

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT

IN AND FOR PINELLAS COUNTY, FLORIDA

CIVIL DIVISION

UCN: 522025CA003989XXCICI

TRAVESS MATTHEW WOLFORD,

Plaintiff,

v.

RANDALL MICHAEL McWHORTER, a/k/a “TizzyEnt”; and

MICHAEL SHAWN TENENBLATT, a/k/a “Floridian Druid”;

DIGIVERSETECH LLC,

Defendants.

Case No.: 25-003989-CI

FIRST AMENDED COMPLAINT

(Filed as a Matter of Course Pursuant to Fla. R. Civ. P. 1.190(a))

Plaintiff, Travess Matthew Wolford (“Plaintiff”), Pro Se, files this First Amended Complaint against Defendants Michael Shawn Tenenblatt (“Defendant Tenenblatt”), Randall Michael

McWhorter (“Defendant McWhorter”), and Digiversetech LLC (“Defendant Digiversetech LLC”), and alleges as follows:

I. PARTIES

1. Plaintiff Travess Matthew Welford is a natural person residing in St. Petersburg, Pinellas County, Florida.
2. Defendant Randall Michael McWhorter is a natural person residing in Melbourne, Florida.
3. Defendant Michael Shawn Tenenblatt is a natural person residing in Ruskin, Florida.
4. Defendant Digiversetech LLC is a limited liability company organized under the laws of the State of Michigan.
5. Defendant McWhorter operates multiple social-media accounts under the name “TizzyEnt.”
6. Defendant Tenenblatt operates a public TikTok account under the username “Floridian Druid.”
7. Defendant Digiversetech LLC administers the “TizzyEnt” Facebook.

II. JURISDICTION AND VENUE

8. The amount in controversy exceeds \$50,000, exclusive of interest and costs.
9. Each Defendant engaged in a course of repeated online contact with Plaintiff through publicly accessible social-media platforms. That course of contact consisted of videos and posts that identified Plaintiff by name, city, and employment information, contained statements concerning him, and invited additional public communications directed to him.
10. Plaintiff experienced the resulting contact and its effects in Pinellas County, Florida, where he resides.
11. On June 14, 2025, Defendant Randall Michael McWhorter created a video that identified Plaintiff by name and referenced Plaintiff's city. The video included the statement "*If any incidents happen in St. Petersburg, Florida, Travess Matthew Wolford might be someone you want to look at about that.*" Defendant McWhorter first published that video to his TikTok account and then republished the same video to his other social-media accounts, including Instagram, X, and YouTube. The video appeared on at least four platforms and contained statements about Plaintiff as well as statements directed to Plaintiff.
12. Defendant Michael Shawn Tenenblatt published four distinct videos concerning Plaintiff on his TikTok account. The first video, published on June 15, 2025, contained a direct tag

of Plaintiff's username and included the statement *"I think all the people of Tampa Bay, liberal or not, should know the person that's being hired to build their buildings would gleefully run them over with a car and then post about it online to brag about it."* That video incorporated materials taken from Plaintiff's employer's website and included statements both about Plaintiff and directed to him. The second video was published on June 17, 2025. The third video, published on June 18, 2025, also contained statements both about and directed to Plaintiff. The fourth video was published on June 30, 2025. Each video contained distinct editorial features and scripts.

13. Defendant Digiversetech LLC, a Michigan limited-liability company, republished the video created by Defendant McWhorter on the "TizzyEnt" Facebook page that it administers. The identical video contained the statements *"If any incidents happen in St. Petersburg, Florida, Travess Matthew Welford might be someone you want to look at about that."*

14. Venue is proper in Pinellas County, Florida, because the conduct described above was directed toward a resident of this county and the resulting effects occurred here.

III. GENERAL ALLEGATIONS (as to Defendant Randall Michael McWhorter)

15. On June 14, 2025, Defendant McWhorter, operating under the name "TizzyEnt," published a video on his TikTok account located at <https://www.tiktok.com/@tizzyent/video/7515875850126986526> identifying Plaintiff

Travess Matthew Wolford. The video contained false statements about Plaintiff and a direct threat to Plaintiff. The video included the following statements made by Defendant McWhorter:

“Cool story, bro. Here’s the thing. Even setting aside the fact that I don’t think that Ron DeSantis’ little mandate holds up under real-world conditions, within his mandate, the scenario has to be like you’re driving, you’re surrounded by people, you feel unsafe, and have to drive away. And your little video here eliminates that. This indicates premeditation. Seems to indicate that this is something that you want to do and might seek out doing. So, if you want to try and do that, you can go ahead and fucking throw your life away. I’d be okay with that part. But hey, just in case there are any incidents in or around St. Petersburg, Florida, Travess Matthew Wolford might be someone that you want to look at about that. And now for the public service announcement portion of this. I only saw your video, Travess, because your dumbass follows me. And the algorithm went, maybe you want to see this because this person follows you, so maybe you’ll like them. I don’t. But here you are. So, if you don’t like me, don’t hate-follow me, because if you’re going to have stupid fucking shitty takes like this, I’m going to make it real, real, real public for you.”

16. Defendant McWhorter republished the identical video to his Instagram account, available at <https://www.instagram.com/p/DK5H35sOFAx/>. The video was identical in content and contained the same false statements and direct threat directed toward Plaintiff. The post was contemporaneously “liked” by Dave Bautista, a high-profile celebrity, former professional wrestler, and internationally recognized actor best known for his role as

Drax the Destroyer in Marvel Studios' *Guardians of the Galaxy* and *Avengers* film franchises. Bautista has also appeared in *Blade Runner 2049* (██████ *Dune* (2021), and *Knock at the Cabin* (2023). His verified Instagram account, @davebautista, has millions of followers, reflecting his substantial cultural influence and public reach.

17. Defendant McWhorter republished the identical video to his X account located at <https://x.com/TizzyEnt/status/1933966434595487963>. The video was identical in content and contained identical statements, including false statements about Plaintiff and a direct threat to Plaintiff.

18. Defendant McWhorter republished the identical video to his YouTube account located at <https://www.youtube.com/shorts/x81pzSveE80>. The video was identical in content and contained identical statements, including false statements about Plaintiff and a direct threat to Plaintiff.

IV. GENERAL ALLEGATIONS (as to Defendant Michael Shawn Tenenblatt)

19. On June 15, 2025, Defendant Tenenblatt published a video on his TikTok account located at https://www.tiktok.com/@floridian_druid/video/7516150662623710494. The video contained false statements about Plaintiff and direct unwanted communications to Plaintiff, including the statement “*Travess, you messed up,*” a statement directed to Plaintiff spoken in second person, following a series of false statements about him. Within the same video, the caption featured another direct communication to Plaintiff,

which was unwanted, in the form of a direct tag of his account, reading “Heeeyyyyyy @Outrage_Admin enjoy! :) #leftist #fyp #progressive #florida #tampa #protests #protest.” as of the date of this filing this video has accumulated approximately 1.5 million views.

20. On June 17, 2025, Defendant Tenenblatt published a second video on his TikTok account located at https://www.tiktok.com/@floridian_druid/video/7517038414999457054. In the video Defendant Tenenblatt credited joint action between his own post and Defendant Randall Michael McWhorter’s post for temporarily causing Plaintiff to leave TikTok, stating “Between Tizzy’s post and my post he’s gone.” The video bore the caption “Cheers to another mission accomplished! #leftist #fyp #progressive #protests #protest #florida #tampa #greenscreen.” The video contained false statements about Plaintiff. Per Defendant Tenenblatt's own caption, and words, the video acted as an “update” about Plaintiff following a purported “mission” that had been accomplished.

21. On June 18, 2025, Defendant Tenenblatt published a third video on his TikTok account located at https://www.tiktok.com/@floridian_druid/video/7517279436475993374. The video contained false statements about Plaintiff and direct unwanted communications to Plaintiff and included the caption “Travess thinks being held accountable for his words makes him a victim. #leftist #fyp #progressive #protest #florida #tampa.” This video contained a direct accusation that Plaintiff had committed a crime.

22. On June 30, 2025, Defendant Tenenblatt published a fourth video on his TikTok account located at https://www.tiktok.com/@floridian_druid/video/7521722074113608990. The video contained a series of references to Adam Sandler films that linked those references to Plaintiff's employment and litigation status and included comments suggesting that Plaintiff needed therapy. The caption read *"The Temu Adam Sandler saga is one for the history books! Just trying to help the guy out getting the exposure and attention he desperately wants. #capcut #fyp #progressive #leftist #protest #florida #tampa."* The video contained false statements about Plaintiff, including that he was having a "Low budget Temu Adam Sandler meltdown".

V. GENERAL ALLEGATIONS (as to Defendant Digiversetech LLC)

23. On June 16, 2025, Defendant Digiversetech LLC published to the "TizzyEnt" Facebook account the identical video created by Defendant Randall Michael McWhorter, located at <https://www.facebook.com/share/v/1Z6VmzAyMV/>. The video was identical in content to those previously published by Defendant McWhorter and contained false statements about Plaintiff followed by a direct threat to Plaintiff.

VI. STATEMENT OF FACTS REGARDING DEFENDANT RANDALL MICHAEL McWHORTER

24. Defendant Randall Michael McWhorter is an experienced media professional who identifies himself publicly as a writer, director, editor, and producer operating under "L7

Pictures.” He has more than fourteen years of editing and production experience, including approximately eight years as post-production manager at Rhino Studios in Miami, Florida, where he worked on films, trailers, music videos, commercials, and corporate projects. He lists professional skills including visual-effects compositing, color grading, sound design, narration, title overlays, and broadcast mastering, and he has identified himself as the director and editor of the feature film “Warning Shot.”

- 25.** Defendant McWhorter operates under the online persona “TizzyEnt” across multiple public social-media accounts, including TikTok, Instagram, X (Twitter), YouTube, Bluesky. His TikTok account @tizzyent is verified and displays an audience of approximately 7.8 million followers. His Instagram account is verified, displays an audience in the millions including high profile celebrities such as Dave Bautista, Alan Ritchson, and Mandy More. Defendant McWhorter's Instagram account includes direct links to payment services and merchandise storefronts. His X account is verified and displays hundreds of thousands of followers. His YouTube channel is verified, contains hundreds of published videos, and is enrolled in YouTube’s monetization program. He uses a Linktree profile to connect these accounts and to direct viewers between his social-media platforms and commercial outlets.
- 26.** On June 14, 2025, Defendant Randall Michael McWhorter created and published a video identifying Plaintiff by full name, “*Travess Matthew Welford,*” and referencing Plaintiff’s city, St. Petersburg, Florida. The original publication is located at <https://www.tiktok.com/@tizzyent/video/7515875850126986526>. The video has a total

runtime of approximately one minute and twenty-four seconds.

27. Prior to creating the video, Defendant McWhorter viewed and “favorited” Plaintiff’s original TikTok video. The “favorite” feature allows a user to bookmark a video for later access and use. Plaintiff observed that Defendant McWhorter’s account had favorited the video before Defendant McWhorter published his own stitched version.
28. Plaintiff’s TikTok account did not contain his name, geographic location, or employment information. To identify Plaintiff, Defendant McWhorter conducted independent research outside of TikTok, locating Plaintiff’s name and other personal information through off-platform investigation.
29. Defendant McWhorter obtained an image of Plaintiff and Plaintiff’s dog from Plaintiff’s separate Instagram account. That image was not posted on TikTok. Defendant McWhorter later inserted this image into his June 14 video as part of his editing process. That image has been the subject of a significant number of documented responses to Defendant McWhorter’s video about Plaintiff, with several users commenting on Plaintiff’s dog.
30. To produce the June 14 video, Defendant McWhorter used TikTok’s “stitch” feature, which appends a new recording directly after another user’s full video. Executing a stitch requires selecting the “Stitch” command, recording a new segment, and confirming

synchronization through TikTok's in-app editor.

31. Seconds 0 through 9 of the video consist of Plaintiff's entire original TikTok video. In that segment, Plaintiff is seen and heard stating, *"Hey liberals, guess what, I'm in Florida, and if one of your dumbass protests gets in the road and tries to stop me from going somewhere, the law lets me plow right through ya."* Above Plaintiff's head, yellow text appears reading *"stitch incoming."* Adding this text required Defendant McWhorter to open TikTok's text tool, type the phrase, select yellow from the color palette, choose a font, and position the text box at the top of the frame.

32. From seconds 9 through 49, Defendant McWhorter appears on screen wearing a shirt labeled *"Right Over Wrong."* That shirt is sold in his Spring merchandise store for \$25.99 and the video contains no visible disclosure that the shirt being worn in the video is a monetized product that Defendant McWhorter sells. The background during this segment shows the interior of what appears to be a residential setting. Animated captions display each word of his speech in real time. His spoken and synchronized on-screen words were:

"Cool story, bro. Here's the thing. Even setting aside the fact that I don't think that Ron DeSantis' little mandate holds up under real-world conditions, within his mandate, the scenario has to be like you're driving, you're surrounded by people, you feel unsafe, and have to drive away. And your little video here eliminates that. This indicates premeditation. Seems to indicate

that this is something that you want to do and might seek out doing. So, if you want to try and do that, you can go ahead and fucking throw your life away. I'd be okay with that part."

33. At approximately second 49, Defendant McWhorter manually changed the background to the image he had obtained from Plaintiff's Instagram account depicting Plaintiff and Plaintiff's dog. This required using TikTok's "green-screen" effect, selecting the imported image from his device gallery, and positioning himself in the foreground. He timed the change so that the image appeared exactly as he began saying *"But hey, just in case there are any incidents in or around St. Petersburg, Florida, Travess Matthew Wolford might be someone that you want to look at about that."* Animated text again appeared concurrently with his speech.

34. From approximately minute 1:00 through 1:24, Defendant McWhorter changed the background again using the "green-screen" effect to display a screenshot of Plaintiff's TikTok account. This required importing a captured image of Plaintiff's profile and layering it behind his video feed. The narration, again mirrored by animated on-screen text, was:

"And now for the public service announcement portion of this. I only saw your video, Travess, because your dumbass follows me. And the algorithm went, maybe you want to see this because this person follows you, so maybe you'll like them. I don't. But here you are. So, if you don't like me, don't hate-follow me, because if you're going to have stupid fucking shitty takes like this, I'm going to make it real, real, real public for you."

35. Completion of these steps required Defendant McWhorter to preview the video, confirm synchronization of captions and overlays, and select TikTok's "Post" command, publishing it to his account feed.

36. On June 14, 2025, Defendant McWhorter republished the identical video to his verified Instagram account located at <https://www.instagram.com/p/DK5H35sOFAX/>. Uploading a TikTok video to Instagram required saving the completed file, opening Instagram Reels, selecting the file from his device, adding a caption, and pressing "Share."

37. On June 14, 2025, Defendant McWhorter republished the identical video to his verified X account located at <https://x.com/TizzyEnt/status/1933966434595487963>. Posting a video to X required saving the video file, opening the platform, composing a post, attaching the file, and clicking "Post."

38. On June 14, 2025, Defendant McWhorter republished the identical video to his verified YouTube channel located at <https://www.youtube.com/shorts/x81pzSveE80>. Uploading to YouTube Shorts required logging into the account, selecting the Shorts upload option, choosing the file, and confirming publication.

39. Each publication described above involved separate manual actions and the intentional decision to republish the identical file on a new platform.

