibility I take very seriously, and I will not allow good people to be mocked or harmed. Sadly, Mr. Gilbert has already engaged in defamation, spreading malicious rumors of embezzlement, fancy homes, and other deceptive gossip. This slander must cease, and appropriate legal action will be taken. All AFLDS operations are carefully documented to maintain legal and ethical compliance with all relevant state and federal laws. This will continue, as always.

In March of this year, I was willing to consider the suggestion of stepping down from the AFLDS Board of Directors on the advice of certain legal counsel, because there was a lot of hostile attention placed on AFLDS and my highest priority is always to secure the best interest of the organization. However, this change never actually occurred legally, as the proposed contract was not fulfilled. **All original and current legal filings that are legitimate and establish the Free Speech Foundation as a 501(c)(3) in good standing, confirm that I am the President and Chairman of the Board.** I was very patient over the last many months and thoughtful in making every possible effort to rectify inappropriate behaviors in a more discreet manner with direct communication to Mr. Gilbert and his counsel, but those efforts made in good faith have all been aggressively rejected, and the misbehavior has worsened; so I will not tolerate any further damages. With wise guidance and legal counsel, I will be leading AFLDS through this difficult period of necessary internal investigation, and we will swiftly restore honor, propriety, and ensure the continuation of complete legal compliance.

Under my leadership, you do not need to be afraid. We will continue to work collaboratively against the tyranny and corruption all around us. I have exciting plans for AFLDS in 2023 and beyond! The best is yet to come. I want to thank each one of you for your courage, perseverance, and most of all your commitment to righteousness; doing what you know to be honorable and just, no matter how difficult or costly. Such character cannot be overcome by evil.

Let us overcome evil with good.

Always your in humility,

A handwritten signature in cursive script that reads "Simone Gold, MD, JD".

Dr. Simone Gold  
President and Board Chairman  
Free Speech Foundation



FOR IMMEDIATE RELEASE

**Dr. Simone Gold Reaffirms Her Leadership Role at America's Frontline Doctors (AFLDS) and Announces Organizational Reform and Future Initiatives**

November 3, 2022

*Dr. Simone Gold, Prominent Doctor, Lawyer, Founder of AFLDS and Challenger of the Covid Narrative, Presents Board Investigation and Review of Internal Safeguards to Ensure the Fiscal Health of AFLDS Going Forward*

Tucson, ARIZONA – recently returning from a hyper-partisan political incarceration, Dr. Simone Gold reaffirmed her leadership role as Founder, President, and Board Chairman of America's Frontline Doctors (AFLDS) at the company meeting this week. Due to the hostile environment that AFLDS was operating in because of Gold's persistent challenges to the government's coronavirus propaganda, in the Spring of this year Gold discussed with her fellow Board members the possibility of her transitioning away from the Board in the best interest of the organization. Those discussions were never legally actualized, however, with Gold nevertheless admirably performing her professional obligations despite organizational assurances to her remaining unfulfilled, amidst increasing government and media opposition.

For months, as Gold worked through her numerous personal and professional challenges and subsequent imprisonment, the following scripture was one of two that sustained her - Joshua 1:9 "Have I not commanded you? Be strong and courageous. Do not be afraid, do not be discouraged, for the Lord your God is with you wherever you go."

Although Gold continues to rely on most of her management team to continue the day-to-day operations of AFLDS as she returns to resume her role as Board Chairman, Gold regrettably announced today that Joseph Gilbert, Esq., a board member as well as a paid consultant at AFLDS for some time, was being investigated for directing inappropriate expenditures, hirings, and firings for his personal benefit. Gold stated: "It is with great sadness that I must announce that Mr. Gilbert has repeatedly acted unethically, exhibiting a clear pattern of inappropriate and damaging behavior...including numerous instances of self-dealing and threats made to employees of financial retaliation and termination if they failed to comply with his demands...AFLDS will not tolerate corruption, nor allow a culture of fear and bullying." An internal audit and investigation are currently underway to review financial records and board actions taken while Gold was indisposed in prison.

Despite so many strenuous circumstances, Gold is excited to fully reengage with her team and thanks them all for their strength, perseverance, and most of all their commitment to righteousness. Gold would also like to thank her family, donors, and the public that have supported her throughout this difficult time.

Dr. Gold intends to share new plans for visionary efforts at AFLDS over the next several months, including its mission to expose CDC and FDA corruption and "Drain the Science Swamp."

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**About AFLDS**

*America's Frontline Doctors is the nation's independent authority on ethical and transparent standards in science, health, and human rights. We provide individuals with unbiased and accurate information from the world's top experts in medicine and law so you can be empowered with facts to protect your rights, take care of your health, and safeguard your future. AFLDS.org*

**Media Contact** Lisa Alexander, Communications Director | [Media@AFLDS.org](mailto:Media@AFLDS.org)



November 3, 2022

Lauren Bradford  
3860 20th Ave SE  
Naples FL 34117

Re: Suspension of Employment

Dear Ms. Bradford,

Thank you for your past service to AFLDS. It has come to my attention that you have failed to comply with explicit instructions regarding communications with Mr. Gilbert, and explicit instructions to report directly to the Executive Director Lisa Andrzejewski and obtain her approval of any of your AFLDS actions or communications. Effective immediately, you are suspended without pay pending an internal investigation, and we will contact you within the next week to schedule further discussions about your future with AFLDS.

Please be advised, you (and any entity you manage or own) no longer have authorization to act on behalf of AFLDS in any capacity, nor present yourself to anyone as a representative of AFLDS in any way. Furthermore, you no longer have authorization to use, send, post, share, or otherwise access any AFLDS content, materials, or any other property belonging to AFLDS, and any further actions presuming such authority will be prosecuted to fullest extent of the law.

Sincerely,

A handwritten signature in black ink that reads "Simone Gold, MD, JD". The signature is written in a cursive, flowing style.

Dr. Simone Gold  
President and Board Chairman  
Free Speech Foundation