

IN THE CIRCUIT COURT OF THE FOURTH JUDICIAL CIRCUIT
IN AND FOR DUVAL COUNTY, FLORIDA
CIVIL DIVISION

CHARLES STOVALL WEEMS, IV
and KERRI WEEMS

Case No.: 2022-CA-1047

Plaintiffs,

Division: CV-F

v.

CELEBRATION CHURCH OF
JACKSONVILLE, INC., KEVIN
CORMIER, MARCUS ROWE,
ANGELA CANNON,
JACOB WILLIAM, and
LEE WEDEKIND, III,

Defendants.

THIRD AMENDED COMPLAINT¹

Plaintiffs, Charles Stovall Weems, IV (“Pastor Weems”) and Kerri Weems (“K. Weems”), sue Defendants, Celebration Church of Jacksonville, Inc. (“Celebration Church”), Kevin Cormier (“Cormier”), Marcus Rowe (“Rowe”), Angela Cannon (“Cannon”), Jacob William (“William”), and Lee Wedekind, III (“Wedekind”), and allege as follows:

¹ Plaintiffs file this Third Amended Complaint with full reservation of rights and as directed and pursuant to the rulings set forth in the Court’s September 28, 2022 *Order Granting Defendants’ Motions to Dismiss for Lack of Subject Matter Jurisdiction and Dismissing Plaintiffs’ Claims*. By filing this Third Amended Complaint, Plaintiffs do not intend to waive or abandon their rights to argue in any subsequent appeal that the claims as alleged in their Second Amended Complaint were proper and not barred by the Ecclesiastical Abstention Doctrine, now waive or abandon any of the positions asserted in their filings and arguments opposing Defendants’ Motions to Dismiss the Second Amended Complaint.

INTRODUCTION

1. This case presents an egregious example of what happens when a group of people decide to weaponize false information to inflict harm on others and advance their personal and economic agendas, demonize someone they target as an adversary, and deceive the public into believing salacious lies are true.

2. Defendants created, leaked to the press, and published on Celebration Church's public website a "Report of Investigation" containing knowingly false and defamatory statements accusing Plaintiffs of committing crimes and violating secular laws, as well as disclosing surreptitiously obtained private mental health information concerning K. Weems.

3. Defendants launched their outrageous, libelous attack *after* Pastor Weems had already resigned and completely separated himself and his family from Celebration Church.

4. Pastor Weems and K. Weems bring this action to clear their names; establish the falsity of the scandalous narrative and statements Defendants published about them; recover damages for the substantial injuries Defendants' lies and tortious conduct have caused; and prevent Defendants' continued publication of defamatory falsehoods and private information about Plaintiffs.

PARTIES, JURISDICTION, AND VENUE

5. This is an action for equitable relief and damages in excess of \$30,000.00, exclusive of interest, costs, and attorneys' fees.

6. Plaintiff, Pastor Weems, is an individual who lives, works, and serves his community in Duval County, Florida.

7. Plaintiff, K. Weems, is an individual who lives, works, and serves her community in Duval County, Florida.

8. Defendant, Celebration Church, is a Florida not for profit corporation with its principal place of business at 9555 R.G. Skinner Parkway, Jacksonville, Florida 32256.

9. Defendant, Cormier, is an individual residing in Duval County, Florida.

10. Defendant, Rowe, is an individual residing in Duval County, Florida.

11. Defendant, Cannon, is an individual residing in Orange County, Florida.

12. Defendant, William, is an individual residing in Palm Beach County, Florida.

13. Defendant, Wedekind, is an individual residing in Duval County, Florida.

14. Defendants, directly and/or through employees, agents, authorized representatives, co-conspirators, and/or other persons, entities, and/or representatives acting under their management, direction, and/or control, engaged in numerous contacts in and with the state of Florida associated with the planning, creation, and publication of the false and defamatory statements and private information about Plaintiffs upon which this action is based, which were published to, accessible to, and accessed and viewed by residents in Duval County.

15. Venue is proper in Duval County, Florida pursuant to Chapter 47, Florida Statutes, because Celebration Church's principal place of business is in Duval County, Florida, one or more individual Defendants reside in Duval County, Florida, and the causes of action alleged herein accrued in Duval County, Florida.

16. Based on the facts alleged throughout this Amended Complaint, this Court has personal jurisdiction over each of the Defendants under Section 48.193, *Florida Statutes*, because they each personally or directly, in concert with one another, and/or through an employee, agent, co-conspirator, and/or other person or entity acting under their management, direction, and/or control, engaged in one or more of the following acts:

- A. committing tortious acts within the state of Florida;
- B. committing intentional torts expressly aimed at Florida, effects of which were suffered in Florida;
- C. operating, conducting, engaging in, or carrying on a business or business venture within the state of Florida, or having an office in Florida;
- D. engaging in substantial and not isolated activity within the state of Florida; and/or
- E. engaging in a conspiracy to commit tortious acts against Plaintiffs within the state of Florida and engaging in overt acts in furtherance of that conspiracy within the state of Florida.

17. Based on the facts alleged throughout this Amended Complaint, sufficient minimum contacts exist between each Defendant and the state of Florida to satisfy Due Process under the United States Constitution because Defendants: (1) engaged in substantial and not isolated activity within and directed at the state of Florida; (2) reside, maintain an office, and/or conducted business through agents located in the state of Florida; and/or (3) committed or conspired to commit intentional torts expressly aimed at Florida, the effects and harms of which were calculated to and did cause injury within the state of Florida. Accordingly, each of the Defendants could and should have reasonably anticipated being sued in the state of Florida for the claims alleged herein.

18. At all times material to this action, Defendants were the agents, licensees, employees, partners, joint-venturers, co-conspirators, masters, and/or employers of one another, and each of them acted within the course and scope of that agency, license, partnership, employment, conspiracy, ownership, or joint venture relationship with one another. At all times material to this action, each Defendant's acts, failures to act, and misconduct alleged herein were known to, authorized, approved, and/or ratified by the other Defendants; and such acts, omissions, and misconduct were engaged in by the Defendants in concert or active participation with one another or to aid or abet one another.

19. Defendants' actions, failures to act, and misconduct alleged herein produced and/or substantially contributed to producing the damages, injuries and harms Plaintiffs suffered, for which they seek recovery and redress through this action; which injuries and harms occurred in the state of Florida and the greatest effects of which were suffered within the state of Florida.

20. All conditions precedent to the filing and maintenance of this action have occurred, have been performed, and/or have been waived.

21. The causes of action alleged herein accrued after Pastor Weems and K. Weems were no longer employed by or members of Celebration Church and are based on tortious misconduct that does not directly implicate matters of church governance or pastoral discipline. Accordingly, the Ecclesiastical Abstention Doctrine and Christian Alternative Dispute Resolution provision of Celebration Church's Bylaws do not apply to the claims alleged herein, and this Court has subject matter over this action.

COMMON FACTUAL ALLEGATIONS TO ALL COUNTS

22. On April 15, 2022, Pastor Weems tendered his resignation as Senior Pastor, President, Chief Executive Officer, Chairman and member of the Board of Trustees, and registered agent of Celebration Church, terminated Plaintiffs' church membership, and legally separated them from the Church.

23. On or about April 24, 2022, Defendants created, leaked to the press, and published their "Report of Investigation to Celebration Church of Jacksonville, Inc." (the "Defamatory Report"), attached hereto as **Exhibit A**, which was drafted by Wedekind and finalized in consultation with Cormier, Cannon, Rowe, and William (the "Trustees"), with every intention of making the report public.

24. The Defamatory Report was prepared to convict Pastor Weems and K. Weems in the court of public opinion and is accordingly filled with blatantly false statements accusing Plaintiffs of committing crimes and violating secular laws, even though these false statements are refuted by documents and information of which Defendants were fully aware and which they deliberately omitted from the defamatory Report to falsely portray Pastor Weems and K. Weems as criminals.

The False and Defamatory Statements²

25. The Defamatory Report contains the following false and defamatory statements:

² Pursuant to the Court's September 28, 2022 Order and rulings therein, and subject to the reservation of rights set forth in Footnote 1, above, the false and defamatory statements identified herein are limited to those portions of the Defamatory Report that falsely accuse Plaintiffs of violating secular laws and/or engaging in misconduct that do not require consideration of discipline, faith, internal church organization, or ecclesiastical rule, custom, or law. This should not, however, be construed as an admission that any other portions of the Defamatory Report are true. Plaintiffs explicitly deny all accusations against them in the Defamatory Report.

- (a) The “Summary” section of the “Findings of Fact” [Defamatory Report at p. 6] falsely states that Stovall Weems “engaged in a series of improper and unauthorized financial transactions through which he personally benefitted, either directly or indirectly, at the expense of the church”;
- (b) The “Improper Financial Transactions” section of the Defamatory Report [Id. at p. 13-14 and p. 20] falsely states that the Weems’s made “material misrepresentations” to Wesleyan Investment Foundation (“WIF”) and “embezzled profit” from the sale of the 16073 Shellcracker Road;
- (c) The “Improper Financial Transactions” section of the Defamatory Report [Id. at pp. 15-18] falsely asserts that Pastor Weems did not use any of the proceeds from Celebration Church’s “Second PPP Loan” for permitted expenditures, but rather to purchase TurnCoin³ and that “these expenses were not permitted under the PPP loan program and would result in the church’s inability to seek forgiveness of the loan,” as well as that Weems “was also deceptive about the TurnCoin investments...[and]...how he showed these investments on Celebration’s financial statements” and “derived a direct financial benefit from these transactions”;

³ TurnCoin is a digital security that was brought to the attention of the Celebration Church by Cannon, who is an investor and a member of the advisory board for TheExchange, Inc. (the USA member of TurnCoin Global). Investigation of this SEC regulated digital security disclosed solid management and a platform in which it is anticipated that celebrities participating would donate part of their revenues back to charities with missions similar to the church’s missions outreach – Heart of Compassion Foundation, the Heart of Sport Foundation and the Chen Foundation.