40. Each version of the video contained identical visuals, audio, and on-screen text, including Defendant McWhorter's statements naming Plaintiff and identifying his location.
41. Each segment of the original TikTok video was timed so that Defendant McWhorter's spoken words and visual changes occurred sequentially: Plaintiff's entire video, Defendant McWhorter's first segment, the appearance of Plaintiff's image, and the concluding background of Plaintiff's TikTok profile.
42. The TikTok editing interface required Defendant McWhorter to confirm each overlay, background change, and caption timing before the platform would render the final composite, showing that the video was assembled and posted through deliberate sequential steps.
43. The video and all subsequent republications remain publicly accessible on Defendant McWhorter's TikTok, Instagram, X, and YouTube accounts.

CAUSE OF ACTION FOR CYBERSTALKING UNDER FLORIDA STATUTES § 784.048(1)(d) AND § 784.0485 AGAINST DEFENDANT RANDALL MICHAEL McWHORTER FOR HIS WILLFUL AND MALICIOUS ONLINE CONDUCT

Under Florida law (§ 784.048(1)(d), § 784.0485, Fla. Stat.), cyberstalking is defined as a willful, malicious, and repeated course of conduct involving electronic communications directed at a specific person, serving no legitimate purpose and causing substantial emotional distress.

Defendant Randall Michael McWhorter's actions meet and exceed that definition. They also implicate a broader civil-rights dimension: a coordinated effort to silence lawful expression and punish a citizen for exercising his constitutional right to speak on matters of public concern.

Defendant McWhorter operates a verified network of multi-platform accounts—TikTok, Instagram, X, and YouTube—reaching millions. He understands precisely how to mobilize that audience. When he declared, *“If you’re going to have stupid fucking shitty takes like this, I’m going to make it real, real, real public for you,”* he was not engaging in dialogue; he was issuing a digital threat designed to coerce the Plaintiff into silence. The statement was both a promise and a directive, activating the public Defendant McWhorter referred to—an audience conditioned by his prior conduct to attack, humiliate, and economically damage those he targets.

Plaintiff has extensively documented the mechanics of this platform and the predictable coordination that follows McWhorter's publications. Each time he features an individual, the same pattern unfolds: waves of users contact employers, post defamatory content, and deliver threats of physical violence. The evidence shows that this behavior is not spontaneous; it is the functional design of McWhorter's operation, an extension of his own intent. By exploiting algorithmic visibility and crowd psychology, he has created a privately controlled enforcement apparatus capable of suppressing dissent through fear. The chilling effect is the point.

McWhorter executed this plan with deliberate repetition. He took one video naming Plaintiff by full name, city, and alleged criminal disposition and replicated it across four platforms. Each upload was a separate act of willful contact and a new vector of intimidation. The resulting harassment was immediate and measurable—hundreds of comments, direct threats, and employer contacts, continuing despite dozens of cease-and-desist warnings. These acts were not

random; they were the foreseeable and intended consequence of McWhorter's broadcast and the conduct of the public he weaponized.

Defendant Michael Shawn Tenenblatt later entered this same dynamic, openly acknowledging that his videos about Plaintiff operated "*between Tizzy's post and my post.*" His participation confirms the continuity of design: he joined and advanced the same coordinated campaign of intimidation. Tenenblatt's "*Temu Adam Sandler*" videos and taunting updates were not independent commentaries but further transmissions within the same unlawful course of conduct that McWhorter initiated.

Together, these acts amount to more than defamation or harassment. They constitute a privately organized system of retaliation against protected speech—a digital mob deployed to impose viewpoint conformity by fear of exposure. McWhorter's threat to "*make it public*" weaponized his influence to punish a citizen for expressing a personal opinion a state law. In doing so, he infringed the Plaintiff's right to speak freely without intimidation, coercion, or the reasonable fear of violent reprisal.

Defendant McWhorter's cyberstalking campaign served no legitimate purpose, advanced no civic discourse, and was executed for personal profit and ideological punishment. It converted lawful expression into grounds for public persecution and monetized the violation of another's civil liberty. Each republication renewed the coercion, and each follower who acted upon it extended his reach. The Defendant's conduct thus represents a modern form of mob intimidation—one that uses digital tools instead of physical ones, but whose purpose is the same: to silence speech through fear.

Through these deliberate acts, Defendant McWhorter engineered a continuing violation of the Plaintiff's right to speak freely and live without targeted harassment. His conduct was willful, malicious, and without lawful justification, constituting cyberstalking under Florida law and a calculated assault on the Plaintiff's civil rights to expression, safety, and personal dignity.

**DEFENDANT RANDALL MICHAEL MCWHORTER'S KNOWINGLY FALSE
STATEMENTS IMPUTING CRIMINALITY AND MORAL CORRUPTION
CONSTITUTE DEFAMATION PER SE UNDER FLORIDA LAW**

Under Florida law, words that falsely impute the commission of a crime, the possession of a felonious state of mind, or conduct incompatible with professional competence constitute defamation per se, and damages are presumed. Yet here, those damages are not merely presumed—they are documented through a vast and growing body of evidentiary material that captures the ongoing contamination of Plaintiff's name and reputation. Defendant Randall Michael McWhorter's false assertion that Plaintiff's lawful speech "*indicates premeditation*" has metastasized across digital platforms, functioning as an indelible watermark of defamation—a conspiratorial infection replicating in comment threads, hashtags, and derivative content like outgrowths of a malignant digital cancer.

McWhorter's words were not satire or casual insults; they were a false criminal indictment broadcast to millions. By declaring, "*This indicates premeditation. Seems to indicate that this is something that you want to do and might seek out doing. So, if you want to try and do that, you can go ahead and fucking throw your life away,*" Defendant McWhorter assigned to Plaintiff the mental state of a murderer—the deliberate and willful intent to take life. In Florida jurisprudence,

the term *premeditation* is synonymous with *first-degree murder*. When spoken of a named person, it imputes a specific, deliberate homicidal intent and is therefore defamation per se, because it accuses the individual of the most serious criminality known to law.

The accusation did not end with words. McWhorter paired the spoken term “*premeditation*” with Plaintiff’s image, imported from a separate social media account, using a green-screen overlay to ensure that the accusation was visually and psychologically linked to Plaintiff’s identity. He then compounded the falsehood by saying, “*Just in case there are any incidents in or around St. Petersburg, Florida, Travess Matthew Wolford might be someone that you want to look at about that.*” The fusion of those words with Plaintiff’s image transformed the video into a simulated police briefing, falsely positioning Plaintiff as a *person of interest* in imaginary “*incidents*” in his own community. This was not opinion; it was an act of digital character assassination.

McWhorter’s threat to “*make it real, real, real public for you*” was both a promise and a weapon. It made clear that he intended to use his millions of followers as a bludgeon to enforce humiliation and to drive engagement through outrage. This was not speech of public concern—it was defamation as content strategy, moral posturing sold as entertainment. McWhorter, wearing his own “*Right Over Wrong*” shirt—merchandise he sells for \$25.99 on his Spring store, promoted without required FTC disclosure—stood as self-anointed arbiter of good and evil while monetizing the destruction of another’s reputation.

The consequences of this calculated defamation were not abstract—they are empirically verifiable and voluminously documented. The “*premeditation*” lie functions as a digital stain that continues to replicate itself across platforms. In the comment sections beneath McWhorter’s

own publications, beneath those of Defendant Tenenblatt, and within independent user threads, the word “*premeditation*” appears repeatedly—verbatim and unaltered—used as shorthand for Plaintiff’s name. This repetition confirms that Defendant McWhorter’s lie did not merely defame; it engineered a narrative architecture of accusation that has taken on a life of its own. Each reappearance of the term “*premeditation*” in these threads is a direct progeny of McWhorter’s original falsehood, a traceable echo of his defamatory act.

In one thread after another, strangers—having never met Plaintiff—invoke “*premeditation*” as though it were a proven fact, embedding it into memes, replies, and jokes. This digital pattern forms a body of evidence that behaves like a forensic record: a map of contamination spreading outward from the original publication. McWhorter’s statement has become the defining public association with Plaintiff’s name—a modern-day scarlet letter constructed through algorithmic amplification and viral defamation.

Under Florida law, damages are presumed for defamation per se because injury to reputation is the natural and inevitable result of accusing a person of crime or moral corruption. Yet in this case, those damages are not confined to presumption—they are proven, visible, and ongoing. Screenshots, analytics, and archived comment threads show the exponential replication of McWhorter’s falsehood, the entrenchment of his “*premeditation*” narrative, and the permanent alignment of Plaintiff’s identity with violent criminality in the public eye.

Defendant McWhorter’s conduct therefore satisfies and exceeds every element of defamation per se. He falsely attributed to Plaintiff a homicidal mindset, portrayed him as a suspect in potential crimes, attacked his moral and professional standing, and leveraged those lies for personal financial gain. His defamatory narrative continues to reproduce itself through every algorithmic

pathway, transforming Plaintiff's name into a digital crime scene. The law presumes damages for such defamation—but the evidence here documents them in detail. Defendant McWhorter's falsehood is not only a legal injury—it is a living, self-replicating act of reputational destruction that will continue to echo unless remedied by judicial intervention.

**DEFENDANT RANDALL MICHAEL MCWHORTER'S ONLINE REPRESENTATIONS
WHICH MISLEAD VIEWERS ABOUT PLAINTIFF'S CHARACTER FORM A CAUSE
OF ACTION FOR DEFAMATION BY IMPLICATION UNDER FLORIDA LAW**

Defendant McWhorter did not simply utter an isolated insult; he constructed an implied narrative of criminality by layering tone, political mischaracterization, and synchronized imagery to create a false and dangerous inference about Plaintiff. He opened with “*Cool story, bro,*” a rhetorical dismissal designed to strip Plaintiff's words of credibility and to signal to viewers that what follows is not debate but condemnation. The casual contempt of that opening line is material: it primes the audience to treat Plaintiff's speech as frivolous, reckless, and unworthy of the ordinary protections of fair comment. Against that background of derision, Defendant then reframed Plaintiff's lawful speech as something else entirely — calling it a product of a “*little mandate*” rather than the real statutory and contested legal context in which Plaintiff was speaking. By minimizing and mischaracterizing the legal framework, Defendant substituted mockery for analysis and, in doing so, converted a policy debate into an insinuation of moral and criminal deficiency.

The false implication was sharpened into an accusation by the declarative statement, “*This indicates premeditation.*” Detached from nuance or evidentiary predicate, that phrase does not

operate as opinion or analogy; it functions as the predicate of criminal mens rea. In the mouths of ordinary listeners and in the architecture of the internet, *premeditation* is a label that carries the weight of an accusation—selection of victim, forethought, and culpable intent. McWhorter’s assertion therefore did not merely criticize; it imputed a criminal state of mind to Plaintiff by implication.

That verbal implication was then married to an unmistakable visual cue: as McWhorter invoked the hypothetical “*incidents in or around St. Petersburg, Florida,*” he simultaneously green-screened an off-platform photograph of Plaintiff and Plaintiff’s dog. The synchronous pairing of spoken “*incident*” language and the sudden appearance of Plaintiff’s personal image converted abstract suggestion into concrete identification. In the practiced grammar of media and police reporting, the word “*incident*” summons images of active crime scenes, emergency lights, and persons-of-interest. By inserting Plaintiff’s face and private family image at the exact moment he suggested that authorities might “*look at*” Plaintiff in connection with future incidents, Defendant created a powerful, false inference: that Plaintiff is a likely perpetrator or suspect in violent events. This is classic defamation by implication—an inculcation of criminality through juxtaposition and omission rather than through an explicit, literal charge.

The implied accusation was further cemented by the conditional, extortionate coda—“*if you’re going to have stupid fucking shitty takes like this, I’m going to make it real, real, real public for you.*” That promise operates as more than rhetorical flourish: it is an announced program of public exposure tied directly to Plaintiff’s future lawful expression. The threat transforms the implied accusation into a tool of coercion; by promising to amplify and weaponize the defamatory implication, Defendant sought to silence Plaintiff and to enlist his audience in the enforcement of that silence. The filmic editing choices—the stitch that forces viewers to see

Plaintiff's original video immediately before McWhorter's denunciation, the timed animated captions, the green-screen insertions—intensified the inference and ensured that the false implication would be both memorable and repeatable across comment threads and republications.

Taken together, these elements demonstrate a deliberate course of conduct to imply criminality where none existed: rhetorical dismissal to discredit, legal minimization to recast context, a declarative label conveying mens rea, and synchronized imagery to identify the person so labeled. Each editorial decision was a step in a narrative calculus whose foreseeable effect was the creation and propagation of a false impression of criminal culpability. Under Florida law, such a communication—where the speaker's words, the surrounding context, and the accompanying visuals imply undisclosed defamatory facts—gives rise to a cause of action for defamation by implication. The harm here is plain: the video endorsed a false and ominous narrative tying Plaintiff to violent wrongdoing, seeded that narrative with a public threat of amplification, and thereby exposed Plaintiff to foreseeable reputational ruin, employment interference, emotional distress, and targeted harassment. The Defendant's conduct was not protected commentary; it was the manufacture and dissemination of a defamatory implication that is actionable under Florida law.

**FLORIDA LAW RECOGNIZES A CAUSE OF ACTION FOR TORTIOUS
INTERFERENCE ARISING FROM DEFENDANT MCWHORTER'S DELIBERATE
DAMAGE TO PLAINTIFF'S PROFESSIONAL STANDING**

Under Florida law, tortious interference arises when a defendant intentionally and unjustifiably disrupts an existing or prospective business relationship, causing harm. Defendant Randall Michael McWhorter's conduct was not a passive act of online commentary—it was an orchestrated campaign of digital disruption aimed at destroying Plaintiff's professional stability and reputation through the coordinated targeting of his employer, Bay Area Building Solutions.

The threat to “*make it real, real, real public*” was not mere hyperbole. It was a directive issued to a militant digital public uniquely responsive to McWhorter's content—an audience with a well-documented pattern of swarming, contacting employers, and engaging in coordinated campaigns to isolate and economically harm the individuals featured in his videos. This audience is not an ordinary *public* but a predictable and reactive enforcement arm of McWhorter's online persona, accustomed to carrying out reputational punishment on command. When McWhorter issued his threat, he was not predicting what might happen—he was activating what he had built.

The results followed exactly as designed. After McWhorter's June 14, 2025 publication, Bay Area Building Solutions became the target of a sustained reputational assault resembling a digital denial-of-service attack DDOS. The company's public review channels were flooded. On Facebook, users posted comments and reviews accusing the company of employing “*racists*” and “*murderers*.” On Google, fraudulent one-star reviews appeared in rapid succession, many echoing McWhorter's own defamatory narrative that Plaintiff had acted with “*premeditation*” and “*violent intent*.” These attacks did not arise organically—they were the foreseeable, intended cascade of McWhorter's incitement to “*make it public*.”

Each review, post, and public denunciation functioned as an extension of McWhorter's original publication. The communications he triggered directly interfered with the business reputation

and client confidence of Bay Area Building Solutions, striking at the core of Plaintiff's employment relationship. By attaching Plaintiff's name, face, and city to the accusation of *premeditated violence*, McWhorter supplied his followers with the data points necessary to identify, contact, and defame the employer. He therefore bears full responsibility for the predictable chain of interference that ensued.

That chain included not only anonymous members of his summoned public but also identifiable actors—most notably, Defendant Michael Shawn Tenenblatt. Acting as a member of the “*public*” McWhorter had unleashed, Tenenblatt consumed the defamatory narrative and repurposed it into four separate videos of his own, accompanied by a cyberstalking playlist titled “*Temu Adam Sandler*” targeting Plaintiff. Tenenblatt's first such video juxtaposed McWhorter's accusations with imagery of Plaintiff's employer, pairing the same false insinuations with footage of the company's website and branding. The intended purpose of that content was unmistakable: to pressure the employer, to shame the business, and to sever Plaintiff's professional relationship.

Defendant Tenenblatt is not an outlier—he is evidence of the pattern. He is the embodiment of the “*public*” that McWhorter claimed he would “*make it real, real, real public*” for. His derivative conduct proves that McWhorter's following acts as a relay system for harassment and interference, reproducing and amplifying the original defamatory material in progressively more localized and damaging forms. By publishing the initial call to action, McWhorter did more than defame Plaintiff—he created a self-perpetuating mechanism of interference that directly struck Plaintiff's livelihood and extended to the employer itself.

This sequence fulfills every element of tortious interference under Florida law. McWhorter's conduct was intentional, malicious, and unjustified. His communications were designed to mobilize an aggressive public into targeting Plaintiff's workplace and inflicting reputational and economic injury. The resulting flood of false and defamatory public reviews, coupled with Defendant Tenenblatt's amplification, caused substantial disruption to Bay Area Building Solutions' reputation and commercial integrity, as well as direct harm to Plaintiff's employment relationship.

The foreseeability of this outcome was not incidental—it was the operational logic of McWhorter's threat. By summoning a militant audience trained through repetition to punish those he features, McWhorter accepted and directed the consequences of their actions as his own. The "*public*" he commands acts as his instrument, and the interference they carried out was the execution of his design. In both cause and effect, McWhorter's conduct was a coordinated act of professional sabotage, forming a complete and actionable cause of action for tortious interference under Florida law.

VII. STATEMENT OF FACTS REGARDING DEFENDANT MICHAEL SHAWN TENENBLATT

44. On June 15, 2025, Defendant Michael Shawn Tenenblatt published a video to his TikTok account containing statements identifying Plaintiff by name and presenting false assertions concerning Plaintiff's character and conduct. The video also includes imagery obtained from Plaintiff's employer's public website, showing photographs of employees, community members, and charitable activities associated with the company.

At the time captured, the post displayed approximately 1.5 million views, 173,500 likes, 3,699 comments, and 8,343 shares, indicating substantial public visibility and engagement.

The live location URL of the June 15, 2025 video is:

https://www.tiktok.com/@floridian_druid/video/7516150662623710494.

45. The video runs approximately one minute and eight seconds in duration.

46. In the video, Defendant Tenenblatt states:

“Ladies and gentlemen, meet who the internet has dubbed Temu Adam Sandler; or what we’re going to affectionately call him, Travess Matthew Wolford. You see, Travess here, like other MAGA creators, thinks it’s funny to get on the internet and spread misinformation that you can just run over peaceful protesters that are standing in the road with your car. Well, Travess, I wonder if that mentality matches with your employer, Bay Area Building Solutions. I think all the people of Tampa Bay, liberal or not, should know the person that’s being hired to build their buildings would gleefully run them over with a car and then post about it online to brag about it. None of these seem to align with your company’s culture, which is providing the optimum environment for those employees to best serve our clients, who is dedicated to improving the communities in which we live. Travess, you messed up.”

47. Defendant Tenenblatt stated: *“Ladies and gentlemen, meet who the internet has dubbed Temu Adam Sandler; or what we’re going to affectionately call him, Travess Matthew Wolford.”*

48. The phrase *“Temu Adam Sandler”* is a nickname applied to Plaintiff that combines two references:

(a) “Temu,” a Chinese-based e-commerce marketplace widely known for selling extremely

inexpensive mass-produced goods, imitation products, and low-cost knockoff versions of name-brand items through aggressive social media advertising; and

(b) “Adam Sandler,” a well-known American actor and comedian with a widely recognizable face and public persona.

When used together as “*Temu Adam Sandler*,” the phrase implies that Plaintiff is a “cheap knockoff” version of Adam Sandler and functions as an appearance-based insult.

49. The nickname “*Temu Adam Sandler*” originated as a high-engagement insult directed at Plaintiff in public responses to Defendant Randall Michael McWhorter’s earlier video about Plaintiff. Defendant Tenenblatt repeated and adopted that nickname in his own June 15, 2025 video.

50. The nickname “*Temu Adam Sandler*” does not describe any act, conduct, or statement by Plaintiff. It exists only to degrade Plaintiff’s appearance and identity and became a repeated label that Defendant Tenenblatt continued to apply to Plaintiff in his subsequent publications.

51. Defendant Tenenblatt then stated: “*You see, Travess here, like other MAGA creators, thinks it’s funny to get on the internet and spread misinformation that you can just run over peaceful protesters that are standing in the road with your car.*”

52. Plaintiff does not identify as a “*MAGA creator*,” and does not present himself as a social media “*creator*,” “*influencer*,” or public figure. Plaintiff does not sell merchandise, does not solicit paid support from viewers, and does not use subscriber monetization features.

53. Plaintiff's social media usage consists of personal commentary. Plaintiff does not treat his content as a brand, does not promote himself as an entertainer or commentator, and does not attempt to build or manage an online following.

54. Plaintiff has never stated or suggested that it is lawful, acceptable, or "*funny*" to "*run over peaceful protesters that are standing in the road with your car.*" Plaintiff has never approved of violence against any person or group.

55. Plaintiff's prior statements referenced his own threshold for perceived danger in a hypothetical roadway scenario in which he personally is unlawfully blocked or detained. Those statements did not refer to "*peaceful protesters,*" did not describe pleasure in harming anyone, and did not encourage violence. Any reference to "*running over*" or "*running down*" protestors originates solely from Defendant Tenenblatt's statements and is not in any way shape or form a reaction to Plaintiff's statements or conduct.

56. Defendant Tenenblatt then stated: "*Well, Travess, I wonder if that mentality matches with your employer, Bay Area Building Solutions.*"

57. In this statement, Defendant Tenenblatt treated the "*mentality*" he attributed to Plaintiff — specifically, that Plaintiff *would run people over with a car* and treat that conduct as entertainment — as if it were Plaintiff's actual mindset. He then connected that alleged mindset directly to Plaintiff's employer, Bay Area Building Solutions.

58. Defendant Tenenblatt next stated: "*I think all the people of Tampa Bay, liberal or not, should know the person that's being hired to build their buildings would gleefully run them over with a car and then post about it online to brag about it.*"

59. Plaintiff has never stated or implied that he would “*gleefully*” harm any person with a vehicle or otherwise. Plaintiff has never described enjoyment, excitement, or pride in connection with physical injury to any other person. Plaintiff has never contemplated or stated in any way shape or form that he would “*gleefully run over*” any client of Bay Area Building Solutions or any member of the public seeking to hire a building contractor in the Tampa Bay area..

60. Plaintiff has never stated that he would “*post about it online to brag about it,*” and has never suggested that he would commit an act of violence and then celebrate it publicly.

61. Plaintiff is a site superintendent in the construction industry. His work involves supervision of renovation and conversion projects, coordination of trades, and jobsite safety. None of Plaintiff’s job duties or professional conduct correspond in any way to the conduct or mindset described in Defendant Tenenblatt’s statements. Defendant Tenenblatt's statements about Plaintiff are outright lies.

62. Defendant Tenenblatt then stated: “*None of these seem to align with your company’s culture, which is providing the optimum environment for those employees to best serve our clients, who is dedicated to improving the communities in which we live.*”

63. In this statement, Defendant Tenenblatt directly compared the conduct and “*mentality*” he had assigned to Plaintiff — including allegedly “*gleefully*” running people over and bragging about it — to the stated culture and community-facing values of Bay Area Building Solutions. He asserted that the conduct he described for Plaintiff does not align with the employer’s stated values.

64. By placing Bay Area Building Solutions' stated culture next to those assigned statements about Plaintiff, Defendant Tenenblatt presented Plaintiff's employer as responsible for, or answerable for, the conduct he claimed Plaintiff would engage in. The conduct he claimed Plaintiff has or did engage in was an outright lie.

65. Defendant Tenenblatt's statements invited viewers in the Tampa Bay area to treat Plaintiff's continued employment as a matter of public concern based on those attributions about Plaintiff's supposed willingness to harm others and "*brag about it.*"

66. After making those statements about Plaintiff and his employer, Defendant Tenenblatt concluded the video by stating: "*Travess, you messed up.*"

67. The phrase "*Travess, you messed up*" is phrased as a direct address to Plaintiff. It is presented as a message to Plaintiff personally, and not as commentary about Plaintiff to a general audience. It is spoken in the second person and constitutes unwanted direct communications.

68. The caption of the June 15, 2025 video reads: "*Heeeyyyyyy @Outrage_Admin enjoy! :) #leftist #fyp #progressive #florida #tampa #protests #protest.*"

69. The caption includes a direct tag of Plaintiff's former TikTok handle, *@Outrage_Admin*, and uses the word "*enjoy.*" The structure of the caption is not descriptive of the content for viewers; it is directed to Plaintiff and constitutes unwanted direct communications.

70. The same June 15, 2025 video remains publicly accessible on Defendant Tenenblatt's TikTok account and is included in a playlist titled "*Temu Adam Sandler,*" which contains multiple videos about Plaintiff and repeatedly applies the "*Temu Adam Sandler*" label to Plaintiff while continuing to make statements about him and his employment.

71. The video contains multiple visible editing and sequencing features, including animated text overlays, timed on-screen captions, imported still images, full-screen image replacements, and timed visual transitions between recording segments.

72. These features reflect manual actions taken by Defendant Tenenblatt, including selecting text overlay styles, determining their size and location, setting the order of visual elements, and choosing when each appears and disappears within the sequence.

73. Throughout the video, animated text appears in synchronization with Defendant Tenenblatt's spoken narration. Defendant Tenenblatt selected, positioned, and sized this text to remain visible and aligned with his words as he spoke.

74. The video includes imported image overlays consisting of: (a) a photograph of Plaintiff and Plaintiff's dog matching the same image used in Defendant Randall Michael McWhorter's prior video; (b) what appears to be Plaintiff's professional résumé; and (c) screenshots captured from Bay Area Building Solutions' website showing employees, community material, and charity-related imagery.

75. The initial segment of the video, covering approximately seconds 0 through 9, displays a clip of Plaintiff's original TikTok video. This clip shows a visible watermark of Plaintiff's former username, *@Outrage_Admin*, in the lower portion of the frame.

76. The watermark visible in that segment indicates that Defendant Tenenblatt saved the clip externally and re-uploaded it into an editing platform rather than using TikTok's "stitch" feature, which does not display a watermark of the original creator's handle.

77. At approximately seconds 0 through 3, a centered text overlay appears reading “*Another MAGA EXPOSED.*” Defendant Tenenblatt selected the overlay, positioned it in the middle of the frame, and set its duration to begin at the start of the video and fade by approximately second 3.

78. Between approximately seconds 5 and 8, another overlay appears reading “*stitch incoming.*” Defendant Tenenblatt manually positioned and sized this overlay and defined a start and end time so that it appeared and faded within that window.

79. At approximately second 10, the video transitions from the clip of Plaintiff to new footage showing Defendant Tenenblatt speaking directly to the camera while holding a microphone. During this portion, an animated text overlay appears reading “*#temu Adam Sandler*” and then fades from view. Defendant Tenenblatt selected, positioned, and sized this overlay and determined the time at which it appeared and disappeared.

80. After that overlay clears, an image of Plaintiff and Plaintiff’s dog appears on screen in front of Defendant Tenenblatt between approximately seconds 10 and 20. Defendant Tenenblatt imported the image, placed it within the frame, and sized it to align with his narration during that interval.

81. During this same interval, Defendant Tenenblatt stated, and the animated text overlay simultaneously displayed, “*Ladies and gentlemen, meet who the internet has dubbed Temu Adam Sandler, or what we’re going to affectionately call him, Travess Matthew Welford.*”

82. The segment displays visible jump cuts—brief breaks in motion showing that Defendant Tenenblatt stopped recording and resumed between takes, later joining the clips into a continuous sequence.

83. The video then continues into another discrete segment in which Defendant Tenenblatt states, and the on-screen captioning displays, *“You see, Travess here, like other MAGA creators, thinks it’s funny to get on the internet and spread misinformation that you can just run over peaceful protesters that are standing in the road with your car.”* This segment also shows the same stop-and-start pattern characteristic of manually spliced recording.

84. A new segment begins at approximately second 31, marked by a visible motion cue in which Defendant Tenenblatt moves his hand away from the recording device.

85. At approximately second 34, a full-screen image overlay appears showing what appears to be Plaintiff’s professional résumé. The image replaces the camera view and remains on screen until approximately second 38, when it transitions off screen.

86. Following the résumé overlay, Defendant Tenenblatt resumes speaking on camera. Near the end of this portion, another visible jump cut occurs, consistent with the same stop-and-restart pattern used throughout the recording.

87. During this segment, Defendant Tenenblatt states, and the on-screen text displays, *“Well, Travess, I wonder if that mentality matches with your employer, Bay Area Building Solutions. I think all the people of Tampa Bay, liberal or not, should know the person that’s being hired to build their buildings would gleefully run them over with a car and then post about it online to brag about it.”*

88. Immediately after this portion, Defendant Tenenblatt continues speaking while still holding a microphone in his hand.

89. Between approximately seconds 52 and 58, a full-screen image overlay appears showing screenshots from Bay Area Building Solutions’ website, including employee photographs and community-facing materials. Defendant Tenenblatt imported these screenshots, positioned them within the frame, and set the time duration of their appearance.

90. Between approximately seconds 58 and 60, Defendant Tenenblatt looks away from the camera while continuing his narration. His gaze is directed toward another screen while he speaks, indicating reference to material located off camera, he was reading content directly from Bay Area Building Solutions website during this moment.

91. Immediately following, another full-screen image overlay appears showing additional charitable and community-related materials from Bay Area Building Solutions’ website. Defendant Tenenblatt inserted this image and defined its appearance and removal within the closing portion of the video.

92. Defendant Tenenblatt accessed Bay Area Building Solutions’ public website, selected screenshots of unrelated employees and community imagery, and inserted them into the sequence beside his spoken statements about Plaintiff, pairing Plaintiff’s identity with the employer’s branding.

93. While those overlays were displayed, Defendant Tenenblatt stated, and the captions reflected, *“None of these seem to align with your company’s culture, which is providing the optimum environment for those employees to best serve our clients, who is dedicated to improving the communities in which we live. Travess, you messed up.”*

94. The video concludes with Defendant Tenenblatt reappearing on camera, smiling, and stating directly, *“Travess, you messed up.”*

95. The completed video is composed of individually recorded segments assembled together, incorporating text overlays, synchronized captions, and imported images arranged through deliberate selection, placement, and timed sequencing.

96. Each visible change—overlay, image insertion, or transition—represents a distinct act of editing carried out by Defendant Tenenblatt.

97. The video presents Plaintiff’s name, likeness, and employment context alongside statements asserting that Plaintiff would *“gleefully run people over with a car,”* would *“post about it online to brag about it,”* and does not align with the stated values of his employer.

98. On June 17, 2025, Defendant Michael Shawn Tenenblatt published a video to TikTok at the following live location URL:

https://www.tiktok.com/@floridian_druid/video/7517038414999457054.