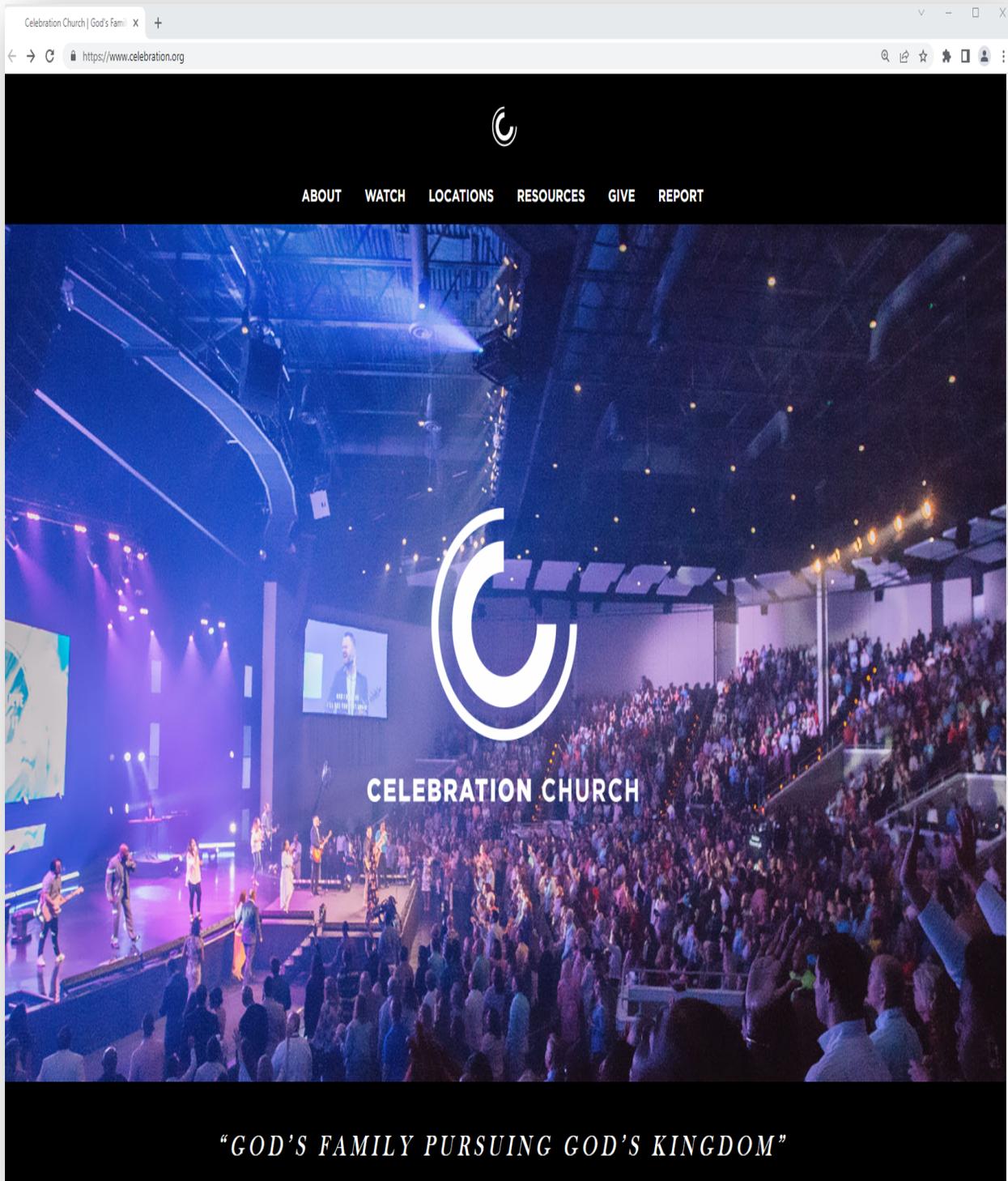
- (d) The “Improper Financial Transactions” section of the Defamatory Report [Id. at pp. 18-19] falsely states that the Weems’s engaged in the “Fraudulent Mischaracterization and Cancellation of Honey Lake Farms Debt” and falsely accuses them of “manipulation of financial statements in connection with a loan application” and the “fraudulent manipulation of HLF’s financial statements and unauthorized debt forgiveness in connection with a loan application [which] violates Florida and federal law”;
- (e) The “Improper Financial Transactions” section of the Defamatory Report [Id. at p. 19] falsely states that the Weems’s engaged in the “Misappropriation of Designated Funds” donated to AWKNG for an “improper and unauthorized purpose”;
- (f) The “Improper Financial Transactions” section of the Defamatory Report [Id. at p.p. 19-20] falsely states that Pastor Weems “unilaterally” changed banks in early 2021, causing the revocation of the church’s credit line and that Weems “deplet[ed] the church’s cash reserves”;
- (g) The “CONCLUSIONS” section of the Defamatory Report [Id. at p. 20] falsely states that “Stovall Weems violated the law by breaching his fiduciary duties to Celebration, committing fraud, unjustly enriching himself at the expense of the Church, and failing to meet the fiduciary duties and standards of care required by his office” and “brought Celebration to the brink of insolvency”;
- (h) The “RECOMMEDNATIONS” section of the Defamatory Report [Id. at p. 22] falsely states that Plaintiffs should be “require[d] to account for and return

to the Church all funds misappropriated” and that that Plaintiffs should be reported “to the appropriate authorities” to determine whether “criminal charges should be brought.”

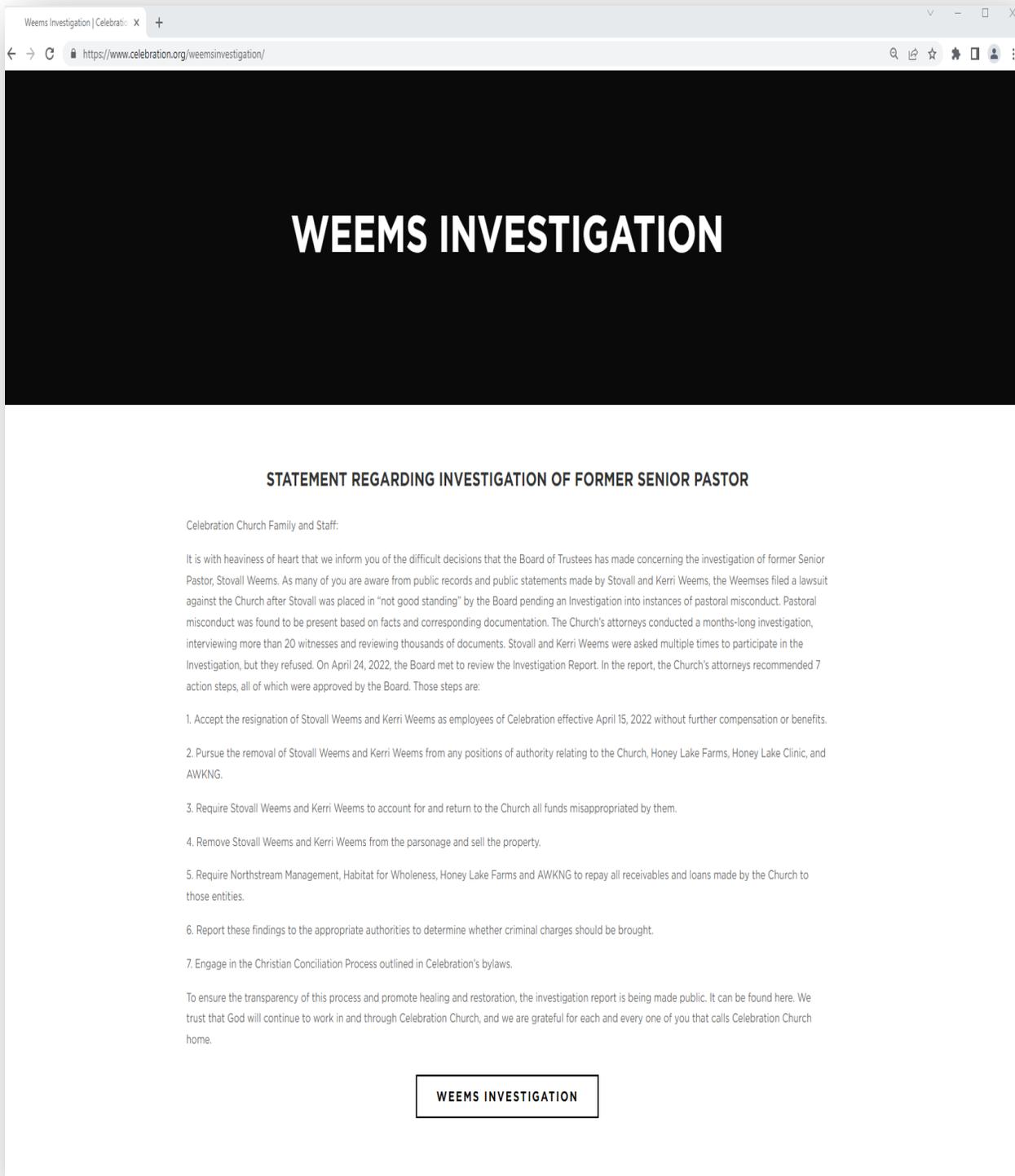
The Widespread Publication and Dissemination of the Defamatory Report

26. On or shortly before April 24, 2022, the Trustees authorized and approved the widespread public dissemination of the Defamatory Report prepared by Wedekind, including by leaking it to the press and posting it on Celebration Church’s public website (NOT through internal Celebration Church communication channels with its Members).

27. In fact, Celebration Church updated its homepage on its website for the general public to include a conspicuous new menu option titled “Report” alongside the existing, common menu items such as “About,” “Locations,” and “Watch”:



28. The “Report” menu option leads to a page titled “Weems Investigation”:

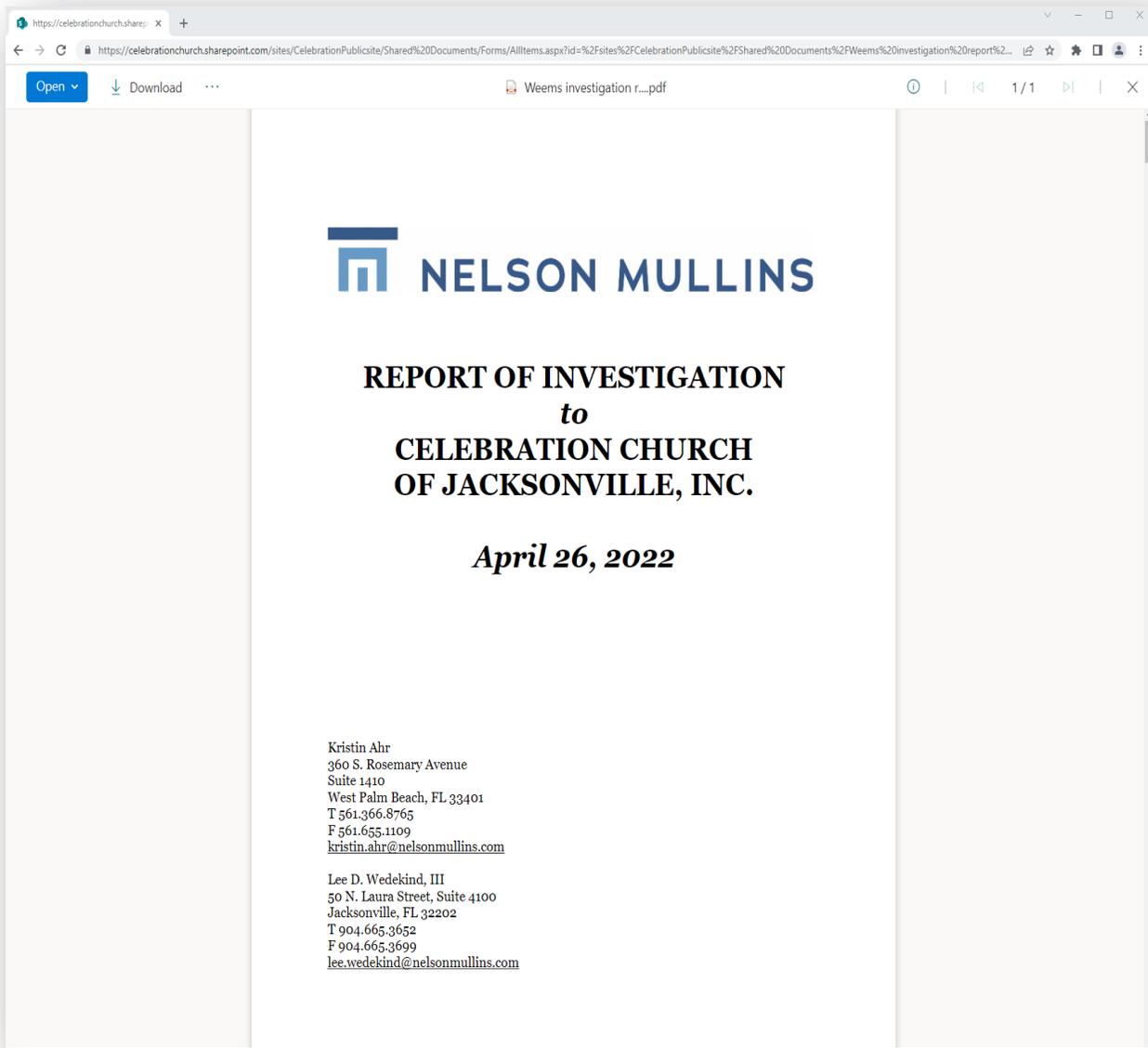


29. This page contains a “Statement” that, among other things, falsely reiterates many he same false and defamatory statements outlined in paragraph 26, above, and lists the same 7 “action steps” included within the “RECOMMENDATIONS” section of the

Defamatory Report, among them requiring Pastor Weems and K. Weems “to account for and return to the Church all funds misappropriated by them” and “report these findings to the appropriate authorities to determine whether criminal charges should be brought” even though Pastor Weems and K. Weems never engaged in any criminal conduct or misappropriated any funds from the Church.

30. The bottom of Celebration Church’s “Weems Investigation” page contains a hyperlink⁴ that leads to a pdf of the Defamatory Report, which visitors are free to view and download:

⁴<https://celebrationchurch.sharepoint.com/sites/CelebrationPublicsite/Shared%20Documents/Forms/AllItems.aspx?id=%2Fsites%2FCelebrationPublicsite%2FShared%20Documents%2FWeems%20investigation%20report%20%284%2D26%2D2022%29%2Epdf&parent=%2Fsites%2FCelebrationPublicsite%2FShared%20Documents&p=true&ga=1>



31. Defendants knew and intended when they conspired to create and post the Defamatory Report and accompanying Statement on Celebration Church’s website page intended for the general public that the Defamatory Report and Defendants’ false and defamatory statements would be widely viewed, disseminated publicly, and reported on in the press.

32. Defendants also alerted members of the press to the posting of the Defamatory Report on Celebration Church's website and/or provided them a copy of the Defamatory Report so that it would be widely reported on in the media.

The Defamatory Presentation

33. On or before April 25, 2022, the Trustees also participated in, authorized, and approved the creation and publication a pre-recorded video of Wedekind making the same false and defamatory statements in the Defamatory Report (which are described in Paragraph 25, above). This video was played at a staff meeting attended by numerous lower-level church employees and volunteers.

34. Wedekind pre-recorded this video at the request of the Trustees and knew that it was intended for public dissemination and would be published to third-parties.

Violations of K Weems's Privacy

35. The Defamatory Report also disclosed K. Weems's private, personal medical information and the substance of her private interactions and conversations occurring within the privacy of K. Weems's home.

36. Some of the information disclosed in the Defamatory Report about K. Weems was obtained by Gabriel Sullivan who, at the direction and/or with the approval of the Defendants, surreptitiously and illegally accessed K. Weems' private communications and marriage counseling sessions, thereafter disclosing this private information to the Trustees and/or Wedekind so that it could be published in the Defamatory Report.

37. This reprehensible, outrageous attack on K. Weems in the Defamatory Report included disclosing the following:

Witnesses to the events at the Weems residence in the days following the Encounter describe Weems as visibly shaking and sobbing. They also confirmed that Kerri Weems was distraught and overwhelmed by her husband's behavior. Kerri Weems has a history of clinical depression, a topic which she openly discussed. People close with Kerri Weems stated that she expressed being suicidal as a result of the Encounter and Weems' behavior following it. Despite repeated requests by many, the Weemses refused to take any meaningful time off after the Encounter to process the event.

38. The assertion that K. Weems has a "history of clinical depression" could only have been based on medical records and other private mental health information surreptitiously and illegally obtained by Defendants.

39. The assertions that K. Weems was "distraught and overwhelmed by her husband's behavior" and "suicidal as a result of the Encounter and Weems's behavior following it" are not only false, but yet another clear violation of her privacy because they disclose information based on statements from supposed witnesses with non-disclosure agreements who only could have obtained this information from K. Weems's private interactions and conversations in a private setting (*i.e.*, her home).

40. At the time the Defamatory Report was created, leaked to the press, and published to the general public and others, Defendants were aware that K. Weems is especially sensitive, susceptible, and/or vulnerable to injury caused by mental distress. Thus, their tortious acts were undertaken despite knowledge of K. Weems's emotional vulnerability and are particularly heartless, flagrant, and outrageous.

41. Defendants acts were also committed with a heightened degree of outrageousness because Defendants asserted and abused a position of power, apparent or actual, to damage K. Weems.

Actual Malice

42. Defendants published the above-described false and defamatory statements with actual knowledge of their falsity or reckless disregard for their truth or falsity.

43. Defendants had actual knowledge that the false and statements they published about Plaintiffs were untrue and deliberately published the statements knowing they were false and defamatory.

44. At the very least, Defendants recklessly disregarded the truth of the defamatory statements they published, caused to be published, and/or encouraged to be published about Plaintiffs, or purposefully avoided the truth about the false and defamatory statements about Plaintiffs.

45. Defendants had a predetermined narrative about Plaintiffs and, as part of that preconceived narrative, Defendants deliberately accused Plaintiffs of committing crimes and emphasized the criminal nature of the false charges against Plaintiffs to evoke hatred and contempt toward them.

46. Defendants also intentionally omitted exculpatory facts of which they were aware because those facts disproved the false criminal accusations Defendants were already determined to and did publish.

47. Defendants' personal and economic motivations, as well as their bias against and ill-will toward Plaintiffs, led them to ignore facts of which they were aware and facts which were easily and readily available that refuted and disproved the false criminal accusations about Plaintiffs.

48. Defendants knew the true facts undermined their predetermined narrative about Plaintiffs, so they consciously avoided, disregarded, and deliberately engaged in efforts to conceal and omit evidence that contradicted their preconceived narrative.

49. The false and defamatory statements about Plaintiffs were published in the context of an official attorney “investigation,” which by its very nature and under the circumstances was not urgent and which Defendants were under no legitimate obligation or time pressure to publish before fact-checking.

50. Despite the seriousness of the false charges they leveled against Plaintiffs, Defendants failed to take basic steps to investigate and test the accuracy of their false and defamatory narrative and statements, while consciously ignoring and purposefully omitting facts of which they were aware that disproved the false accusations Defendants leveled against Plaintiffs.

51. Defendants engaged in highly unreasonable conduct constituting an extreme departure from the professional standards ordinarily adhered to by responsible people in their fields.

52. Defendants’ failure to investigate, purposeful avoidance of, and deliberate distortion of the truth was compounded by the inherent improbability of and obvious reasons to doubt the veracity of the false claims made against Plaintiffs, as well as the obvious lack of credibility and known biases of the supposed “witnesses” and the claims they made about Plaintiffs. Defendants all were aware of facts refuting the claims published in the Defamatory Report and Defamatory Presentation.

53. Moreover, the nature and severity of the false and defamatory statements about Plaintiffs and the facts and information of which Defendants were aware at the time of publication were such that Defendants did, in fact, entertain serious doubts as to the truth of the statements, leading to the publication of the statements with a high degree of awareness of their probable falsity.

54. Even a cursory review of the facts surrounding the events described in the Defamatory Report revealed the falsity of the charges made against Plaintiffs. Defendants conducted, were aware of, and had available to them research, information, and documents which showed or easily would have showed that the claims being made about Plaintiffs were untrue.

55. However, Defendants deliberately or recklessly turned a blind eye to the truth and did not ensure that what they were representing as fact about Plaintiffs was correct.

56. Each of the Defendants entertained serious doubts as to the truth of the false and defamatory statements about Plaintiffs, but nevertheless fabricated, directed, and/or encouraged others to make, collaborated with each other to publish, published, and proliferated these false and defamatory statements about Plaintiffs.

COUNT I
(DEFAMATION--PASTOR WEEMS v. CELEBRATION)

57. Pastor Weems re-alleges and incorporates Paragraphs 1 through 56, as if fully stated herein.

58. Celebration Church published, caused to be published, and/or directed or encouraged others to publish the following false and defamatory statements, which did

expose and had the tendency to expose Pastor Weems to hatred, contempt, ridicule and disgrace:

- (a) The “Summary” section of the “Findings of Fact” [Defamatory Report at p. 6] falsely states that Stovall Weems “engaged in a series of improper and unauthorized financial transactions through which he personally benefitted, either directly or indirectly, at the expense of the church”;
- (b) The “Improper Financial Transactions” section of the Defamatory Report [Id. at p. 13-14 and p. 20] falsely states that the Weems’s made “material misrepresentations” to Wesleyan Investment Foundation (“WIF”) and “embezzled profit” from the sale of the 16073 Shellcracker Road;
- (c) The “Improper Financial Transactions” section of the Defamatory Report [Id. at pp. 15-18] falsely asserts that Pastor Weems did not use any of the proceeds from Celebration Church’s “Second PPP Loan” for permitted expenditures, but rather to purchase TurnCoin⁵ and that “these expenses were not permitted under the PPP loan program and would result in the church’s inability to seek forgiveness of the loan,” as well as that Weems “was also deceptive about the TurnCoin investments...[and]...how he showed these investments on

⁵ TurnCoin is a digital security that was brought to the attention of the Celebration Church by Cannon, who is an investor and a member of the advisory board for TheExchange, Inc. (the USA member of TurnCoin Global). Investigation of this SEC regulated digital security disclosed solid management and a platform in which it is anticipated that celebrities participating would donate part of their revenues back to charities with missions similar to the church’s missions outreach – Heart of Compassion Foundation, the Heart of Sport Foundation and the Chen Foundation.