99. In the video, Defendant Tenenblatt stated:

“We have an update on Travess. Sorry, I’m not in my normal get-up, but it was just too exciting. I had to let you guys know. After posting consecutive posts on Sunday night about how liberals going after him aren’t going to do anything, and between Tizzy’s post and my post, ladies and gentlemen, I am proud to announce... He’s gone. After what I’m sure was an eventful Monday morning at his job, if he still has one, guess the outrage admin couldn’t handle all the outrage. And it’s all thanks to you guys. I am literally just the platform to amplify voices. I couldn’t do

what I do without your help. Let's keep up the good fight, guys. Never stay silent. Never back down."

100. The video runs approximately one minute and two seconds in duration.

101. The opening segment contains source material originating from Plaintiff's prior TikTok video. A visible watermark of Plaintiff's former username "@outrage_admin" appears in the lower portion of the frame, indicating that the video was saved externally and re-uploaded into an off-platform editing environment before publication.

102. An animated text overlay appears during this opening sequence, styled in black, white, and red text positioned toward the upper portion of the frame, reading "*update on temu adam sandler.*"

103. Throughout the publication, Defendant Tenenblatt uses an animated captioning feature that types his spoken narration on screen in real time, mirroring the sequence of his words as he speaks.

104. From approximately seconds 10 through 17, Defendant Tenenblatt states, and the on-screen captions simultaneously type: "*We have an update on Travess. Sorry, I'm not in my normal get-up, but it was just too exciting. I had to let you guys know.*" This segment ends with a visible jump cut, observed as a brief blip in the frame showing that the recording was stopped and restarted.

105. From approximately seconds 17 through 23, Defendant Tenenblatt states, and the captions display: "*After posting consecutive posts on Sunday night about how liberals going after him aren't going to do anything.*" This segment concludes with another visible jump cut.

106. From approximately seconds 23 through 32, Defendant Tenenblatt states, and the on-screen text displays: *“And between Tizzy’s post and my post, ladies and gentlemen, I am proud to announce.”* The reference to “Tizzy” is Defendant Randall Michael McWhorter, whose June 14 video identified Plaintiff by name. A brief jump cut occurs at the end of this segment.

107. From approximately seconds 32 through 46, Defendant Tenenblatt appears on camera utilizing a green screen effect displaying an image of Plaintiff’s closed TikTok account behind him. The visible jump cut initiating this segment merges Defendant Tenenblatt’s prior statement *“And between Tizzy’s post and my post, ladies and gentlemen, I am proud to announce”* with his subsequent declaration *“He’s gone,”* delivered precisely as the background transitions to the image of Plaintiff’s deactivated account. Defendant Tenenblatt immediately continues, stating: *“After what I’m sure was an eventful Monday morning at his job, if he still has one, guess the outrage admin couldn’t handle all the outrage.”* The account had been temporarily closed by Plaintiff in response to a surge of harassment and direct threats following the prior publications. At approximately second 46, another visible jump cut occurs, observed as a blip in the frame corresponding with the removal of the green screen background.

108. From approximately seconds 46 through 52, a separate segment begins and ends with visible jump cuts. During this segment, Defendant Tenenblatt states, and the captions display: *“And it’s all thanks to you guys. I am literally just the platform to amplify voices, voices.”*

109. From approximately seconds 52 through 56, Defendant Tenenblatt continues, and the captions display: *“I couldn’t do what I do without your help.”* Another visible jump cut occurs at the end of this segment.

110. From approximately seconds 56 through the conclusion of the video at one minute and two seconds, Defendant Tenenblatt reappears on camera and states: *“Let’s keep up the good fight, guys. Never stay silent. Never back down.”* The animated text overlay continues to type his words across the screen as he speaks.

111. The caption affixed to Defendant Tenenblatt’s June 17 video reads: *“Cheers to another mission accomplished! #leftist #fyp #progressive #protests #protest #florida #tampa #greenscreen.”*

112. Within the comment section of the same publication, Defendant Tenenblatt posted the following on June 18, 2025: *“He’s back everyone! New post is up!!!”*

113. The structure of the June 17 video shows multiple individually recorded takes assembled together, with synchronized caption overlays and imported imagery from Plaintiff’s prior content arranged through a manual editing process.

114. The video remains publicly accessible on Defendant Tenenblatt’s TikTok account.

115. The caption affixed to Defendant Tenenblatt’s June 17, 2025 TikTok video reads *“Cheers to another mission accomplished! #leftist #fyp #progressive #protests #protest #florida #tampa #greenscreen.”* The word *“mission”* denotes a coordinated effort directed toward a defined goal and implies participation, leadership, and completion of a shared task. In this context, Defendant Tenenblatt’s statement celebrates the outcome he describes in the same video—that Plaintiff’s TikTok account had been closed. Within the video, Defendant Tenenblatt states *“between Tizzy’s post and my post”* and, in other communications, references *“between @tizzyent and my post it’s over 300K views about Travess, y’all are definitely doing your part to make it happen.”* These

statements present Defendant Tenenblatt's actions as connected to those of Defendant Randall Michael McWhorter and the audience engagement surrounding both posts. Defendant Tenenblatt further states *"I am literally just the platform to amplify voices"* and *"let's keep up the good fight,"* indicating an ongoing group effort that he situates himself within as a participant and amplifier. Plaintiff maintains contemporaneous records showing that in the comment thread of Defendant Tenenblatt's June 15, 2025 video, the term *"premeditated"*—originally used by Defendant McWhorter to describe Plaintiff's speech—was repeatedly used by respondents. These patterns, taken together, show that Defendant Tenenblatt's June 17 publication positioned his content and audience activity in direct continuity with Defendant McWhorter's prior publication and the surrounding viewer discussions.

116. On June 18, 2025, Defendant Michael Shawn Tenenblatt published a video to TikTok (NPA) at the following live location URL:

https://www.tiktok.com/@floridian_druid/video/7517279436475993374?is_from_webapp=1&sender_device=pc&web_id=7502216441342461471.

117. The publication runs approximately one minute and three seconds in duration.

118. The full sequence of spoken and on-screen statements contained in the video is as follows:

(Opening overlay: "looks we got unhappy Gilmore," cartoon character rolling on floor laughing.)

"I wasn't aware that committing crimes was political."

(Cut to Plaintiff statements, green-screen overlay)

"They have come at me with a campaign of threats of violence and death." — statement made by Plaintiff as part of the green-screen sequence.

(Cut back to Defendant Tenenblatt)

“If this is true, I absolutely condemn it and don’t condone this kind of behavior at all.”

“But what do you think you did? That’s the whole reason the video was made about you, Travess. So instead of starting a campaign of, oh, I’m the victim and I’m being canceled, why don’t you take responsibility for the things you put out in the public forum? But you won’t.”

119. The video begins with a clip originating from Plaintiff Travess Matthew Welford’s TikTok (NPA) account, referencing the harassment he experienced following Defendant Randall Michael McWhorter’s June 14, 2025 video.

120. The opening segment shows Plaintiff stating that he has received targeted harassment for expressing valid political thought.

121. A visible TikTok (NPA) watermark displaying Plaintiff’s username appears throughout this opening clip, indicating that the material was saved from Plaintiff’s account and exported to an external editing environment before upload.

122. From approximately seconds 1 through 7, an animated text overlay appears across Plaintiff’s face reading *“Looks we got Unhappy Gilmore.”* The overlay is styled in white, black, and red consistent with prior videos attributed to Defendant Tenenblatt.

123. At approximately second 8, a cartoon character appears in the frame, positioned to appear laughing while Plaintiff states that he received death threats.

124. At approximately second 15, the video transitions by visible jump cut from Plaintiff’s clip to Defendant Tenenblatt appearing on camera holding a microphone.

125. Between seconds 15 and 20, Defendant Tenenblatt responds to Plaintiff's prior statement, saying *"Really, valid political thought?"* while holding a microphone.

126. At approximately second 20, the scene transitions by jump cut back to Plaintiff's original video, in which Plaintiff states, *"If one of your dumbass protests ends up in the road, and tries to stop me from going somewhere, the law lets me plow right through ya."*

127. The segment described in paragraph 126 includes the visible TikTok (NPA) watermark identifying the clip as sourced from Plaintiff's account.

128. At approximately second 26, Defendant Tenenblatt reappears on camera holding a microphone and states, *"I wasn't aware committing crimes was political."* a direct accusation that Plaintiff's speech amounts to a crime.

129. From approximately seconds 30 through 37, the video again shows a clip from Plaintiff's account in which Plaintiff states that he has been targeted with a campaign of violence and death threats.

130. At approximately second 38, Defendant Tenenblatt reappears on camera holding a microphone and states, *"If this is true I absolutely condemn it and don't condone this kind of behavior at all, but what do you think you did, that's the whole reason the video was made about you, Travess."*

131. At approximately second 50, Defendant Tenenblatt continues, stating, *"So instead of starting your campaign of 'oh I'm the victim and I'm being cancelled,' why don't you take responsibility for the things you put out in the public forum, but you won't."*

132. The final segment described in paragraph 131 concludes the video, which ends at approximately one minute and three seconds in duration.

133. The caption affixed to the publication reads: *“Travess thinks being held accountable for his words makes him a victim. #leftist #fyp #progressive #protest #florida #tampa.”*

134. The publication is addressed entirely in the second person, with Defendant Tenenblatt speaking directly to Plaintiff by name throughout the recording.

135. The June 18 video remains publicly accessible on Defendant Tenenblatt’s TikTok (NPA) account.

136. On June 30, 2025, Defendant Michael Shawn Tenenblatt published a video to TikTok (NPA) at the following live location URL:

https://www.tiktok.com/@floridian_druid/video/7521722074113608990. The full sequence of spoken and on-screen statements contained in the publication is as follows:

“Have you been following one of the most entertaining MAGA dumpster-fire FAFO stories of the summer? No? Let me catch you up to speed.”

(Cut to Plaintiff’s statement)

“Hey liberals, guess what? I’m in Florida, and if one of your dumbass protests ends up in the road and tries to stop me from going somewhere, the law lets me plow right through ya.”

(Cut back to Defendant Tenenblatt)

“You see, Travess here did a real airhead thing. He jumped on a MAGA trend and claimed that a protester merely blocking his way gave him the right to plow right through them. Suddenly, it wasn’t Happy Gilmore (1996). It was 50-plus Google reviews and a call from HR, and not one

ended with, ‘You still work here?’ Travess could have taken the grown-up route and not been an Unhappy Gilmore, accepted the consequences of his dirty work, but instead he’s made his entire personality just one long episode of Anger Management (2003). Except, instead of seeking therapy, he’s become a regular Grandma’s Boy (2006) and is currently threatening to sue anyone who comments on his public profiles. So here we are today — Travess, the self-appointed Big Daddy (1999) of Chat GPT defamation lawsuits, patrolling the internet like The Cobbler (2014), trying to squeeze his crusty, unemployed foot into the polished shoe of a legal mastermind. And shocker — it doesn’t fit. So the moral of the story? Don’t be Travess. Or do, if you like being unemployed, overconfident, and staring into your own personal low-budget Temu Adam Sandler meltdown.”

137. Defendant Michael Shawn Tenenblatt’s June 30, 2025 video runs approximately one minute and twenty-nine seconds in duration and was published to TikTok (NPA) at the URL listed in paragraph 136.

138. The June 30 video is the fourth video created and published by Defendant Tenenblatt that references or discusses Plaintiff Travess Matthew Wolford.

139. The video opens with Defendant Tenenblatt on camera holding a microphone. An animated text overlay reading “*The FAFO Saga of the summer!!!*” appears on screen between approximately seconds 1 and 3 before disappearing.

140. Placement of the animated text overlay required manual entry, positioning, sizing, styling, confirmation, and timing to synchronize with the opening sequence of the video.

141. Between approximately seconds 1 and 8, Defendant Tenenblatt, through spoken narration and animated text, states: *“Have you been following one of the most entertaining MAGA dumpster-fire FAFO stories of the summer? No? Let me catch you up to speed.”*

142. At approximately second 8, the video transitions by jump cut to a clip of Plaintiff’s original TikTok (NPA) video containing Plaintiff’s statement: *“Hey liberals, guess what? I’m in Florida, and if one of your dumbass protests ends up in the road and tries to stop me from going somewhere, the law lets me plow right through ya.”*

143. The inserted clip displays a visible TikTok (NPA) watermark identifying Plaintiff’s username, indicating that the material was saved from Plaintiff’s account and imported into an external editing suite for use in Defendant Tenenblatt’s production.

144. At approximately second 19, the video transitions by jump cut back to Defendant Tenenblatt, who appears on camera holding a microphone and speaking continuously until the end of the publication.

145. From approximately second 19 through one minute and twenty-nine seconds, Defendant Tenenblatt delivers a continuous monologue referencing Plaintiff by name and making multiple statements, including:

“You see, Travess here did a real airhead thing. He jumped on a MAGA trend and claimed that a protester merely blocking his way gave him the right to plow right through them. Suddenly, it wasn’t 50 First Dates; it was 50-plus Google reviews and a phone call from HR, and not one of them ended with ‘You still work here.’ Travess could have taken the grown-up route and not been an Unhappy Gilmore and accepted the consequences of his Dirty Work, but instead he’s made his entire personality just one long episode of Anger Management. Except, instead of seeking

therapy, he's become a regular Grandma's Boy and is currently threatening to sue anyone who comments on any of his public profiles. So here we are today: Travess, the self-appointed Big Daddy of ChatGPT defamation lawsuits, patrolling the internet trying to squeeze his crusty unemployed foot into the polished shoe of a legal mastermind — and shocker, it doesn't fit. So the moral of the story: don't be Travess. Or do, if you like being unemployed, overconfident, and staring into your own personal low-budget Temu Adam Sandler meltdown."

146. The segment described in paragraph 145 is performed in a single continuous take without visible jump cuts and contains multiple direct references to films starring or produced by actor Adam Sandler and other comedy films from the same production circle.

147. *"50 First Dates"* (2004) is a romantic comedy film starring Adam Sandler and Drew Barrymore, produced by Happy Madison Productions and Columbia Pictures.

148. *"Happy Gilmore"* (1996) is a sports comedy film starring Adam Sandler as a failed hockey player who becomes a golfer; the film predates the formation of Happy Madison Productions and inspired its name.

149. *"Dirty Work"* (1998) is a comedy film directed by Bob Saget and starring Norm Macdonald and Artie Lange, featuring cameo appearances by Adam Sandler and Chris Farley.

150. *"Anger Management"* (2003) is a comedy film starring Adam Sandler and Jack Nicholson, co-produced by Happy Madison Productions and Revolution Studios.

151. *"Grandma's Boy"* (2006) is a comedy film produced by Happy Madison Productions, starring Allen Covert and Nick Swardson, members of Sandler's production group.

152. “*Big Daddy*” (1999) is a comedy film starring Adam Sandler as Sonny Koufax, produced by Happy Madison Productions and Columbia Pictures.

153. “*Mr. Deeds*” (2002) is a comedy film starring Adam Sandler as Longfellow Deeds, produced by Happy Madison Productions and Columbia Pictures. The film includes a recurring visual gag involving the character’s frostbitten and discolored foot.

154. Between approximately seconds 46 and 59, Defendant Tenenblatt overlays images of Plaintiff’s TikTok (NPA) and Instagram (NPA) profile pages while continuing the monologue described in paragraph 145.

155. The video concludes at approximately one minute and twenty-nine seconds in duration without further transitions or closing statements.