Celebration’s financial statements” and “derived a direct financial benefit from these transactions”;

- (d) The “Improper Financial Transactions” section of the Defamatory Report [Id. at pp. 18-19] falsely states that the Weems’s engaged in the “Fraudulent Mischaracterization and Cancellation of Honey Lake Farms Debt” and falsely accuses them of “manipulation of financial statements in connection with a loan application” and the “fraudulent manipulation of HLF’s financial statements and unauthorized debt forgiveness in connection with a loan application [which] violates Florida and federal law”;
- (e) The “Improper Financial Transactions” section of the Defamatory Report [Id. at p. 19] falsely states that the Weems’s engaged in the “Misappropriation of Designated Funds” donated to AWKNG for an “improper and unauthorized purpose”;
- (f) The “Improper Financial Transactions” section of the Defamatory Report [Id. at p.p. 19-20] falsely states that Pastor Weems “unilaterally” changed banks in early 2021, causing the revocation of the church’s credit line and that Weems “deplet[ed] the church’s cash reserves”;
- (g) The “CONCLUSIONS” section of the Defamatory Report [Id. at p. 20] falsely states that “Stovall Weems violated the law by breaching his fiduciary duties to Celebration, committing fraud, unjustly enriching himself at the expense of the Church, and failing to meet the fiduciary duties and standards of care required by his office” and “brought Celebration to the brink of insolvency”;

(h) The “RECOMMENDATIONS” section of the Defamatory Report [Id. at p. 22] falsely states that Plaintiffs should be “require[d] to account for and return to the Church all funds misappropriated” and that that Plaintiffs should be reported “to the appropriate authorities” to determine whether “criminal charges should be brought.”

59. Celebration Church’s false and defamatory narrative and statements are of and concerning Pastor Weems and reasonably understood to be about Pastor Weems.

60. Celebration Church’s defamatory statements about Pastor Weems are false. Pastor Weems did not engage in any of the misconduct described in paragraph 58, above.

61. As alleged in paragraphs 42-56, Celebration Church published, caused to be published, and/or directed or encouraged others to publish the defamatory narrative and statements knowing that they were false or with reckless disregard for their truth or falsity.

62. Celebration Church’s defamatory statements are defamatory *per se* because they charged that Pastor Weems committed crimes and tended to injure him in his trade, business or profession.

63. In light of Pastor Weems’s standing in the community, the nature of the statements about him, the extent to which the statements were circulated, and the tendency of the statements to injure someone such as Pastor Weems, Celebration Church directly and proximately caused Pastor Weems to suffer significant damages, including substantial reputational harm which is ongoing in nature and will be suffered in the future. Pastor

Weems is also entitled to recover damages for the costs associated with repairing his reputation and/or correcting the defamatory statements.

64. Pastor Weems also suffered humiliation, mental anguish, emotional distress, and embarrassment as a direct and proximate result of Celebration Church's false and defamatory statements.

65. Re-publication of Celebration Church's false and defamatory statements in other publications, online, and through social media, caused Pastor Weems to suffer additional damages; all of which were foreseeable.

66. Celebration Church had actual knowledge that the false and defamatory statements about Pastor Weems would garner significant public and media attention, which it could use (and did use) to advance and promote its own interests and reputation.

67. Celebration Church acted knowingly, intentionally, willfully, wantonly and maliciously, with the intent to harm Pastor Weems, or in blatant disregard of the substantial likelihood of causing him harm.

68. As a direct and proximate result of Celebration Church's tortious conduct, Pastor Weems is entitled to compensatory and special damages in amounts to be proven at trial.

69. As a direct and proximate result of Celebration Church's tortious conduct, and in addition to the quantifiable monetary damages Pastor Weems suffered, he has suffered and will continue to suffer irreparable harm for which there is no adequate remedy at law.

70. Based upon the facts alleged herein, Pastor Weems has the clear legal right to the entry of an injunction prohibiting Celebration Church from publishing and republishing

the defamatory statements in the Defamatory Report, Defamatory Presentation, and statement on the church's website.

71. The public interest would be served by the entry of an injunction prohibiting Celebration Church's tortious conduct.

WHEREFORE, Pastor Weems demands judgment against Celebration Church awarding:

- a. Compensatory and special damages in appropriate amounts to be established at trial;
- b. Injunctive relief prohibiting the publication or republication of the defamatory statements;
- c. Costs associated with this action; and
- d. Such other and further relief as the Court deems just and appropriate to protect Plaintiffs' rights and interests.

COUNT II
(DEFAMATION—PASTOR WEEMS v. TRUSTEES)

72. Pastor Weems re-alleges and incorporates Paragraphs 1 through 56, as if fully stated herein.

73. The Trustees published, caused to be published, and/or encouraged or directed others to publish the following false and defamatory statements, which did expose and had the tendency to expose Pastor Weems to hatred, contempt, ridicule and disgrace:

- (a) The "Summary" section of the "Findings of Fact" [Defamatory Report at p. 6] falsely states that Stovall Weems "engaged in a series of improper and unauthorized financial transactions through which he personally benefitted, either directly or indirectly, at the expense of the church";

- (b) The “Improper Financial Transactions” section of the Defamatory Report [Id. at p. 13-14 and p. 20] falsely states that the Weems’s made “material misrepresentations” to Wesleyan Investment Foundation (“WIF”) and “embezzled profit” from the sale of the 16073 Shellcracker Road;
- (c) The “Improper Financial Transactions” section of the Defamatory Report [Id. at pp. 15-18] falsely asserts that Pastor Weems did not use any of the proceeds from Celebration Church’s “Second PPP Loan” for permitted expenditures, but rather to purchase TurnCoin⁶ and that “these expenses were not permitted under the PPP loan program and would result in the church’s inability to seek forgiveness of the loan,” as well as that Weems “was also deceptive about the TurnCoin investments...[and]...how he showed these investments on Celebration’s financial statements” and “derived a direct financial benefit from these transactions”;
- (d) The “Improper Financial Transactions” section of the Defamatory Report [Id. at pp. 18-19] falsely states that the Weems’s engaged in the “Fraudulent Mischaracterization and Cancellation of Honey Lake Farms Debt” and falsely accuses them of “manipulation of financial statements in connection with a loan application” and the “fraudulent manipulation of HLF’s financial

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statements and unauthorized debt forgiveness in connection with a loan application [which] violates Florida and federal law”;

- (e) The “Improper Financial Transactions” section of the Defamatory Report [Id. at p. 19] falsely states that the Weems’s engaged in the “Misappropriation of Designated Funds” donated to AWKNG for an “improper and unauthorized purpose”;
- (f) The “Improper Financial Transactions” section of the Defamatory Report [Id. at p.p. 19-20] falsely states that Pastor Weems “unilaterally” changed banks in early 2021, causing the revocation of the church’s credit line and that Weems “deplet[ed] the church’s cash reserves”;
- (g) The “CONCLUSIONS” section of the Defamatory Report [Id. at p. 20] falsely states that “Stovall Weems violated the law by breaching his fiduciary duties to Celebration, committing fraud, unjustly enriching himself at the expense of the Church, and failing to meet the fiduciary duties and standards of care required by his office” and “brought Celebration to the brink of insolvency”;
- (h) The “RECOMMENDATIONS” section of the Defamatory Report [Id. at p. 22] falsely states that Plaintiffs should be “require[d] to account for and return to the Church all funds misappropriated” and that that Plaintiffs should be reported “to the appropriate authorities” to determine whether “criminal charges should be brought.”

74. The Trustees’ false and defamatory statements are of and concerning Pastor Weems and reasonably understood to be about Pastor Weems.

75. The Trustee's defamatory statements about Pastor Weems are false. Pastor Weems did not engage in any of the misconduct described in paragraph 73, above.

76. As alleged in paragraphs 42-56, the Trustees published, caused to be published, and/or encouraged or directed others to publish the defamatory statements knowing that they were false or with reckless disregard for their truth or falsity.

77. The Trustees' defamatory statements are defamatory *per se* because they charged that Pastor Weems committed crimes and tended to injure him in his trade, business or profession.

78. In light of Pastor Weems's standing in the community, the nature of the statements about him, the extent to which the statements were circulated, and the tendency of the statements to injure someone such as Pastor Weems, the Trustees directly and proximately caused Pastor Weems to suffer significant damages, including substantial reputational harm which is ongoing in nature and will be suffered in the future. Pastor Weems is also entitled to recover damages for the costs associated with repairing his reputation and/or correcting the defamatory statements.

79. Pastor Weems also suffered humiliation, mental anguish, emotional distress, and embarrassment as a direct and proximate result of the Trustees' defamatory statements.

80. Re-publication of the Trustees' false and defamatory statements by other publications, online, and through social media caused Pastor Weems to suffer additional damages; all of which were foreseeable.

81. The Trustees had actual knowledge that their false and defamatory statements about Pastor Weems would garner significant public and media attention, which they could use (and did use) to advance and promote their own interests and reputations.

82. The Trustees' conduct was committed knowingly, intentionally, willfully, wantonly and maliciously, with the intent to harm Pastor Weems, or in blatant disregard of the substantial likelihood of causing him harm.

83. As a direct and proximate result of the Trustees' misconduct, Pastor Weems is entitled to compensatory and special damages in amounts to be proven at trial.

84. As a direct and proximate result of the Trustees' tortious conduct, and in addition to the quantifiable monetary damages he suffered, Pastor Weems has suffered and will continue to suffer irreparable harm for which there is no adequate remedy at law.

85. Based upon the facts alleged herein, Pastor Weems has the clear legal right to the entry of an injunction prohibiting the Trustees from publishing and republishing the defamatory statements in the Defamatory Report, Defamatory Presentation, and statement on the church's website.

86. The public interest would be served by the entry of an injunction prohibiting the Trustees' tortious conduct.

WHEREFORE, Pastor Weems demands judgment against the Trustees awarding:

- a. Compensatory and special damages in appropriate amounts to be established at trial;
- b. Injunctive relief prohibiting the publication or republication of the defamatory statements;
- c. Costs associated with this action; and

- d. Such other and further relief as the Court deems just and appropriate to protect Plaintiffs' rights and interests.

COUNT III
(DEFAMATION—PASTOR WEEMS v. WEDEKIND)

87. Pastor Weems re-alleges and incorporates Paragraphs 1 through 56, as if fully stated herein.

88. Wedekind created, authored, published, caused to be published, and/or encouraged or directed others to publish the following false and defamatory statements, which did expose and had the tendency to expose Pastor Weems to hatred, contempt, ridicule and disgrace:

- (a) The "Summary" section of the "Findings of Fact" [Defamatory Report at p. 6] falsely states that Stovall Weems "engaged in a series of improper and unauthorized financial transactions through which he personally benefitted, either directly or indirectly, at the expense of the church";
- (b) The "Improper Financial Transactions" section of the Defamatory Report [Id. at p. 13-14 and p. 20] falsely states that the Weems's made "material misrepresentations" to Wesleyan Investment Foundation ("WIF") and "embezzled profit" from the sale of the 16073 Shellcracker Road;
- (c) The "Improper Financial Transactions" section of the Defamatory Report [Id. at pp. 15-18] falsely asserts that Pastor Weems did not use any of the proceeds from Celebration Church's "Second PPP Loan" for permitted expenditures,

but rather to purchase TurnCoin⁷ and that “these expenses were not permitted under the PPP loan program and would result in the church’s inability to seek forgiveness of the loan,” as well as that Weems “was also deceptive about the TurnCoin investments...[and]...how he showed these investments on Celebration’s financial statements” and “derived a direct financial benefit from these transactions”;

(d) The “Improper Financial Transactions” section of the Defamatory Report [Id. at pp. 18-19] falsely states that the Weems’s engaged in the “Fraudulent Mischaracterization and Cancellation of Honey Lake Farms Debt” and falsely accuses them of “manipulation of financial statements in connection with a loan application” and the “fraudulent manipulation of HLF’s financial statements and unauthorized debt forgiveness in connection with a loan application [which] violates Florida and federal law”;

(e) The “Improper Financial Transactions” section of the Defamatory Report [Id. at p. 19] falsely states that the Weems’s engaged in the “Misappropriation of Designated Funds” donated to AWKNG for an “improper and unauthorized purpose”;

⁷ TurnCoin is a digital security that was brought to the attention of the Celebration Church by Cannon, who is an investor and a member of the advisory board for TheExchange, Inc. (the USA member of TurnCoin Global). Investigation of this SEC regulated digital security disclosed solid management and a platform in which it is anticipated that celebrities participating would donate part of their revenues back to charities with missions similar to the church’s missions outreach – Heart of Compassion Foundation, the Heart of Sport Foundation and the Chen Foundation.

- (f) The “Improper Financial Transactions” section of the Defamatory Report [Id. at p.p. 19-20] falsely states that Pastor Weems “unilaterally” changed banks in early 2021, causing the revocation of the church’s credit line and that Weems “deplet[ed] the church’s cash reserves”;
- (g) The “CONCLUSIONS” section of the Defamatory Report [Id. at p. 20] falsely states that “Stovall Weems violated the law by breaching his fiduciary duties to Celebration, committing fraud, unjustly enriching himself at the expense of the Church, and failing to meet the fiduciary duties and standards of care required by his office” and “brought Celebration to the brink of insolvency”;
- (h) The “RECOMMENDATIONS” section of the Defamatory Report [Id. at p. 22] falsely states that Plaintiffs should be “require[d] to account for and return to the Church all funds misappropriated” and that that Plaintiffs should be reported “to the appropriate authorities” to determine whether “criminal charges should be brought.”

89. Wedekind’s defamatory statements are of and concerning Pastor Weems and reasonably understood to be about Pastor Weems.

90. Wedekind’s defamatory statements about Pastor Weems are false. Pastor Weems did not engage in any of the misconduct described in paragraph 88, above.

91. As alleged in paragraphs 42-56, Wedekind created, authored, published, caused to be published, and/or encouraged or directed others to publish the defamatory statements knowing that they were false or with reckless disregard for their truth or falsity.

92. Wedekind's defamatory statements are defamatory *per se* because they charged that Pastor Weems committed crimes and tended to injure him in his trade, business or profession.

93. In light of Pastor Weems's standing in the community, the nature of the statements about him, the extent to which the statements were circulated, and the tendency of the statements to injure someone such as Pastor Weems, Wedekind directly and proximately caused Pastor Weems to suffer significant damages, including substantial reputational harm which is ongoing in nature and will be suffered in the future. Pastor Weems is also entitled to recover damages for the costs associated with repairing his reputation and/or correcting the defamatory statements.

94. Pastor Weems also suffered humiliation, mental anguish, emotional distress, and embarrassment as a direct and proximate result of Wedekind's defamatory statements.

95. Re-publication of Wedekind's false and defamatory statements by Celebration Church, other publications, online, and through social media caused Pastor Weems to suffer additional damages; all of which were foreseeable.

96. Wedekind had actual knowledge that the false and defamatory statements about Pastor Weems would garner significant public and media attention.

97. Wedekind's conduct was committed knowingly, intentionally, willfully, wantonly and maliciously, with the intent to harm Pastor Weems, or in blatant disregard of the substantial likelihood of causing him harm.

98. As a direct and proximate result of Wedekind's misconduct, Pastor Weems is entitled to compensatory and special damages in amounts to be proven at trial.

99. As a direct and proximate result of Wedekind's tortious conduct, and in addition to the quantifiable monetary damages Pastor Weems suffered, he has suffered and will continue to suffer irreparable harm for which there is no adequate remedy at law.

100. Based upon the facts alleged herein, Pastor Weems has the clear legal right to the entry of an injunction prohibiting Wedekind from publishing and republishing the defamatory statements described in the Defamatory Report, Defamatory Presentation, and statement on the church's website.

101. The public interest would be served by the entry of an injunction prohibiting Wedekind's tortious conduct.

WHEREFORE, Pastor Weems demands judgment against Wedekind awarding:

- a. Compensatory and special damages in appropriate amounts to be established at trial;
- b. Injunctive relief prohibiting the publication or republication of the defamatory statements;
- c. Costs associated with this action; and
- d. Such other and further relief as the Court deems just and appropriate to protect Plaintiffs' rights and interests.

COUNT IV
(DEFAMATION--K. WEEMS v. CELEBRATION)

102. K. Weems re-alleges and incorporates Paragraphs 1 through 56, as if fully stated herein.

103. Celebration Church published, caused to be published, and/or directed or encouraged others to publish the following false and defamatory statements, which did

expose and had the tendency to expose K. Weems to hatred, contempt, ridicule and disgrace:

- (a) The “Summary” section of the “Findings of Fact” [Defamatory Report at p. 6] falsely states that Stovall Weems “engaged in a series of improper and unauthorized financial transactions through which he personally benefitted, either directly or indirectly, at the expense of the church”;
- (b) The “Improper Financial Transactions” section of the Defamatory Report [Id. at p. 13-14 and p. 20] falsely states that the Weems’s made “material misrepresentations” to Wesleyan Investment Foundation (“WIF”) and “embezzled profit” from the sale of the 16073 Shellcracker Road;
- (c) The “Improper Financial Transactions” section of the Defamatory Report [Id. at pp. 15-18] falsely asserts that Pastor Weems did not use any of the proceeds from Celebration Church’s “Second PPP Loan” for permitted expenditures, but rather to purchase TurnCoin⁸ and that “these expenses were not permitted under the PPP loan program and would result in the church’s inability to seek forgiveness of the loan,” as well as that Weems “was also deceptive about the TurnCoin investments...[and]...how he showed these investments on

⁸ TurnCoin is a digital security that was brought to the attention of the Celebration Church by Cannon, who is an investor and a member of the advisory board for TheExchange, Inc. (the USA member of TurnCoin Global). Investigation of this SEC regulated digital security disclosed solid management and a platform in which it is anticipated that celebrities participating would donate part of their revenues back to charities with missions similar to the church’s missions outreach – Heart of Compassion Foundation, the Heart of Sport Foundation and the Chen Foundation.

Celebration's financial statements" and "derived a direct financial benefit from these transactions";

- (d) The "Improper Financial Transactions" section of the Defamatory Report [Id. at pp. 18-19] falsely states that the Weems's engaged in the "Fraudulent Mischaracterization and Cancellation of Honey Lake Farms Debt" and falsely accuses them of "manipulation of financial statements in connection with a loan application" and the "fraudulent manipulation of HLF's financial statements and unauthorized debt forgiveness in connection with a loan application [which] violates Florida and federal law";
- (e) The "Improper Financial Transactions" section of the Defamatory Report [Id. at p. 19] falsely states that the Weems's engaged in the "Misappropriation of Designated Funds" donated to AWKNG for an "improper and unauthorized purpose";
- (f) The "Improper Financial Transactions" section of the Defamatory Report [Id. at p.p. 19-20] falsely states that Pastor Weems "unilaterally" changed banks in early 2021, causing the revocation of the church's credit line and that Weems "deplet[ed] the church's cash reserves";
- (g) The "CONCLUSIONS" section of the Defamatory Report [Id. at p. 20] falsely states that "Stovall Weems violated the law by breaching his fiduciary duties to Celebration, committing fraud, unjustly enriching himself at the expense of the Church, and failing to meet the fiduciary duties and standards of care required by his office" and "brought Celebration to the brink of insolvency";

(h) The “RECOMMEDNATIONS” section of the Defamatory Report [Id. at p. 22] falsely states that Plaintiffs should be “require[d] to account for and return to the Church all funds misappropriated” and that that Plaintiffs should be reported “to the appropriate authorities” to determine whether “criminal charges should be brought.”

(a) The assertions that K. Weems was “distraught and overwhelmed by her husband’s behavior” and “suicidal as a result of the Encounter and Weems’s behavior following it”

104. Celebration Church’s false and defamatory statements are of and concerning K. Weems and reasonably understood to be about her, particularly given the “Recommendations” section of the Defamatory Report, which states that K. Weems should be “require[d] to account for and return to the Church all funds misappropriated” and that K. Weems should be “reported to the appropriate authorities” to determine whether “criminal charges should be brought.”

105. Celebration Church’s defamatory statements about K. Weems are false. K. Weems did not engage in any of the misconduct described in paragraph 103, above.