156. The publication remains publicly accessible on Defendant Tenenblatt’s TikTok (NPA) account.

157. Plaintiff has documented a consistent pattern in which Defendant Tenenblatt repeatedly uses the term “*Temu Adam Sandler*” while making false or disparaging statements about Plaintiff. In the June 30, 2025 video, Defendant Tenenblatt merges this recurring phrase with commentary on Plaintiff’s mental state, saying “*instead of seeking therapy*” and later describing Plaintiff as having a “*low-budget Temu Adam Sandler meltdown.*” This publication contains multiple statements and insinuations about Plaintiff that are inappropriate and factually untrue. The video script, built entirely around references to Adam Sandler films and the “*Temu Adam Sandler*” theme, continues Defendant Tenenblatt’s established pattern of appearance-based mockery while

simultaneously inserting unfounded claims regarding Plaintiff's mental stability and alleged conduct.

158. This video constitutes another example within a broad body of evidentiary material showing Defendant Tenenblatt repeatedly making false statements about Plaintiff's employment and professional status. Plaintiff is a general contracting professional whose daily responsibilities include reading blueprints, identifying scope gaps, anticipating scheduling bottlenecks, ensuring workers are treated respectfully and operate in a safe environment, fostering relationships with clients and coworkers, coordinating with building officials, and proactively resolving issues before they affect project outcomes. Plaintiff is entrusted with the successful completion of high-value construction projects for significant clients. It is therefore wholly inappropriate for Defendant Tenenblatt to publish false or misleading information on the internet concerning Plaintiff's professional role or reputation.

**ACTIONABLE CYBERSTALKING UNDER FLORIDA LAW — DEFENDANT
TENENBLATT'S WILLFUL AND MALICIOUS ONLINE CONDUCT CONSTITUTES
A VIOLATION OF § 784.048(1)(d) AND § 784.0485**

Defendant Michael Shawn Tenenblatt engaged in a willful, malicious, and repeated course of conduct directed at a single private individual—Plaintiff—using edited, packaged, and redistributed videos as the vehicle for continuous, unwanted electronic communications. Over the span of June 15–30, 2025, he did not merely “post” about Plaintiff; he planned, produced, and promoted a sequence of four themed videos that identified Plaintiff by full name, paired his likeness with criminal insinuations, tethered those insinuations to Plaintiff's employment, and addressed Plaintiff directly in the second person. Each iteration required deliberate

pre-publication steps—capturing or downloading material, importing it into an off-platform editor, arranging green-screen layers and employer imagery, synchronizing captions to narration, exporting final composites, drafting captions that speak to and about Plaintiff, and then publishing, pinning, and cross-promoting the result. That technical choreography is evidence of intent: every edit is a decision; every decision is a step toward harassment; every publication is a fresh, discrete contact. Under Florida law, that sequence constitutes a course of conduct—repeated, targeted communications that serve no legitimate purpose and inflict substantial emotional distress.

The centerpiece of this campaign is Defendant Tenenblatt’s “*Temu Adam Sandler*” playlist—an organizing container engineered to stalk by design. It is not an incidental label or passing joke; it is the file cabinet where the harassment lives, the front-door banner that instructs viewers how to find, sort, and revisit content about Plaintiff on demand. The playlist collects four videos into a single stalking instrument, fixes them in a dedicated channel of discovery, and re-surfaces them through platform recommendation mechanics each time Defendant posts, streams, or drives traffic to his profile. He promotes this playlist, pins it, and speaks in ways that funnel viewers back to it, turning a fleeting post into a standing exhibit of humiliation. By design, a playlist is persistent and evergreen; it survives the news cycle and re-contacts the target each time the platform serves it to new eyes. That persistence is the point. It converts momentary visibility into ongoing exposure and transforms the ordinary scroll into an automatic re-publication of the same unwanted message to the same specific person, the Plaintiff in this case.

Defendant’s own words confirm purpose and effect. When he declared, “*between Tizzy’s post and my post ... I am proud to announce ... he’s gone,*” and “*Cheers to another mission accomplished,*” he was not commenting on a public controversy; he was celebrating

suppression—announcing that Plaintiff had closed an account under pressure and urging followers to “*keep up the good fight.*” In context, “*mission accomplished*” is not a benign flourish. It is an admission that the objective of the campaign was never discourse; it was silence. Under § 784.048(1)(d), communications intended to torment and coerce a specific person by threatening their reputation and social standing—especially when sustained across multiple videos and tied to employment—serve no legitimate purpose. They are the very conduct the statute prohibits.

The manner of production underscores mens rea. Defendant selects Plaintiff’s videos and images, extracts them from their source, and re-frames them with Defendant’s voiceover as a prosecutorial narration directed to Plaintiff by name. He layers employer branding and screenshots to yoke the false characterizations to Plaintiff’s livelihood, then times captions to ride over key phrases—“*gleefully run them over,*” “*you messed up,*” “*never stay silent.*” Each cut, overlay, and caption is a conscious act that carries the message forward: Plaintiff is dangerous, unfit, unstable, and unemployable. This is planning followed by execution, again and again, until the four-video chain becomes the digital equivalent of surveillance—content that tracks the target’s identity and workplace, all of it stored and promoted inside the stalking container Defendant labeled *Temu Adam Sandler*.

The playlist’s branding is itself proof of malice. “*Temu Adam Sandler*” is a caricature that reduces Plaintiff’s appearance and humanity to a meme and then weaponizes that meme as the index for finding him. The phrase did not arise in good-faith commentary; it grew out of mockery threads and was then elevated by Defendant into a persistent headline under which he catalogued Plaintiff’s name, image, employer, and the accusation that he would “*gleefully run people over with a car.*” By tying that caricature to insinuations of criminality and mental

instability—“*meltdown*,” “*unemployed*,” “*you messed up*”—Defendant used ridicule as the adhesive that keeps viewers circling back, guaranteeing that the playlist remains a standing billboard of humiliation. The fact that the same phrase later surfaced on a death threat mailed via USPS to Plaintiff confirms how Defendant’s labeling choices function in the world: they are not humor; they are targeting.

This is not spontaneous speech; it is an operation. Defendant’s captions—“*Travess, you messed up*,” “*Cheers to another mission accomplished*,” “*let’s keep up the good fight*”—are the chapter headings of that operation. They mark stages: select the target; publish the accusation; drive the audience to the employer; measure the impact; celebrate the suppression; call for more. Florida’s cyberstalking statute captures exactly this pattern: repeated, unwanted electronic communications, directed at a specific person, that cause substantial emotional distress and serve no legitimate purpose. The four videos in the playlist each constitute a separate communication. The playlist that binds them constitutes the structural choice that makes those communications continuous. The promotion and pinning constitute the amplification that ensures those communications persist.

Defendant Tenenblatt cannot cloak this conduct as commentary on public issues when the content is engineered to silence the private individual at its center. He did not engage the merits of policy; he staged a ritual of exposure. He took Plaintiff’s name, face, and employment and wrapped them inside a caricatured brand; he told his audience who to target, why to target, and when the mission was “*accomplished*.” That is stalking in the language of the statute: willful, malicious, repeated contact without legitimate purpose, calculated to terrorize by reputation and to isolate by employment pressure. The law does not require Plaintiff to endure it. It requires the

Defendant to stop.

**CAUSE OF ACTION UNDER FLORIDA LAW FOR DEFAMATION PER SE ARISING
FROM DEFENDANT MICHAEL SHAWN TENENBLATT'S MALICIOUS
CHARACTER ASSASSINATION AND FALSE IMPUTATIONS OF CRIMINALITY,
MENTAL INSTABILITY, AND PROFESSIONAL UNFITNESS**

Under Florida law, a statement is defamatory per se when it falsely imputes to another the commission of a crime, conduct incompatible with the proper exercise of their profession, or a mental or moral deficiency rendering them unfit for social or professional association. In such cases, damages are presumed as a matter of law. The statements made by Defendant Michael Shawn Tenenblatt in his publication concerning Plaintiff fall squarely within that category.

The defamatory sequence begins with the assertion: *"You see, Travess here, like other MAGA creators, thinks it's funny to get on the internet and spread misinformation that you can just run over peaceful protesters that are standing in the road with your car."* This statement directly imputes to Plaintiff the advocacy of criminal violence—namely, vehicular homicide or aggravated assault with a deadly weapon. Under Florida law, any false suggestion that an individual has committed or condoned a violent felony constitutes defamation per se, as it exposes the individual to hatred, distrust, and contempt and destroys his standing in the community.

Defendant escalates the defamation by stating, *"I wasn't aware that committing crimes was political."* This line is not rhetorical; it is a direct accusation that Plaintiff's speech or conduct constitutes a *crime*. The subsequent remark—*"But what do you think you did? That's the whole*

reason the video was made about you”—falsely implies that Plaintiff *did something criminal* and that Defendant McWhorter’s video was a justified response to proven misconduct. In truth, no such act occurred; Defendant McWhorter fabricated the narrative entirely to generate outrage, virality, and merchandise sales, advertising his “*Right Over Wrong*” shirt without the legally required FTC disclosure and directing traffic to his PayPal and Venmo accounts for personal profit. The implication that Plaintiff’s conduct justified public exposure is therefore false, malicious, and made with reckless disregard for truth.

Defendant then continued: “*Travess here did a real airhead thing. He jumped on a MAGA trend and claimed that a protester merely blocking his way gave him the right to plow right through them.*” This statement deliberately misrepresents Plaintiff’s lawful speech, which referenced Florida’s codified protections for motorists unlawfully detained during roadway blockades—not a “*protester merely blocking his way.*” The false suggestion that Plaintiff endorsed the killing of innocents is an *accusation of moral depravity* and a *false attribution of criminal intent*, actionable as *defamation per se* under Florida law.

Defendant’s narrative then pivots from accusation to defamatory mockery, fusing false factual claims with appearance-based ridicule and mental health insinuations: “*Suddenly, it wasn’t Happy Gilmore (1996). It was 50-plus Google reviews and a call from HR... Travess could have taken the grown-up route... but instead he’s made his entire personality one long episode of Anger Management (2003)... instead of seeking therapy, he’s become a regular Grandma’s Boy (2006)... Travess, the self-appointed Big Daddy (1999) of ChatGPT defamation lawsuits... trying to squeeze his crusty, unemployed foot into the polished shoe of a legal mastermind... Don’t be Travess... unless you like being unemployed, overconfident, and staring into your own personal low-budget Temu Adam Sandler meltdown.*”

These statements are not parody; they are calculated defamations packaged as entertainment. Defendant explicitly attributes to Plaintiff (1) unemployment, (2) mental instability, (3) professional incompetence, and (4) moral unfitness—all independently defamatory per se under Florida law. By invoking a sequence of “*mental health*” tropes—“*Anger Management*,” “*therapy*,” and “*meltdown*”—Defendant imputes psychological unwellness to Plaintiff, implying instability and unfitness to perform professional duties. Florida courts have long recognized that such accusations—suggesting that a person suffers from mental illness or moral deficiency—constitute defamation per se because they directly harm the individual’s business reputation and standing in the community.

The recurring “*Temu Adam Sandler*” theme amplifies the malice of the attack. This label functions as a malicious caricature, a shorthand of ridicule born from an online campaign of appearance-based harassment and sustained repetition in comment threads, hashtags, and video playlists. It became the unifying symbol of a cyberstalking pattern directed at Plaintiff—one so pervasive that it appeared on a death threat mailed to Plaintiff’s home via USPS. Defendant Tenenblatt’s adoption of this tag was therefore not humor but participation in a coordinated campaign of defamation and intimidation. The *Temu Adam Sandler* moniker is an emblem of malice—its invocation signifies deliberate ridicule and degradation.

In the aggregate, Defendant’s statements present Plaintiff as a violent extremist, an unhinged and unemployable man, and a danger to the community. They target his profession, his mental health, and his reputation, blending accusation, mockery, and falsehood into a single defamatory mosaic. Each element satisfies an independent ground for defamation per se under Florida law, and damages are presumed because the nature of the statements—criminal accusation, professional

disparagement, and personal defilement—are so inherently injurious that harm to reputation is the legal and natural result.

Defendant’s conduct was motivated by malice and executed through a medium designed for maximum reputational destruction. The defamatory narrative, buttressed by deliberate pop-culture framing and repetition of falsehoods, constitutes a sustained campaign of humiliation under the guise of humor. The damage to Plaintiff’s name and livelihood was not hypothetical—it was the certain and foreseeable consequence of Defendant’s reckless disregard for truth and his participation in a coordinated enterprise of defamation, harassment, and employer interference. Under Florida law, such conduct gives rise to an unequivocal cause of action for defamation per se, and the presumption of damages flows directly from the nature of the words themselves. They are presumed, and documented at scale.

**CAUSE OF ACTION ESTABLISHED UNDER FLORIDA LAW FOR ATTACHING
LIABILITY TO DEFENDANT MICHAEL SHAWN TENENBLATT FOR TORTIOUS
INTERFERENCE WITH PLAINTIFF’S EMPLOYMENT RELATIONSHIP**

Defendant Michael Shawn Tenenblatt engaged in a deliberate, repeated course of conduct directed at Plaintiff’s employment with Bay Area Building Solutions, Inc. Defendant (1) identified the existence of that employment relationship on camera, (2) urged third parties to treat Plaintiff’s continued employment as unacceptable, (3) coordinated and celebrated group action designed to inflict economic harm, and (4) publicly claimed success when that harm occurred.

On June 15, 2025, Defendant published a TikTok video naming Plaintiff, displaying Plaintiff's likeness and résumé, and placing those materials alongside screenshots taken from Bay Area Building Solutions' website, including photographs of employees, community outreach, and charitable messaging. In that same publication, Defendant asserted that Plaintiff *"thinks it's funny to get on the internet and spread misinformation that you can just run over peaceful protesters that are standing in the road with your car."* Defendant then directly tied those accusations to Plaintiff's job by stating, *"Well, Travess, I wonder if that mentality matches with your employer, Bay Area Building Solutions,"* and, *"I think all the people of Tampa Bay, liberal or not, should know the person that's being hired to build their buildings would gleefully run them over with a car and then post about it online to brag about it."* Defendant continued: *"None of these seem to align with your company's culture,"* and ended by addressing Plaintiff in the second person: *"Travess, you messed up."*

Those statements were not presented as abstract commentary. Defendant explicitly invoked Plaintiff's employer by name, asserted that Plaintiff's alleged *"mentality"* should be treated as the employer's problem, and told viewers in the Tampa Bay area that they should be aware that Bay Area Building Solutions was *"hiring"* Plaintiff. Defendant inserted the employer's branding, employees, and charitable material on screen at the moment he was accusing Plaintiff of violent criminal conduct and of *"gleefully"* harming others. Defendant thereby framed Bay Area Building Solutions as a party answerable for continuing to employ Plaintiff, and framed Plaintiff's ongoing employment as something the public should correct.

The reaction under that June 15 video confirms the expected result. The highest-engagement comments under that publication include coordinated plans to contact Plaintiff's employer, coordinated plans to post fraudulent one-star reviews, and calls to damage Bay Area Building

Solutions' public reputation for continuing to employ Plaintiff. Those calls to act against Plaintiff's employer appeared directly below Defendant's filmed statements linking Plaintiff's alleged conduct to Bay Area Building Solutions and asserting that such conduct did not "*align*" with the company's culture. Defendant did not distance himself from those efforts. He fostered them.

Defendant then escalated. On June 17, 2025, Defendant published another TikTok video in which he announced, "*Between Tizzy's post and my post ... I am proud to announce... He's gone,*" and, "*After what I'm sure was an eventful Monday morning at his job, if he still has one,*" followed by "*guess the outrage admin couldn't handle all the outrage.*" Defendant attributed that result to a coordinated effort, stating, "*And it's all thanks to you guys. I am literally just the platform to amplify voices,*" and celebrated the result in a public caption reading "*Cheers to another mission accomplished!*" Defendant's use of "*mission accomplished*" documents his own asserted objective (to produce an employment consequence), the use of collective force to achieve that objective ("*between Tizzy's post and my post*"), and his claimed success.

By referencing "*between Tizzy's post and my post,*" Defendant expressly situated himself alongside Defendant Randall Michael McWhorter and presented their combined publications as causally responsible for the harm to Plaintiff, including harm at work. Defendant made clear that this was coordinated activity, not isolated speech. He identified the target (Plaintiff's employment), identified the mechanism (public pressure on Bay Area Building Solutions), and identified the participants ("*you guys,*" "*Tizzy,*" "*my post*").

Defendant continued this pattern in subsequent videos, including on June 18, 2025 and June 30, 2025, in which he again referred to Plaintiff by name, again addressed Plaintiff in the second

person, and again described Plaintiff as unemployable, unstable, and dangerous. Defendant described Plaintiff as “*unemployed*,” claimed Plaintiff was “*committing crimes*,” and portrayed Plaintiff as someone who could not or should not remain employed. Defendant housed these videos in a playlist titled “*Temu Adam Sandler*,” a label he repeatedly applied to Plaintiff as an appearance-based insult, and used that playlist to direct viewers to a collected set of videos attacking Plaintiff’s character, employability, and professional status.

Immediately after Defendant’s June 15 and June 17 publications, Bay Area Building Solutions was subjected to an overwhelming wave of hostile interference, including fraudulent one-star reviews, harassing telephone calls, and social media attacks accusing the company of hiring racists and murderers. The content and structure of that harassment mirrors and repeats the same themes Defendant published on June 15, including that Plaintiff would “*gleefully run [people] over*” and that Bay Area Building Solutions employed him anyway. The push to flood the employer with reputational and economic pressure tracks the coordinated plans openly discussed in the top-response comments under Defendant’s June 15 video.

Bay Area Building Solutions then severed Plaintiff’s employment. Plaintiff was not terminated for his own conduct or statements. Plaintiff was terminated solely because the employer was subjected to overwhelming coordinated harassment, reputational pressure, and public accusations that were triggered, organized, and celebrated by Defendant’s publications.

Under Florida law, tortious interference with a business relationship requires: (1) the existence of a business relationship under which the plaintiff has legal rights; (2) the defendant’s knowledge of that relationship; (3) the defendant’s intentional and unjustified interference with that relationship; and (4) resulting damages. Here:

- Plaintiff’s employment with Bay Area Building Solutions was an ongoing economic relationship.
- Defendant acknowledged and targeted that relationship on June 15, 2025 by naming Bay Area Building Solutions on camera and asserting that Plaintiff’s continued employment was something the public should challenge.
- Defendant then coordinated and encouraged third-party intervention, publicly credited a multi-party “mission,” and celebrated the claimed success of that effort with statements such as *“Between Tizzy’s post and my post ... he’s gone,”* and *“another mission accomplished.”*
- Plaintiff’s employment was in fact terminated in the immediate aftermath, after Bay Area Building Solutions was subjected to the very campaign Defendant solicited and then publicly claimed credit for.

These facts support the conclusion that Defendant Tenenblatt did not simply speak about Plaintiff. He identified Plaintiff’s employment as the pressure point, enlisted others to attack it, publicly tracked the result as a joint objective, and then declared that objective completed.

**CAUSE OF ACTION FOR DEFAMATION BY IMPLICATION UNDER FLORIDA LAW
PREMISED UPON DEFENDANT TENENBLATT’S ONLINE CONDUCT**

Defendant Michael Shawn Tenenblatt constructed a defamatory mosaic through a series of meticulously edited social media productions designed to present Plaintiff as a violent, unstable, and disgraced individual. Across each publication—from June 15 through June 30, 2025—Defendant engaged in a deliberate editorial process involving *jump cuts, synchronized captions, imported imagery, and animated text overlays*, each selected and timed to convey the

same false message: that Plaintiff is a dangerous man who delights in violence, has lost his job, and is mentally unfit. The result was a continuous, multi-video narrative of character assassination built through cinematic devices and reinforced through repetition.

Defendant's June 15, 2025 publication marked the blueprint of this campaign. He manually layered Plaintiff's image and name with full-screen screenshots of Plaintiff's employer's website, interspersing those visuals with statements that Plaintiff would "*gleefully run [people] over with a car*" and "*post about it online to brag about it.*" By pairing those statements with the employer's charity and community materials, Defendant created a visual and rhetorical juxtaposition that implied Plaintiff had disgraced his company, jeopardized his employment, and embodied the opposite of the organization's values. The combination of editing, tone, and sequencing formed a digital indictment, persuading viewers that Plaintiff's professional life and moral integrity were incompatible with civilized standards.

Defendant's subsequent June 17 and June 18 videos expanded that defamatory framework into an ongoing storyline. Through green-screen backgrounds, visible watermarks of Plaintiff's former account, and phrases such as "*He's gone*" and "*mission accomplished*", Defendant portrayed Plaintiff's temporary account closure—prompted by a wave of harassment—as a self-inflicted collapse brought on by guilt and exposure. He declared, "*After what I'm sure was an eventful Monday morning at his job, if he still has one,*" inviting the audience to believe that Plaintiff's employer had taken disciplinary action. Defendant punctuated this narrative with performative pride—announcing, "*I am literally just the platform to amplify voices*"—thereby claiming shared victory in Plaintiff's professional destruction. The editorial choices—the fades, the captions, the cadence—were each instruments of implication, turning aesthetic control into a weapon of defamation.

Defendant's June 30, 2025 video escalated the attack into a grotesque caricature. Holding a microphone and performing an extended monologue, Defendant invoked a string of Adam Sandler film titles to frame Plaintiff as mentally unfit and professionally ruined. He accused Plaintiff of being "*unemployed, overconfident,*" and suffering a "*low-budget Temu Adam Sandler meltdown.*" The term "*Temu Adam Sandler*"—already a recurring device of ridicule—became the organizing principle of the monologue, binding together a chain of insinuations about Plaintiff's competence, mental state, and value as a person. The film references (*Happy Gilmore, Anger Management, Big Daddy, Grandma's Boy*) were not casual; they were deployed rhythmically to suggest that Plaintiff's existence itself was a failing comedy, reinforcing the defamatory image of instability and humiliation and acted as an extension of his obsession with *Temu Adam Sandler* proving malicious intent..

The editorial process behind these videos evidences actual malice. Defendant knew his depictions were false. He had direct awareness of Plaintiff's objection to the harassment and yet responded by escalating it—producing additional videos, reviving the *Temu Adam Sandler* label, and transforming the defamation into serialized content. The precision of his editing—his deliberate timing of text overlays, his insertion of résumé imagery, his cutting of Plaintiff's prior statements into mock performances—reflects a conscious decision to manipulate perception, not to inform. These were not impulsive remarks; they were directed acts of authorship executed with full awareness of their falsity and harm.

Through this sustained digital authorship, Defendant Tenenblatt arranged words, images, and performance into a single defamatory tableau that falsely portrayed Plaintiff as violent, mentally unwell, and professionally discredited. Each publication built upon the last, layering insinuation upon insinuation until the false image hardened into a public belief. This orchestration of

falsehood, grounded in Defendant's own editorial hand and carried out with malice, constitutes defamation by implication under Florida law.

VIII. STATEMENT OF FACTS REGARDING DEFENDANTS' FALSE STATEMENTS AND INJURY TO PLAINTIFF

159. Plaintiff's words did not indicate *premeditation* in any way, shape, or form. At no time has Plaintiff used language that could reasonably be interpreted as planning, intending, or desiring to commit a violent act. Plaintiff's statements contained no threats, no aggressive tone, and no references to criminal intent of any kind.

160. Plaintiff has never, in any medium or conversation, used, endorsed, or implied the phrases "*run over*," "*run down*," or any similar term describing physical harm toward another person. Plaintiff has never described, encouraged, or made light of violence involving vehicles, protests, or any form of physical confrontation.

161. Plaintiff has never at any time suggested, implied, or stated that it is lawful, acceptable, or justified to run over or harm peaceful protesters. Plaintiff has never expressed approval of violence, retaliation, or the use of force against any member of the public. Plaintiff has not advocated for, nor participated in, any physical action against demonstrators or political opponents.

- 162.** Plaintiff has never been involved in any violent act, traffic-related altercation, or protest-related incident of any kind. Plaintiff has never been arrested, cited, or questioned in connection with any public disturbance or event involving harm to others. There is no record, witness, or documentation linking Plaintiff to any act resembling violence or criminal behavior.
- 163.** Plaintiff's original video referred to a real Florida statute concerning roadway obstruction, debated and passed by the Florida Legislature, not a personal rule or fabricated mandate. Plaintiff's comments were limited to lawful discussion of public legislation and did not contain threats, advocacy of harm, or hostility toward any person or group.
- 164.** Plaintiff has never published or shared any content that could reasonably be construed as an endorsement of violence. Plaintiff's history of online activity, professional conduct, and public communication contains no threats, hate speech, or expressions of intent to harm others.
- 165.** Any online statements, videos, or posts associating Plaintiff with "*premeditation*," "*running down*," "*running over*," "*violence*," or "*criminal intent*" are false and represent direct replications of the narratives created and circulated through the Defendants' conduct.

- 166.** Plaintiff suffered economic harm as a result of the Defendants' conduct, including reputational injury that interfered with his employment, diminished client confidence, and caused professional disruption.
- 167.** Plaintiff experienced loss of sleep, anxiety, and emotional distress as a result of the Defendants' conduct, including ongoing harassment, targeted messages, and public hostility linked to the same false narratives.
- 168.** Plaintiff has received direct threats of physical harm and death as a result of the Defendants' conduct, including a mailed threat incorporating the same mocking language used in the online harassment campaign.
- 169.** Plaintiff received a wave of anonymous late-night phone calls from blocked or no-ID numbers as a result of the Defendants' conduct, creating ongoing fear and disturbance.
- 170.** Plaintiff's overall health, wellbeing, and sense of safety have been materially impacted as a result of the Defendants' conduct, which caused sustained stress, anxiety, and loss of rest.
- 171.** Plaintiff continues to experience emotional exhaustion, tension, and unease as a result of the Defendants' conduct and the continued public repetition of false narratives originally created and spread by them.

172. Plaintiff's statements are not compatible—legally, physically, or logically—with the concept of *premeditation*. The structure of Plaintiff's words was conditional, not declarative, and depended entirely on two separate and spontaneous external events: first, that an unlawful roadway obstruction would occur, and second, that such a blockade would specifically target or detain Plaintiff personally. Only under those circumstances—being unlawfully blocked and placed in danger—would the conditional portion of his statement even become relevant. Plaintiff's use of the word "*me*" reflected a personal threshold for danger, defining his own instinctive response to being trapped or surrounded, not an intent to act violently. That threshold is grounded in ordinary human instinct and common sense, as such an event would constitute an unlawful detention and a credible threat to safety under the laws of Florida. Plaintiff's statement therefore described a natural reflex of self-preservation in the face of an illegal act, not the planning or design of a future one. *Premeditation* requires forethought and conscious decision; spontaneity is immediate and unplanned. Plaintiff's words referenced the latter. In plain terms, one cannot plan to be unlawfully detained or *premeditate* an unforeseen act of self-defense. His statement was an expression of situational awareness and lawful caution, not aggression or intent to harm.

IX. STATEMENT OF FACTS REGARDING DEFENDANT DIGIVERSETECH LLC

173. On June 16, 2025, the Facebook page administered by Digiversetech LLC posted the identical video previously created and posted by Randall Michael McWhorter on June 14, 2025, at:

<https://www.facebook.com/watch/?v=1566195777670795&rdid=L2x3BnU8SXXKUIGoQ>.

174. The June 16, 2025 Facebook upload contained the same narration, visuals, and captions as the June 14, 2025 video, including the identification of Plaintiff by name and city.
175. Digiversetech LLC administers the “TizzyEnt” Facebook page that published the June 16, 2025 video.
176. The Michigan business registry lists the entity name as DIGIVERSETECH LLC.
177. The Michigan business registry lists the Identification # as 802848665.
178. The Michigan business registry lists the Jurisdiction as Michigan and the Entity Type as Domestic Limited Liability Company.
179. The Michigan business registry lists the Entity Status as Active and the AR Standing as Good.
180. The Michigan business registry lists the Initial Filing Date as 05/13/2022.

181. The Michigan business registry lists the Resident Agent Name as REGISTERED AGENTS INC.
182. The Michigan business registry lists the Registered Office Street Address as 2222 W. GRAND RIVER AVE., SUITE A, OKEMOS, MI 48864.
183. The Michigan business registry lists the Registered Office Mailing Address as 2785 E GRAND BLVD, 612, DETROIT, MI 48211.
184. The Michigan business registry lists the Management Type as Member.
185. The Michigan business search interface notes filings processed through 09/11/2025 and shows an AR Due Date field of 02/15/2024 for DIGIVERSETECH LLC.
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**A REPUBLISHER WHO DELIVERS, BROADCASTS, OR OTHERWISE
DISTRIBUTES A KNOWN DEFAMATORY STATEMENT IS EQUALLY LIABLE
UNDER RESTATEMENT § 578 AND FORMS A CAUSE OF ACTION UNDER
FLORIDA LAW**

Defendant Digiversetech LLC, acting as the administrative operator of the *TizzyEnt* Facebook page, participated directly in the commission, expansion, and continuation of the same wrongful conduct initiated by Defendant Randall Michael McWhorter. On June 16, 2025, this entity took affirmative steps to obtain, save, and reupload the identical defamatory video created and

published by McWhorter two days earlier. That act of republication was not passive, algorithmic, or incidental — it was a deliberate human act requiring conscious volition. Someone acting on behalf of Digiversetech LLC intentionally selected McWhorter’s file, uploaded it to the company’s Facebook account, and clicked “post.” In that moment, Digiversetech LLC transmitted McWhorter’s false statements across state lines from Michigan, where the company is incorporated and administratively controlled, into the State of Florida, where Plaintiff resides and where the injury occurred.

The June 16, 2025 upload contained every identical element of McWhorter’s original video: the same narration accusing Plaintiff of “premeditation,” the same on-screen identification of Plaintiff by name and city, and the same visual pairing of Plaintiff’s image with criminal implications. By republishing the identical content under its own digital credentials, Digiversetech LLC assumed full liability for the circulation, amplification, and ongoing distribution of the same falsehoods and harms caused by McWhorter’s original production. The law does not permit an entity to shield itself from accountability by functioning as a commercial conduit for defamatory or harassing material under the guise of a corporate brand.

Digiversetech LLC’s conduct was not incidental to platform mechanics; it was commercial in purpose and execution. The *TizzyEnt* Facebook page forms part of a unified network of monetized media accounts operated for visibility, engagement, and financial gain. By reproducing and republishing McWhorter’s video on Facebook — an entirely separate platform with its own audience — Digiversetech LLC expanded the geographic and demographic scope of the harm. It re-injected the false content into new distribution channels, re-igniting engagement and ensuring that Plaintiff’s name and image continued to circulate under the same false criminal framing.