106. As alleged in paragraphs 42-56, Celebration Church published, caused to be published, and/or directed or encouraged others to publish the defamatory statements knowing that they were false or with reckless disregard for their truth or falsity.

107. Celebration Church’s defamatory statements are defamatory *per se* because they charged that K. Weems committed crimes and tended to injure her in her trade, business or profession.

108. In light of K. Weems's standing in the community, the nature of the statements about her, the extent to which the statements were circulated, and the tendency of the statements to injure someone such as K. Weems, Celebration Church directly and proximately caused K. Weems to suffer significant damages, including substantial reputational harm which is ongoing in nature and will be suffered in the future. K. Weems is also entitled to recover damages for the costs associated with repairing her reputation and/or correcting the defamatory statements.

109. K. Weems also suffered humiliation, mental anguish, emotional distress, and embarrassment as a direct and proximate result of Celebration Church's false and defamatory statements.

110. Re-publication of Celebration Church's false and defamatory statements in other publications, online, and through social media, caused K. Weems to suffer additional damages; all of which were foreseeable.

111. Celebration Church had actual knowledge that the false and defamatory statements about K. Weems would garner significant public and media attention, which it could use (and did use) to advance and promote its own interests and reputation.

112. Celebration Church acted knowingly, intentionally, willfully, wantonly and maliciously, with the intent to harm K. Weems, or in blatant disregard of the substantial likelihood of causing her harm.

113. As a direct and proximate result of Celebration Church's tortious conduct, K. Weems is entitled to compensatory and special damages in amounts to be proven at trial.

114. As a direct and proximate result of Celebration Church's tortious conduct, and in addition to the quantifiable monetary damages K. Weems suffered, she has suffered and will continue to suffer irreparable harm for which there is no adequate remedy at law.

115. Based upon the facts alleged herein, K. Weems has the clear legal right to the entry of an injunction prohibiting Celebration Church from publishing and republishing the defamatory statements in the Defamatory Report, Defamatory Presentation, and statement on the church's website.

116. The public interest would be served by the entry of an injunction prohibiting Celebration Church's tortious conduct.

WHEREFORE, K. Weems demands judgment against Celebration Church awarding:

- a. Compensatory and special damages in appropriate amounts to be established at trial;
- b. Injunctive relief prohibiting the publication or republication of the defamatory statements;
- c. Costs associated with this action; and
- d. Such other and further relief as the Court deems just and appropriate to protect Plaintiffs' rights and interests.

COUNT V
(DEFAMATION—K. WEEMS v. TRUSTEES)

117. K. Weems re-alleges and incorporates Paragraphs 1 through 56, as if fully stated herein.

118. The Trustees published, caused to be published, and/or encouraged or directed others to publish the following false and defamatory statements, which did expose and had the tendency to expose K. Weems to hatred, contempt, ridicule and disgrace:

- (a) The “Summary” section of the “Findings of Fact” [Defamatory Report at p. 6] falsely states that Stovall Weems “engaged in a series of improper and unauthorized financial transactions through which he personally benefitted, either directly or indirectly, at the expense of the church”;
- (b) The “Improper Financial Transactions” section of the Defamatory Report [Id. at p. 13-14 and p. 20] falsely states that the Weems’s made “material misrepresentations” to Wesleyan Investment Foundation (“WIF”) and “embezzled profit” from the sale of the 16073 Shellcracker Road;
- (c) The “Improper Financial Transactions” section of the Defamatory Report [Id. at pp. 15-18] falsely asserts that Pastor Weems did not use any of the proceeds from Celebration Church’s “Second PPP Loan” for permitted expenditures, but rather to purchase TurnCoin⁹ and that “these expenses were not permitted under the PPP loan program and would result in the church’s inability to seek forgiveness of the loan,” as well as that Weems “was also deceptive about the TurnCoin investments...[and]...how he showed these investments on Celebration’s financial statements” and “derived a direct financial benefit from these transactions”;

⁹ TurnCoin is a digital security that was brought to the attention of the Celebration Church by Cannon, who is an investor and a member of the advisory board for TheExchange, Inc. (the USA member of TurnCoin Global). Investigation of this SEC regulated digital security disclosed solid management and a platform in which it is anticipated that celebrities participating would donate part of their revenues back to charities with missions similar to the church’s missions outreach – Heart of Compassion Foundation, the Heart of Sport Foundation and the Chen Foundation.

- (d) The “Improper Financial Transactions” section of the Defamatory Report [Id. at pp. 18-19] falsely states that the Weems’s engaged in the “Fraudulent Mischaracterization and Cancellation of Honey Lake Farms Debt” and falsely accuses them of “manipulation of financial statements in connection with a loan application” and the “fraudulent manipulation of HLF’s financial statements and unauthorized debt forgiveness in connection with a loan application [which] violates Florida and federal law”;
- (e) The “Improper Financial Transactions” section of the Defamatory Report [Id. at p. 19] falsely states that the Weems’s engaged in the “Misappropriation of Designated Funds” donated to AWKNG for an “improper and unauthorized purpose”;
- (f) The “Improper Financial Transactions” section of the Defamatory Report [Id. at p.p. 19-20] falsely states that Pastor Weems “unilaterally” changed banks in early 2021, causing the revocation of the church’s credit line and that Weems “deplet[ed] the church’s cash reserves”;
- (g) The “CONCLUSIONS” section of the Defamatory Report [Id. at p. 20] falsely states that “Stovall Weems violated the law by breaching his fiduciary duties to Celebration, committing fraud, unjustly enriching himself at the expense of the Church, and failing to meet the fiduciary duties and standards of care required by his office” and “brought Celebration to the brink of insolvency”;
- (h) The “RECOMMEDNATIONS” section of the Defamatory Report [Id. at p. 22] falsely states that Plaintiffs should be “require[d] to account for and return

to the Church all funds misappropriated” and that that Plaintiffs should be reported “to the appropriate authorities” to determine whether “criminal charges should be brought.”

(a) The assertions that K. Weems was “distraught and overwhelmed by her husband’s behavior” and “suicidal as a result of the Encounter and Weems’s behavior following it”

119. The Trustees’ false and defamatory narrative and statements are of and concerning K. Weems and reasonably understood to be about her, particularly given the “Recommendations” section of the Defamatory Report, which states that K. Weems should be “require[d] to account for and return to the Church all funds misappropriated” and that K. Weems should be “reported to the appropriate authorities” to determine whether “criminal charges should be brought.”

120. The Trustee’s defamatory statements about K. Weems are false. K. Weems did not engage in any of the misconduct described in paragraph 118, above.

121. As alleged in paragraphs 42-56 the Trustees published, caused to be published, and/or encouraged or directed others to publish the defamatory statements knowing that they were false or with reckless disregard for their truth or falsity.

122. The Trustees’ defamatory statements are defamatory *per se* because they charged that K. Weems committed crimes and tended to injure her in her trade, business or profession.

123. In light of K. Weems’s standing in the community, the nature of the statements and narrative about her, the extent to which the statements were circulated, and the

tendency of the statements to injure someone such as K. Weems, the Trustees directly and proximately caused K. Weems to suffer significant damages, including substantial reputational harm which is ongoing in nature and will be suffered in the future. K. Weems is also entitled to recover damages for the costs associated with repairing her reputation and/or correcting the defamatory statements.

124. K. Weems also suffered humiliation, mental anguish, emotional distress, and embarrassment as a direct and proximate result of the Trustees' defamatory statements.

125. Re-publication of the Trustees' false and defamatory statements by other publications, online, and through social media caused K. Weems to suffer additional damages; all of which were foreseeable.

126. The Trustees had actual knowledge that their false and defamatory statements about K. Weems would garner significant public and media attention, which they could use (and did use) to advance and promote their own interest and reputations.

127. The Trustees' conduct was committed knowingly, intentionally, willfully, wantonly and maliciously, with the intent to harm K. Weems, or in blatant disregard of the substantial likelihood of causing her harm.

128. As a direct and proximate result of the Trustees' tortious conduct, K. Weems is entitled to compensatory and special damages in amounts to be proven at trial.

129. As a direct and proximate result of the Trustees' tortious conduct, and in addition to the quantifiable monetary damages she suffered, K. Weems has suffered and will continue to suffer irreparable harm for which there is no adequate remedy at law.

130. Based upon the facts alleged herein, K. Weems has the clear legal right to the entry of an injunction prohibiting the Trustees from publishing and republishing the defamatory statements described in the Defamatory Report, Defamatory Presentation, and statement on the church's website.

131. The public interest would be served by the entry of an injunction prohibiting the Trustees' tortious conduct.

WHEREFORE, K. Weems demands judgment against the Trustees, awarding:

- a. Compensatory and special damages in appropriate amounts to be established at trial;
- b. Injunctive relief prohibiting the publication or republication of the defamatory statements;
- c. Costs associated with this action; and
- d. Such other and further relief as the Court deems just and appropriate to protect Plaintiffs' rights and interests.

COUNT VI
(DEFAMATION—K. WEEMS v. WEDEKIND)

132. K. Weems re-alleges and incorporates Paragraphs 1 through 56, as if fully stated herein.

133. Wedekind created, authored, published, caused to be published, and/or encouraged or directed others to publish the following false and defamatory statements, which did expose and had the tendency to expose K. Weems to hatred, contempt, ridicule and disgrace:

- (a) The "Summary" section of the "Findings of Fact" [Defamatory Report at p. 6] falsely states that Stovall Weems "engaged in a series of improper and

unauthorized financial transactions through which he personally benefitted, either directly or indirectly, at the expense of the church”;

- (b) The “Improper Financial Transactions” section of the Defamatory Report [Id. at p. 13-14 and p. 20] falsely states that the Weems’s made “material misrepresentations” to Wesleyan Investment Foundation (“WIF”) and “embezzled profit” from the sale of the 16073 Shellcracker Road;
- (c) The “Improper Financial Transactions” section of the Defamatory Report [Id. at pp. 15-18] falsely asserts that Pastor Weems did not use any of the proceeds from Celebration Church’s “Second PPP Loan” for permitted expenditures, but rather to purchase TurnCoin¹⁰ and that “these expenses were not permitted under the PPP loan program and would result in the church’s inability to seek forgiveness of the loan,” as well as that Weems “was also deceptive about the TurnCoin investments...[and]...how he showed these investments on Celebration’s financial statements” and “derived a direct financial benefit from these transactions”;
- (d) The “Improper Financial Transactions” section of the Defamatory Report [Id. at pp. 18-19] falsely states that the Weems’s engaged in the “Fraudulent Mischaracterization and Cancellation of Honey Lake Farms Debt” and falsely