The act of republication across state lines — from a Michigan-based corporate entity into a Florida resident’s community — constitutes a knowing and intentional transmission of harmful material into a foreign jurisdiction. That cross-border dissemination carries the same tortious character and effect as if the act had been committed within Florida itself. Every repeated publication of the same content reaffirms and compounds the injury, renewing the cause of action with each separate act of dissemination.

The corporate form of Digiversetech LLC does not insulate the individual actor behind it. The person who logged into the *TizzyEnt* Facebook account, selected the video file, and pressed “publish” committed an intentional act of participation in the same wrongful conduct already initiated by McWhorter. A limited liability company cannot serve as a disposable shell to absorb civil liability for deliberate misconduct carried out with full knowledge of its injurious effect. The digital fingerprints of that act — the saved file, the upload, and the timing of publication — establish that human intent and technical effort were required. The liability therefore attaches not only to the entity, but also to the individual who executed the act on its behalf.

Defendant Digiversetech LLC’s conduct demonstrates commercial malice: a calculated decision to increase visibility and traffic through outrage-based amplification, monetizing and perpetuating a false narrative about Plaintiff. By knowingly extending the reach of McWhorter’s original publication, the company participated in and profited from the same campaign of harm. The resulting transmission of reputational, emotional, and economic injury from Michigan into Florida constitutes an intentional tort executed through corporate channels and interstate communications. The law does not excuse such conduct, nor does it allow an entity or its agents to escape liability by silence, inaction, or dissolution. Accountability attaches to the act itself —

the moment a hand pressed “upload,” the harm was renewed, and the responsibility for it became permanent.

X. STATEMENT OF FACTS REGARDING PLAINTIFF NOT BEING A PUBLIC FIGURE OR CENTER OF CONTROVERSY

186. Plaintiff is not a public figure, limited-purpose public figure, or participant in any public controversy of any kind, at any time, in any jurisdiction, or in any medium. Prior to the content at issue, Plaintiff maintained a private life and had no substantial online presence, media attention, or involvement in matters of public interest. The emergence of Plaintiff’s name, image, and speech into viral circulation occurred solely and entirely as a result of Defendant Randall Michael McWhorter’s actions on June 14, 2025, when McWhorter unilaterally selected Plaintiff’s video content, attached Plaintiff’s name and city, and threatened to “*make it real, real, real public.*” Defendant McWhorter explicitly stated that he only encountered Plaintiff’s content because Plaintiff had followed him on TikTok and that the algorithm surfaced Plaintiff’s video as a result of that follow: “*I only saw your video, Travess, because your dumbass follows me. And the algorithm went, maybe you want to see this because this person follows you, so maybe you’ll like them. I don’t. But here you are.*” Plaintiff’s statements were not directed toward political discourse or public commentary; they were simple conditional statements reflecting his personal threshold for self-defense under Florida law — a reference to lawful self-preservation if faced with an unlawful and dangerous roadway obstruction. Defendant McWhorter manufactured the controversy entirely on his own initiative by mischaracterizing Plaintiff’s words, reframing them as violent intent, and broadcasting them to millions of viewers. The viral attention that followed

was the product of McWhorter's decision to transform a non-controversial personal statement into a weaponized narrative for public outrage. At no time did Plaintiff seek, invite, or provoke public engagement. The resulting exposure, harassment, and reputational harm were wholly derivative of McWhorter's editing, narration, and threat to amplify Plaintiff's identity for mass visibility.

187. On June 15, 2025, Defendant Michael Shawn Tenenblatt posted a video in which he juxtaposed Plaintiff's name, image, and statements with imagery taken from Plaintiff's employer's website and professional branding. The false implication presented in that video connected Plaintiff's alleged statements with his workplace in an effort to embarrass and isolate him professionally. Within the comment thread of that June 15 video, Defendant Tenenblatt replied, "*Between @tizzyent's post and my video it's over 300,000 views about Travess, y'all are definitely doing your part to make it happen.*" This remark acknowledged the combined reach of his and McWhorter's coordinated publications, emphasizing the joint creation of visibility around Plaintiff's name. The phrase "*mission accomplished*" appeared in conjunction with this commentary, marking a celebratory acknowledgment of the results of that exposure — harassment directed toward Plaintiff and interference with his employment. These statements confirm that the virality of content involving Plaintiff was not spontaneous or self-generated but the deliberate outcome of Defendants McWhorter and Tenenblatt's collaborative efforts. Plaintiff's visibility arose exclusively from the defendants' production, framing, and coordinated amplification. Nothing said by Plaintiff was controversial in itself, nor was it the source of public debate. The public reaction that ensued was not a reaction to Plaintiff's own words, but to the Defendants' manipulated presentations of them. Plaintiff is not, and never was, a public figure or

subject of legitimate public controversy; the Defendants created the appearance of one through deliberate and repeated misrepresentation.

188. Plaintiff remains in ongoing and reasonable fear as a result of Defendant Randall Michael McWhorter’s explicit and continuing threat: *“If you’re going to have stupid fucking shitty takes like this, I’m going to make it real, real, real public for you.”* The wording of this statement was not confined to a single moment or a one-time event. It described an ongoing condition — a standing threat tied to any future speech by Plaintiff that Defendant McWhorter might personally deem objectionable. The phrase *“I’m going to make it real, real, real public for you”* was directed in the second person, stated as an action Defendant McWhorter would personally take against Plaintiff in the event Plaintiff expressed opinions or statements he considered *“stupid”* or *“shitty.”* The context of that threat carries continued weight because Defendant McWhorter’s audience — the *“public”* to which he refers — is not a neutral or ordinary audience. It is a highly engaged and reactive network of social media followers known to coordinate contact with employers, leave fraudulent reviews, and engage in harassment against individuals featured in Defendant McWhorter’s videos.

Plaintiff’s fear of this *“real, real, real public”* remains active and justified. The threat was not abstract or rhetorical; it was specific, conditional, and open-ended, linked to Plaintiff’s ongoing right to speak or express himself online. Plaintiff understands that any future act of expression, even lawful or benign, carries the risk of being re-amplified by Defendant McWhorter to an audience predisposed to hostility and aggression. The fear is not speculative but grounded in experience — Plaintiff has already endured harassment, reputational injury, and targeted interference with his employment as a result of this same audience’s conduct following McWhorter’s earlier publications. Because Defendant McWhorter’s videos about Plaintiff

remain publicly accessible on multiple platforms, the condition of threat persists each day. The language used — *“I’m going to make it real, real, real public for you”* — establishes an indefinite and continuing danger tied to Plaintiff’s future speech. The fear experienced by Plaintiff is ongoing and rational, derived from a demonstrated pattern of behavior by Defendant McWhorter and the reactionary conduct of the audience he commands.

**EACH PARTICIPANT IN A COMMON DESIGN TO COMMIT AN INTENTIONAL
TORT BEARS FULL LIABILITY AND FORMS A CAUSE OF ACTION UNDER
FLORIDA LAW**

Florida law recognizes that when two or more individuals or entities act together in furtherance of a shared plan or understanding to cause harm, each participant is responsible for the actions of the others committed in pursuit of that plan. Florida law recognizes that conspiracies need not be formal or written agreements—they may be inferred from conduct, language, repetition, and coordinated acts producing a single injurious outcome. Florida law recognizes that liability in such a conspiracy extends jointly to all participants, whether their role is to originate, amplify, or distribute the wrongful material.

The large body of evidence collected by Plaintiff establishes a deliberate and ongoing common design among Defendants Randall Michael McWhorter, Michael Shawn Tenenblatt, and Digiversetech LLC. Each acted as a distinct but integrated component in a coordinated network of publication, amplification, and republication aimed at destroying Plaintiff’s reputation, disrupting his employment, and subjecting him to continuous harassment. Defendant McWhorter created the originating falsehood—that Plaintiff’s lawful conditional statement about

self-preservation “*indicated premeditation*”—and embedded that falsehood within an explicit extortionate threat: “*If you’re going to have stupid fucking shitty takes like this, I’m going to make it real, real, real public for you.*” Defendant Tenenblatt followed immediately after, producing videos that carried forward the same theme, merging McWhorter’s narrative with employer imagery, and positioning himself as a direct intermediary between McWhorter and the downstream audience who would perpetuate the attack. Defendant Digiversetech LLC, operating as the administrative body behind the *TizzyEnt* Facebook page, republished McWhorter’s identical video across state lines, ensuring that the same defamatory content was transmitted anew to Florida-based viewers and permanently preserved in circulation.

Florida law recognizes that a conspiracy is established when multiple actors function as a unified mechanism toward a shared objective. Here, Defendant McWhorter set the false narrative in motion, Defendant Tenenblatt nurtured and expanded it, and Defendant Digiversetech LLC ensured its continued life through republication. The relationship between these acts is linear and deliberate—a chain of conduct designed to maintain public hostility and ensure the continuity of harm.

The conspiracy is not merely inferred from timing or similarity of content; it is visible within the very ecosystems of the defendants’ comment threads. These comment sections function as self-contained extensions of the conspiracy—digital arenas where followers echo and mutate the defendants’ core falsehoods into sub-themes of employer harassment, appearance-based mockery, false criminal accusations, and targeted surveillance. The “*premeditation*” lie seeded by Defendant McWhorter appears throughout these threads like a contagion, replicated again and again as if algorithmically programmed. In Defendant Tenenblatt’s comment sections, the same pattern repeats: viewers recycle McWhorter’s false language, use the same imagery, and

reinforce the same narrative. Each new repetition is a symptom of the original design. Florida law recognizes that when such replication occurs as a foreseeable and natural result of joint misconduct, every conspirator shares full responsibility for the outcome.

Defendant Tenenblatt's own words identify his knowing participation in that plan. In his June 15, 2025 video comment thread, beneath the same post where he displayed Plaintiff's employer imagery and name, Defendant Tenenblatt wrote: "*Between @tizzyent's post and my video, it's over 300,000 views about Travess, y'all are definitely doing your part to make it happen.*" This statement is not commentary—it is confession. It demonstrates that Defendant Tenenblatt saw himself as the operational bridge between McWhorter's upstream fabrication and the downstream conduct of the public McWhorter summoned. His caption—"mission accomplished"—defines his state of mind and role: a mission, by definition, is a coordinated and premeditated act performed toward an intended result. Here, that result was the harassment, humiliation, and economic destruction of Plaintiff. Tenenblatt nurtured his comment threads as extensions of McWhorter's original threat—spaces where the "*premeditation*" falsehood spread like locusts, self-replicating under his supervision and reinforcement.

Defendant Digiversetech LLC's conduct completes the circuit of liability. By manually uploading McWhorter's identical video to the *TizzyEnt* Facebook page from Michigan, the entity acted as a corporate distributor of the same wrongful material, renewing the harm and extending it across state boundaries. Florida law recognizes that republication of defamatory or harassing content constitutes a new act of wrongdoing, and one who republishes assumes responsibility for the original act's intent and effect. Each republication by Digiversetech LLC was an overt act in furtherance of the same conspiracy—an intentional continuation of McWhorter's and Tenenblatt's coordinated scheme to sustain the false narrative and prolong Plaintiff's exposure.

The evidence of this conspiracy is not abstract; it is documented across multiple platforms, recorded in the defendants' own words, and mirrored by the digital behavior of their audiences. The "*premeditation*" falsehood serves as the unifying signal of this design—originating with McWhorter, magnified by Tenenblatt, and distributed by Digiversetech LLC. Florida law recognizes that when multiple parties act with a shared objective to harm another, the law imposes joint and several liability for every resulting injury. Each defendant here played a deliberate role in the propagation of the same coordinated falsehood. The harm—economic, emotional, reputational, and enduring—is not divisible, because neither was their plan.

**DEFENDANTS' EXTREME AND OUTRAGEOUS CONDUCT INTENTIONALLY
CAUSED SEVERE EMOTIONAL DISTRESS TO PLAINTIFF IN VIOLATION OF
FLORIDA LAW**

Under Florida law, intentional infliction of emotional distress arises when a defendant, through deliberate and outrageous conduct, causes severe mental and emotional suffering that no reasonable person should be expected to endure. The conduct at issue here was neither isolated nor impulsive. It was calculated, repeated, and amplified through digital platforms designed to magnify harm at scale.

After Defendant Randall Michael McWhorter republished his defamatory video to Instagram, Plaintiff's dormant account was inundated with messages from strangers who had never met him but now possessed his name, location, and employment information. The volume of communications was extraordinary and hostile, reflecting a coordinated influx of harassment triggered by the defendants' publications. Within the same period, Plaintiff received a text

message from an unidentified sender who referenced the street where Plaintiff resides, confirming that his personal safety had been compromised. From that moment forward, Plaintiff's day-to-day life became characterized by constant anxiety and fear for his safety.

The harassment did not end with messages. It expanded into Plaintiff's physical reality. Defendants' followers placed malicious and false calls to law-enforcement agencies, reporting fabricated claims about Plaintiff in an effort to cause him legal harm and humiliation. Plaintiff has received multiple direct, graphic, and documented death threats, including at least one threat that has been formally reported to and is under investigation by the Federal Bureau of Investigation. Each threat reinforced the reality that the defendants' digital conduct had translated into tangible, ongoing danger in Plaintiff's everyday life.

The cumulative impact of this conduct has been severe. Plaintiff has suffered continuous anxiety, stress, and emotional exhaustion. He experiences recurring sleeplessness, loss of appetite, and difficulty concentrating at work. His ordinary routines have been disrupted by the constant need to monitor his surroundings, document threats, and respond to harassment. What was once normal daily life has been replaced by vigilance, fear, and the loss of peace of mind. Plaintiff worries regularly that his home will be vandalized or that he may be confronted in public by one of the individuals incited by the defendants' publications.

Each time the defamatory videos reappear through platform algorithms or are rediscovered by new audiences, the harassment renews itself. The Plaintiff's emotional distress is not confined to a single incident—it is continuously revived through automated resurfacing, comment threads, and ongoing republication. These digital systems, designed to maximize engagement, have

ensured that the damage inflicted upon Plaintiff remains active, forcing him to relive the anxiety, fear, and humiliation originally set in motion by the defendants' acts.

Defendant Michael Shawn Tenenblatt exacerbated the distress by producing additional videos under the "*Temu Adam Sandler*" label, combining mockery, false criminal insinuations, and targeted references to Plaintiff's employment. Defendant Digiversetech LLC republished the same defamatory material to Facebook, adding new layers of visibility and commentary. Each republication reignited the harassment, extending the emotional injury through new audiences and new waves of threats.

Under Florida law, conduct that intentionally subjects a person to prolonged psychological torment—through false statements, targeted harassment, and knowing amplification of harm—meets and exceeds the standard for extreme and outrageous behavior. The defendants' actions deprived Plaintiff of security, privacy, and peace of mind. They inflicted lasting emotional trauma that continues to this day, reinforced by the same technological systems that the defendants used to spread their falsehoods.

The defendants' coordinated conduct was intentional, malicious, and reckless with respect to its consequences. It served no legitimate purpose and violated every principle of decency recognized under Florida law. The ongoing anxiety, stress, fear, sleeplessness, and disruption of Plaintiff's normal life form a direct, documented, and continuing injury that establishes a complete cause of action for intentional infliction of emotional distress.