¹⁰ TurnCoin is a digital security that was brought to the attention of the Celebration Church by Cannon, who is an investor and a member of the advisory board for TheExchange, Inc. (the USA member of TurnCoin Global). Investigation of this SEC regulated digital security disclosed solid management and a platform in which it is anticipated that celebrities participating would donate part of their revenues back to charities with missions similar to the church’s missions outreach – Heart of Compassion Foundation, the Heart of Sport Foundation and the Chen Foundation.

accuses them of “manipulation of financial statements in connection with a loan application” and the “fraudulent manipulation of HLF’s financial statements and unauthorized debt forgiveness in connection with a loan application [which] violates Florida and federal law”;

- (e) The “Improper Financial Transactions” section of the Defamatory Report [Id. at p. 19] falsely states that the Weems’s engaged in the “Misappropriation of Designated Funds” donated to AWKNG for an “improper and unauthorized purpose”;
- (f) The “Improper Financial Transactions” section of the Defamatory Report [Id. at p.p. 19-20] falsely states that Pastor Weems “unilaterally” changed banks in early 2021, causing the revocation of the church’s credit line and that Weems “deplet[ed] the church’s cash reserves”;
- (g) The “CONCLUSIONS” section of the Defamatory Report [Id. at p. 20] falsely states that “Stovall Weems violated the law by breaching his fiduciary duties to Celebration, committing fraud, unjustly enriching himself at the expense of the Church, and failing to meet the fiduciary duties and standards of care required by his office” and “brought Celebration to the brink of insolvency”;
- (h) The “RECOMMEDNATIONS” section of the Defamatory Report [Id. at p. 22] falsely states that Plaintiffs should be “require[d] to account for and return to the Church all funds misappropriated” and that that Plaintiffs should be reported “to the appropriate authorities” to determine whether “criminal charges should be brought.”

(a) The assertions that K. Weems was “distraught and overwhelmed by her husband’s behavior” and “suicidal as a result of the Encounter and Weems’s behavior following it”

134. Wedekind’s defamatory statements are of and concerning K. Weems and reasonably understood to be about her, particularly given the “Recommendations” section of the Defamatory Report, which states that K. Weems should be “require[d] to account for and return to the Church all funds misappropriated” and that K. Weems should be “reported to the appropriate authorities” to determine whether “criminal charges should be brought.”

135. Wedekind’s defamatory statements about K. Weems are false. K. Weems did not engage in any of the misconduct described in paragraph 133, above.

136. As alleged in paragraphs 42-56, Wedekind created, authored, published, caused to be published, and/or encouraged or directed others to publish the defamatory statements knowing that they were false or with reckless disregard for their truth or falsity.

137. Wedekind’s defamatory statements are defamatory *per se* because they charged that K. Weems committed crimes and tended to injure her in her trade, business or profession.

138. In light of K. Weems’s standing in the community, the nature of the statements about her, the extent to which the statements were circulated, and the tendency of the statements to injure someone such as K. Weems, Wedekind directly and proximately caused K. Weems to suffer significant damages, including substantial reputational harm which is ongoing in nature and will be suffered in the future. K. Weems is also entitled to

recover damages for the costs associated with repairing her reputation and/or correcting the defamatory statements.

139. K. Weems also suffered humiliation, mental anguish, emotional distress, and embarrassment as a direct and proximate result of Wedekind's defamatory statements.

140. Re-publication of Wedekind's false and defamatory statements by Celebration Church, other publications, online, and through social media caused K. Weems to suffer additional damages; all of which were foreseeable.

141. Wedekind had actual knowledge that the false and defamatory statements about K. Weems would garner significant public and media attention.

142. Wedekind's conduct was committed knowingly, intentionally, willfully, wantonly and maliciously, with the intent to harm K. Weems, or in blatant disregard of the substantial likelihood of causing her harm.

143. As a direct and proximate result of Wedekind's misconduct, K. Weems is entitled to compensatory and special damages in amounts to be proven at trial.

144. As a direct and proximate result of Wedekind's tortious conduct, and in addition to the quantifiable monetary damages she suffered, K. Weems has suffered and will continue to suffer irreparable harm for which there is no adequate remedy at law.

145. Based upon the facts alleged herein, K. Weems has the clear legal right to the entry of an injunction prohibiting Wedekind from publishing and republishing the defamatory statements described in the Defamatory Report, Defamatory Presentation, and statement on the church's website.

146. The public interest would be served by the entry of an injunction prohibiting Wedekind's tortious conduct.

WHEREFORE, K. Weems, demands judgment against Wedekind awarding:

- a. Compensatory and special damages in appropriate amounts to be established at trial;
- b. Injunctive relief prohibiting the publication or republication of the defamatory statements;
- c. Costs associated with this action; and
- d. Such other and further relief as the Court deems just and appropriate to protect Plaintiffs' rights and interests.

COUNT VII

(CONSPIRACY TO DEFAME—PASTOR WEEMS v. ALL DEFENDANTS)

147. Pastor Weems re-alleges paragraphs 1 through 101, as if fully set forth herein.

148. Defendants agreed and conspired with one another to defame Pastor Weems.

149. In doing so, Defendants agreed and conspired to do an unlawful act or a lawful act by unlawful means.

150. Defendants committed overt acts in pursuance and furtherance of their conspiracy.

151. As a direct and proximate result, Pastor Weems suffered damages, including compensatory and special damages in amounts to be proven at trial.

152. Pastor Weems is also entitled to an injunction prohibiting the publication or republication of the defamatory narrative and statements in the Defamatory Report, Defamatory Presentation, and statement on the church's website.

WHEREFORE, Pastor Weems demands judgment against Defendants awarding:

- a. Compensatory and special damages in appropriate amounts to be established at trial;
- b. Injunctive relief prohibiting the publication or republication of the defamatory statements;
- c. Costs associated with this action; and
- d. Such other and further relief as the Court deems just and appropriate to protect Plaintiffs' rights and interests.

COUNT VIII

(CONSPIRACY TO DEFAME—K. WEEMS v. ALL DEFENDANTS)

153. K. Weems re-alleges paragraphs 1 through 56 and 102-146, as if fully set forth herein.

154. Defendants agreed and conspired with one another to defame K. Weems.

155. In doing so, Defendants agreed and conspired to do an unlawful act or a lawful act by unlawful means.

156. Defendants committed overt acts in pursuance and furtherance of their conspiracy.

157. As a direct and proximate result, K. Weems suffered damages, including compensatory and special damages in amounts to be proven at trial.

158. K. Weems is also entitled to an injunction prohibiting the publication or republication of the defamatory narrative and statements in the Defamatory Report, Defamatory Presentation, and on the church's website.

WHEREFORE, K. Weems demands judgment against Defendants awarding:

- a. Compensatory and special damages in appropriate amounts to be established at trial;
- b. Injunctive relief prohibiting the publication or republication of the defamatory statements;

- c. Costs associated with this action; and
- d. Such other and further relief as the Court deems just and appropriate to protect Plaintiffs' rights and interests.

COUNT IX

**(INVASION OF PRIVACY AND/OR AIDING AND ABETTING INVASION OF PRIVACY
—K. WEEMS v. ALL DEFENDANTS)**

159. K. Weems realleges Paragraphs 1 through 56, as though fully set forth herein.

160. Defendants, grossly invaded K. Weems' protected rights of privacy as recognized under the United States Constitution, Florida Constitution, and Florida common law by actively participating in, providing substantial assistance to and/or ratifying or approving the public disclosure and dissemination of K. Weems' private, personal information in the Defamatory Report and Defamatory Presentation, and/or acting in concert with and/or aiding and abetting one another to accomplish such public disclosure and dissemination, for their own economic gain and self-interests, and to harm K. Weems, including the use and disclosure of K. Weems's private, personal medical information and the substance of her private interactions and conversations occurring within the privacy of K. Weems's home.

161. Some of the information disclosed in the Defamatory Report about K. Weems was obtained by Gabriel Sullivan who, at the direction and/or with the approval of the Defendants, surreptitiously and illegally accessed K. Weems' private communications and marriage counseling sessions, thereafter disclosing this private information to the Trustees and/or Wedekind so that it could be published in the Defamatory Report. This reprehensible, outrageous attack on K. Weems in the Defamatory Report included disclosing the following:

Witnesses to the events at the Weems residence in the days following the Encounter describe Weems as visibly shaking and sobbing. They also confirmed that Kerri Weems was distraught and overwhelmed by her husband's behavior. Kerri Weems has a history of clinical depression, a topic which she openly discussed. People close with Kerri Weems stated that she expressed being suicidal as a result of the Encounter and Weems' behavior following it. Despite repeated requests by many, the Weemses refused to take any meaningful time off after the Encounter to process the event.

162. The unauthorized use, exploitation, disclosure and dissemination of K. Weems's private information in the Defamatory Report and Defamatory Presentation was highly offensive and objectionable to any reasonable person of ordinary sensibilities and was not of legitimate public concern.

163. Defendants knew or should have known that the information they disclosed included private and confidential information, in which K. Weems had a reasonable expectation of privacy, and that disclosure of this information in the Defamatory Report and Defamatory Presentation would reveal private and personal things which Defendants had no right or authorization to use, disseminate, disclose or exploit and would be offensive and objectionable to a reasonable person of ordinary sensibilities. The publication of these private facts constitutes a substantial violation of K. Weems' right of privacy.

164. Defendants had no reasonable or legitimate purpose for their acts of participation in and assistance provided in using, distributing, disseminating, disclosing and/or exploiting K. Weems' private information, and/or for acting in concert with, aiding and abetting other Defendants to accomplish the same. K. Weems had a reasonable expectation of privacy and had no knowledge of, and did not consent to, the recording or public disclosure of any such private activities.

165. The intimate details of K. Weems' private life that were unlawfully obtained and then used, distributed, disseminated, disclosed and/or exploited by and as a result of the actions of the Defendants were in fact published and would not have been published but for the Defendants' actions of procuring, actively participating in, providing substantial assistance for, and/or ratifying or approving the use, distribution, dissemination, disclosure, and/or exploitation of such private facts, or Defendants acting in concert with, aiding and abetting such misconduct.

166. Defendants violated K. Weems' fundamental privacy rights by the conduct alleged herein, including the intrusion into her privacy and the outrageous use, distribution, dissemination, disclosure and/or exploitation of the information, and/or acting in concert with, providing substantial assistance for, ratifying, approving, aiding, and/or abetting of the same, in an unprivileged manner calculated to financially capitalize therefrom and/or cause substantial harm to K. Weems and others, in conscious disregard of K. Weems' rights.

167. Defendants acted with actual malice and reckless disregard of K. Weems' rights.

168. As a direct and proximate result of the aforementioned acts by each of the Defendants, K. Weems has suffered economic and emotional injury, damage, loss and harm, damage to reputation, anxiety, embarrassment, humiliation, shame, and severe emotional distress in an amount subject to proof; which damages are continuing in nature and will be suffered in the future.

169. K. Weems also is entitled to permanent injunctive relief enjoining the use, distribution, dissemination and disclosure of her private information, and any portions

thereof; as well as mandating the delivery of the same and all content derived therefrom to K. Weems.

170. The aforementioned acts of the Defendants were done intentionally or with a conscious and/or reckless disregard of K. Weems' rights, and with the intent to vex, injure or annoy, such as to constitute oppression, fraud or malice.

WHEREFORE, K. Weems demands judgment against Defendants awarding:

- a. Compensatory and special damages in appropriate amounts to be established at trial;
- b. Injunctive relief prohibiting the publication or republication of her private information;
- c. Costs associated with this action; and
- d. Such other and further relief as the Court deems just and appropriate to protect Plaintiffs' rights and interests.

COUNT X
**(PUBLIC DISCLOSURE OF PRIVATE FACTS AND/OR AIDING AND
ABETTING PUBLIC DISCLOSURE OF PRIVATE FACTS—K. WEEMS v. ALL
DEFENDANTS)**

171. K. Weems realleges Paragraphs 1 through 56, as if fully set forth herein.

172. Defendants actively participated in, provided substantial assistance to and/or ratified, approved, aided and/or abetted the disclosure and dissemination of private facts about K. Weems, and/or Defendants acted in concert with, aided and abetted one another in connection with such public disclosure, for their own economic gain and self-interests and to harm K. Weems, including the public disclosure and dissemination of K. Weems' private, personal information in the Defamatory Report and Defamatory Presentation, and/or acting in concert with and/or aiding and abetting one another to accomplish such

public disclosure and dissemination, for their own economic gain and self-interests, and to harm K. Weems,.

173. The information Defendants disclosed included K. Weems's private, personal medical information and the substance of her private interactions and conversations occurring within the privacy of K. Weems's home, some of which was obtained by Gabriel Sullivan who, at the direction and/or with the approval of the Defendants, surreptitiously and illegally accessed K. Weems' private communications and marriage counseling sessions, thereafter disclosing this private information to the Trustees and/or Wedekind so that it could be published in the Defamatory Report. This reprehensible, outrageous attack on K. Weems in the Defamatory Report included disclosing the following:

Witnesses to the events at the Weems residence in the days following the Encounter describe Weems as visibly shaking and sobbing. They also confirmed that Kerri Weems was distraught and overwhelmed by her husband's behavior. Kerri Weems has a history of clinical depression, a topic which she openly discussed. People close with Kerri Weems stated that she expressed being suicidal as a result of the Encounter and Weems' behavior following it. Despite repeated requests by many, the Weemses refused to take any meaningful time off after the Encounter to process the event.

174. The unauthorized use, exploitation, disclosure and dissemination of K. Weems's private information in the Defamatory Report and Defamatory Presentation was highly offensive and objectionable to any reasonable person of ordinary sensibilities and was not of legitimate public concern.

175. Defendants knew or should have known that they disclosed private and confidential information about K. Weems in which she had a reasonable expectation of privacy and were reveling private and personal things about K. Weems which said

Defendants had no right or authorization to use, disseminate, disclose or exploit that would be offensive and objectionable to a reasonable person of ordinary sensibilities. The publication of these private facts constitutes a substantial violation of K. Weems' right of privacy.

176. Defendants had no reasonable or legitimate purpose for their acts of participation in and assistance provided in using, distributing, disseminating, disclosing and/or exploiting the private information and/or for acting in concert with, aiding, and abetting other Defendants in committing these acts. K. Weems had a reasonable expectation of privacy and had no knowledge of, and did not consent to, the disclosure of any such private information.

177. Private facts about K. Weems were unlawfully obtained, and then used, distributed, disseminated, disclosed and/or exploited by and as a result of the actions of the Defendants were in fact published, and would not have been published but for Defendants' actions of procuring, actively participating in, providing substantial assistance for and/or ratifying or approving the use, distribution, dissemination, disclosure and/or exploitation of such private facts, or Defendants' actions in concert with, or acts of aiding and abetting such misconduct.

178. The actions of the Defendants as alleged herein are highly offensive and objectionable to any reasonable person of ordinary sensibilities and are not of legitimate public concern. K. Weems did not consent to nor authorize any use, distribution, dissemination, disclosure or exploitation of the private information, whatsoever, or of the publication of same by anyone.

179. Defendants violated K. Weems' fundamental privacy rights by the conduct alleged herein, including the intrusion into her privacy and the outrageous use, distribution, dissemination, disclosure and/or exploitation of the private facts, and/or acting in concert, providing substantial assistance for, ratifying, approving, aiding and/or abetting of same, in an unprivileged manner calculated to financially capitalize therefrom and/or cause substantial harm to K. Weems and others, in conscious disregard of her rights.

180. Defendants acted with actual malice and reckless disregard for K. Weems' rights.

181. As a direct and proximate result of the aforementioned acts by each of the Defendants, K. Weems has suffered economic and emotional injury, damage, loss and harm, damage to reputation, anxiety, embarrassment, humiliation, shame and severe emotional distress in an amount subject to proof; which damages are continuing in nature and will be suffered in the future.

182. K. Weems also is entitled to permanent injunctive relief enjoining the use, distribution, dissemination and disclosure of the private information, and any portions thereof; and mandating the delivery of all originals, reproductions, copies, and portions of the same and all content derived therefrom to K. Weems.

183. The aforementioned acts of Defendants were done intentionally or with a conscious and/or reckless disregard of K. Weems' rights, and with the intent to vex, injure or annoy, such as to constitute oppression, fraud or malice.

WHEREFORE, K. Weems demands judgment against Defendants awarding:

- a. Compensatory and special damages in appropriate amounts to be established at trial;

- b. Injunctive relief prohibiting the publication or republication of her private information;
- c. Costs associated with this action; and
- d. Such other and further relief as the Court deems just and appropriate to protect Plaintiffs' rights and interests.

COUNT XI
(INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS—K. WEEMS v. ALL DEFENDANTS)

184. K. Weems realleges paragraphs 1 through 56, as if fully set forth herein.

185. Defendants acted intentionally, maliciously and without justification, actively participated in, provided substantial assistance to, and/or ratified or approved misconduct that caused K. Weems' private information to be publicly disseminated and disclosed to third parties, and/or by acting in concert with, aiding and abetting in such activities, when Defendants knew or should have known that K. Weems would suffer severe emotional distress as a result.

186. Defendants' disclosure of K. Weems's private, personal medical information and the substance of her private interactions and conversations occurring within the privacy of K. Weems's home and procurement of such information by surreptitiously and illegally accessing K. Weems' private communications and marriage counseling sessions and thereafter disclosing this private information is reprehensible and outrageous

187. The assertions that K. Weems was "distraught and overwhelmed by her husband's behavior" and "suicidal as a result of the Encounter and Weems's behavior following it"

are not only false, but a clear violation of her privacy because they disclose information based on statements from supposed witnesses with non-disclosure agreements who only could have obtained this information from K. Weems's private interactions and conversations in a private setting (*i.e.*, her home).

188. Moreover, the disclosures of such information within the context of a "report" falsely accusing K. Weems of crimes and referring her for criminal prosecution, at a time when Defendants knew K. Weems was particularly emotionally vulnerable goes beyond all bounds of decency in a civilized society.

189. At the time the Defamatory Report was created, leaked to the press, and published to the general public and others, Defendants were aware that K. Weems is especially sensitive, susceptible, and/or vulnerable to injury caused by mental distress. Thus, their tortious acts were undertaken despite knowledge of K. Weems's emotional vulnerability and are particularly heartless, flagrant, and outrageous.

190. Defendants acts were also committed with a heightened degree of outrageousness because Defendants asserted and abused a position of power, apparent or actual, to damage K. Weems.

191. Defendants' conduct was intentional and malicious and done for the purpose of causing or was known by Defendants to be likely to cause K. Weems to suffer humiliation, mental anguish and severe emotional distress, and was done with the wanton and reckless disregard of the consequences to K. Weems.

192. In committing these acts, Defendants acted outrageously and beyond all reasonable bounds of decency, and intentionally inflicted severe emotional distress upon K. Weems, to her detriment.

193. Defendants acted with actual malice and reckless disregard of K. Weems' rights.

194. As a direct and proximate result of the aforementioned acts by each of the Defendants, K. Weems has suffered emotional injury, damage, loss, harm, anxiety, embarrassment, humiliation, shame, and severe emotional distress in an amount subject to proof; which damages are continuing in nature and will be suffered in the future.

195. The aforementioned acts of the Defendants were done intentionally or with a conscious and/or reckless disregard of K. Weems' rights, and with the intent to vex, injure or annoy, such as to constitute oppression, fraud or malice.

WHEREFORE, K. Weems demands judgment against Defendants awarding:

- a. Compensatory and special damages in appropriate amounts to be established at trial;
- b. Injunctive relief prohibiting the publication or republication of her private information;
- c. Costs associated with this action; and
- d. Such other and further relief as the Court deems just and appropriate to protect Plaintiffs' rights and interests.

COUNT XII

(CONSPIRACY TO INVADE PRIVACY—K. WEEMS v. ALL DEFENDANTS)

196. K. Weems realleges Paragraphs 1 through 56 and 159 through 183, as if fully set forth herein.

197. Defendants entered into an agreement or agreements with one another as part of an ongoing scheme to commit an unlawful act or acts and/or perform lawful act(s) by unlawful means.

198. Defendants, as more specifically set forth above, each performed overt acts in pursuance of their conspiracy.

199. As a direct and proximate result of Defendants' acts, K. Weems suffered substantial economic and emotional injury, damage, loss and harm, anxiety, embarrassment, humiliation, shame, damage to reputation, severe emotional distress, in an amount subject to proof; which damages are continuing in nature and will be suffered in the future.

WHEREFORE, K. Weems demands judgment against Defendants awarding:

- a. Compensatory and special damages in appropriate amounts to be established at trial;
- b. Injunctive relief prohibiting the publication or republication of her personal information;
- c. Costs associated with this action; and
- d. Such other and further relief as the Court deems just and appropriate to protect Plaintiffs' rights and interests.

DEMAND FOR JURY TRIAL

Plaintiffs hereby demand a trial by jury on all issues so triable.

Respectfully submitted,

/s/ Shane B. Vogt

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 18th day of October, 2022, I caused a true and correct copy of the foregoing to be served via the Florida Court's E-Filing Portal upon the following counsel of record:

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