**COMPLIANCE WITH FLORIDA RULES OF CIVIL PROCEDURE (RULES 1.110(b),
1.190(a), AND 1.210(a))**

Plaintiff, Travess Matthew Wolford, files this Amended Complaint pursuant to **Rule 1.190(a)**, Florida Rules of Civil Procedure, which authorizes amendment of pleadings to ensure that all issues arising from the same operative facts may be fully and fairly adjudicated.

This filing is made in good faith to add necessary parties and causes of action arising from an identical factual nucleus, and to ensure complete determination of all controversies in a single proceeding.

Pursuant to **Rule 1.210(a)**, all persons may be joined in one action as defendants when relief is asserted against them jointly, severally, or in the alternative, and when such relief arises out of the same transaction, occurrence, or series of transactions or occurrences.

The Defendants named herein—Randall Michael McWhorter, Michael Shawn Tenenblatt, and Digiversetech LLC—are properly joined because the claims against each arise from a continuous, unified course of conduct directed at Plaintiff through overlapping digital publications, republications, and coordinated online actions forming a single chain of events and producing a single, indivisible injury.

All allegations contained in this Amended Complaint are set forth in conformity with **Rule 1.110(b)**, which requires a short and plain statement of the ultimate facts showing that the pleader is entitled to relief.

Each Count that follows articulates a distinct, legally recognized cause of action under Florida law supported by ultimate factual allegations and a clear statement of the relief sought.

The conduct alleged herein arises out of a continuing and unified course of conduct that began on or about June 14, 2025, and continues in perpetuity for as long as the defamatory, harassing, and injurious publications and republications created, endorsed, or distributed by Defendants remain live, accessible, or discoverable through social-media platforms, algorithmic indexing, or republication by downstream audiences.

Each day that these materials remain active constitutes a fresh act of harm, renewing the emotional distress, reputational injury, and economic disruption inflicted upon Plaintiff.

Accordingly, the causes of action asserted herein are continuing torts, giving rise to ongoing damages and warranting both monetary and injunctive relief to prevent further injury.

This Amended Complaint is filed to ensure procedural completeness, to join all necessary parties under the governing rules, and to preserve Plaintiff's right to a full adjudication on the merits of each claim arising from Defendants' coordinated and ongoing acts.

COUNT I

CYBERSTALKING UNDER § 784.048(1)(d) AND § 784.0485, FLA. STAT., ESTABLISHED AGAINST DEFENDANTS RANDALL MICHAEL McWHORTER AND DIGIVERSETECH LLC (JOINT AND SEVERAL LIABILITY)

1. Plaintiff re avers and incorporates by reference paragraphs 15 through 18 and 23 through 43 and 173 through 174 of this Complaint as if fully set forth herein.
2. As alleged in the incorporated paragraphs, Defendant Randall Michael McWhorter ("McWhorter") and Defendant Digiversetech LLC ("Digiversetech") engaged in a willful,

malicious, and repeated course of electronic communications directed at Plaintiff through multiple public social-media platforms, including TikTok, Instagram, X (Twitter), YouTube, and Facebook.

3. On June 14, 2025, McWhorter created and published a video naming Plaintiff Travess Matthew Welford and identifying his city, St. Petersburg, Florida. The video contained the statements “*If any incidents happen in St. Petersburg, Florida, Travess Matthew Welford might be someone you want to look at about that*” and “*If you're going to have stupid fucking shitty takes like this, I'm going to make it real, real, real public for you.*” The latter statement constituted a direct threat to make Plaintiff the target of orchestrated public exposure and humiliation.

4. McWhorter intentionally republished the same video to at least three additional platforms—Instagram, X, and YouTube—each republication constituting a distinct electronic communication under § 784.048(1)(d), Fla. Stat.

5. On June 16, 2025, Defendant Digiversetech LLC further republished the identical video on the “TizzyEnt” Facebook page that it administers, repeating the same statements about Plaintiff and thereby continuing the same course of harassing communications.

6. Each act of publication and republication described above was undertaken voluntarily and deliberately, serving no legitimate purpose of news, commentary, or civic discourse, but rather to expose Plaintiff to ridicule, threats, and reputational destruction.

7. The cumulative conduct of McWhorter and Digiversetech LLC constitutes a *course of conduct* within the meaning of § 784.048(1)(d), Fla. Stat., because the repeated electronic

communications were directed at a specific person, were willful and malicious, and would cause—and did cause—a reasonable person substantial emotional distress.

8. Plaintiff experienced the resulting contact and its effects in Pinellas County, Florida, where he resides, satisfying the venue and jurisdictional requirements of § 784.0485.

9. By reason of the foregoing acts, Defendants McWhorter and Digiversetech LLC committed cyberstalking in violation of § 784.048(1)(d), Fla. Stat., and Plaintiff is entitled to statutory and common-law relief, including injunctive relief under § 784.0485.

WHEREFORE, Plaintiff respectfully demands that this honorable Court enter judgment against Defendants **Randall Michael McWhorter** and **Digiversetech LLC**, jointly and severally, and award the following relief:

a. An order requiring Defendants to immediately remove, delete, and permanently disable public access to all videos, posts, comments, or derivative publications containing Plaintiff's name, image, likeness, or geographic identifiers that were created, published, or republished in whole or in part as described in paragraphs 15 through 18 and 23 through 43 and 173 through 174 of this Complaint;

b. A permanent injunction pursuant to § 784.0485, Fla. Stat., prohibiting Defendants and all persons acting in concert with them from engaging in any further direct or indirect electronic communications concerning or directed to Plaintiff;

c. Compensatory damages for emotional distress, reputational injury, and economic loss proximately caused by Defendants' willful and malicious conduct;

- d. Punitive damages to punish and deter Defendants' deliberate and malicious cyberstalking;
- e. Costs of this action, including filing fees and service expenses; and
- f. Such other and further relief as this Court deems just and proper.

COUNT II

CYBERSTALKING UNDER § 784.048(1)(d) AND § 784.0485, FLA. STAT., ESTABLISHED AGAINST DEFENDANT MICHAEL SHAWN TENENBLATT (INDIVIDUAL LIABILITY)

1. Plaintiff re avers and incorporates by reference paragraphs 44 through 158 of this Complaint as if fully set forth herein.
2. As alleged in the incorporated paragraphs, Defendant Michael Shawn Tenenblatt ("Tenenblatt") engaged in a willful, malicious, and repeated course of electronic communications directed at Plaintiff through his public TikTok account, operating under the handle **@floridian_druid**, and through derivative republications organized in a playlist titled **"Temu Adam Sandler."**
3. Beginning on June 15, 2025, and continuing through at least June 30, 2025, Defendant Tenenblatt published four separate videos naming Plaintiff, displaying Plaintiff's likeness, referencing Plaintiff's geographic location, and pairing those identifiers with false and disparaging statements regarding Plaintiff's character, mental health, and employment.
4. Each publication referenced Plaintiff directly by name or by a recurring nickname ("Temu Adam Sandler") that Defendant Tenenblatt adopted from audience commentary on prior

defamatory content. Each video further addressed Plaintiff in the second person, using statements such as “*Travess, you messed up*” and “*What do you think you did, Travess*”, constituting unwanted direct communications.

5. Defendant Tenenblatt deliberately imported and overlaid imagery obtained from Plaintiff’s employer’s website, Plaintiff’s social-media accounts, and unrelated employees and community materials, thereby pairing Plaintiff’s personal identity and workplace with defamatory narratives asserting that Plaintiff would “gleefully run people over with a car” and “brag about it online.”

6. Each publication was manually edited and produced with sequential overlays, synchronized captions, jump cuts, and inserted images—actions demonstrating intentional design and repetition sufficient to satisfy the *course of conduct* element of § 784.048(1)(d), Fla. Stat.

7. Defendant Tenenblatt’s publications served no legitimate purpose and were intended to publicly shame, alarm, and emotionally distress Plaintiff by misrepresenting his statements, attaching false criminal connotations, and encouraging public hostility and interference with Plaintiff’s employment.

8. The repeated publications, direct addresses, and continued accessibility of the “Temu Adam Sandler” playlist constitute willful and malicious cyberstalking within the meaning of § 784.048(1)(d), Fla. Stat., and warrant injunctive relief under § 784.0485.

9. As a direct and proximate result of Defendant Tenenblatt’s conduct, Plaintiff has suffered substantial emotional distress, reputational injury, and economic harm.

10. Where defendants statements were displayed visually with an animated text overlay which types their spoken words in parallel it constitutes a separate distinct act of unwanted

communications and compounds injury through duplicative communications spoken directly to Plaintiff that serve no good purpose.

WHEREFORE, Plaintiff respectfully demands that this honorable Court enter judgment against **Defendant Michael Shawn Tenenblatt** and award the following relief:

- a. An order requiring Defendant Tenenblatt to immediately remove, delete, and permanently disable public access to all videos, posts, playlists, or derivative publications containing Plaintiff's name, image, likeness, or geographic identifiers that were created, published, or republished in whole or in part as described in paragraphs 44 through 158 of this Complaint;
- b. A permanent injunction pursuant to § 784.0485, Fla. Stat., prohibiting Defendant Tenenblatt and all persons acting in concert with him from engaging in any further direct or indirect electronic communications concerning or directed to Plaintiff;
- c. Compensatory damages for emotional distress, reputational injury, and economic loss proximately caused by Defendant Tenenblatt's willful and malicious conduct;
- d. Punitive damages to punish and deter Defendant Tenenblatt's deliberate and malicious cyberstalking;
- e. Costs of this action, including filing fees and service expenses; and
- f. Such other and further relief as this Court deems just and proper.

COUNT III

**DEFAMATION PER SE UNDER FLORIDA LAW — JOINT AND SEVERAL
LIABILITY OF DEFENDANTS RANDALL MICHAEL McWHORTER,
DIGIVERSETECH LLC, AND MICHAEL SHAWN TENENBLATT**

1. Plaintiff re avers and incorporates by reference paragraphs 15, 44, 98, 116, 136, and 173–174 of this Complaint as if fully set forth herein.
2. As alleged in the incorporated facts, Defendants Randall Michael McWhorter, Digiversetech LLC, and Michael Shawn Tenenblatt each published or republished false statements of fact identifying Plaintiff Travess Matthew Wolford by name, likeness, and city, imputing to him criminal intent, violent conduct, and professional unfitness.
3. On June 14, 2025, Defendant McWhorter published a video identifying Plaintiff by name and city, containing the following statements:

“Cool story, bro. Here’s the thing. Even setting aside the fact that I don’t think that Ron DeSantis’ little mandate holds up under real-world conditions, within his mandate, the scenario has to be like you’re driving, you’re surrounded by people, you feel unsafe, and have to drive away. And your little video here eliminates that. This indicates premeditation. Seems to indicate that this is something that you want to do and might seek out doing. So, if you want to try and do that, you can go ahead and fucking throw your life away. I’d be okay with that part. But hey, just in case there are any incidents in or around St. Petersburg, Florida, Travess Matthew Wolford might be someone that you want to look at about that. And now for the public service announcement portion of this. I only saw your video, Travess, because your dumbass follows me. And the algorithm went, maybe you want to see this because this person follows you, so maybe you’ll like them. I don’t. But here you are. So, if you don’t like me, don’t hate-follow me, because

if you're going to have stupid fucking shitty takes like this, I'm going to make it real, real, real public for you."

4. On June 15, 2025, Defendant Tenenblatt published a video identifying Plaintiff by name and employer, containing the following statements:

"Ladies and gentlemen, meet who the internet has dubbed Temu Adam Sandler, or what we're going to affectionately call him, Travess Matthew Welford. You see, Travess here, like other MAGA creators, thinks it's funny to get on the internet and spread misinformation that you can just run over peaceful protesters that are standing in the road with your car. Well, Travess, I wonder if that mentality matches with your employer, Bay Area Building Solutions. I think all the people of Tampa Bay, liberal or not, should know the person that's being hired to build their buildings would gleefully run them over with a car and then post about it online to brag about it. None of these seem to align with your company's culture, which is providing the optimum environment for those employees to best serve our clients, who is dedicated to improving the communities in which we live. Travess, you messed up."

5. On June 17, 2025, Defendant Tenenblatt published another video, containing the following statements:

"We have an update on Travess. Sorry, I'm not in my normal get-up, but it was just too exciting. I had to let you guys know. After posting consecutive posts on Sunday night about how liberals going after him aren't going to do anything, and between Tizzy's post and my post, ladies and gentlemen, I am proud to announce... He's gone. After what I'm sure was an eventful Monday morning at his job, if he still has one, guess the outrage admin couldn't handle all the outrage. And it's all thanks to you guys. I am literally just the platform to amplify voices. I couldn't do

what I do without your help. Let's keep up the good fight, guys. Never stay silent. Never back down."

6. On June 18, 2025, Defendant Tenenblatt published another video containing the following statements:

"Looks we got Unhappy Gilmore."

"I wasn't aware that committing crimes was political."

"If this is true, I absolutely condemn it and don't condone this kind of behavior at all."

"But what do you think you did? That's the whole reason the video was made about you, Travess. So instead of starting a campaign of, oh, I'm the victim and I'm being canceled, why don't you take responsibility for the things you put out in the public forum? But you won't."

7. On June 30, 2025, Defendant Tenenblatt published another video, containing the following statements:

"Have you been following one of the most entertaining MAGA dumpster-fire FAFO stories of the summer? No? Let me catch you up to speed."

"You see, Travess here did a real airhead thing. He jumped on a MAGA trend and claimed that a protester merely blocking his way gave him the right to plow right through them."

"Travess could have taken the grown-up route and not been an Unhappy Gilmore, accepted the consequences of his dirty work, but instead he's made his entire personality just one long episode of Anger Management (2003). Except, instead of seeking therapy, he's become a regular Grandma's Boy (2006) and is currently threatening to sue anyone who comments on his public profiles."

"Travess, the self-appointed Big Daddy (1999) of Chat GPT defamation lawsuits, patrolling the internet like The Cobbler (2014), trying to squeeze his crusty, unemployed foot into the polished

shoe of a legal mastermind. And shocker — it doesn't fit."

"So the moral of the story? Don't be Travess. Or do, if you like being unemployed, overconfident, and staring into your own personal low-budget Temu Adam Sandler meltdown."

8. On June 16, 2025, Defendant Digiversetech LLC, through the "TizzyEnt" Facebook page it administers, republished the identical video previously created and posted by Defendant McWhorter on June 14, 2025. The Facebook upload contained the same narration, visuals, and captions, including the identification of Plaintiff by name and city.

9. Some or all of the statements described above was presented in *two distinct forms*: spoken verbally by the Defendants in their videos, and simultaneously displayed as *animated text overlays* that typed the same defamatory language in written form on screen. Each dual-format publication therefore constituted separate and independent defamatory acts—*slander per se* for the spoken words and *libel per se* for the written text overlays—each representing a distinct republication and distinct injury.

10. The statements published and republished by all Defendants are false and were made with knowledge of their falsity or reckless disregard for the truth.

11. The statements falsely impute to Plaintiff criminal intent and conduct, including *premeditation, running over peaceful protesters, and committing crimes*, while further asserting that Plaintiff is *unemployed, overconfident*, and engaged in a *low-budget meltdown*.

12. The publications constitute defamation per se under Florida law because they (a) charge Plaintiff with crimes involving moral turpitude, (b) injure Plaintiff in his trade and profession, and (c) expose Plaintiff to public hatred, contempt, ridicule, and disgrace.

13. As a direct and proximate result of the Defendants' joint and several actions, Plaintiff has suffered presumed and actual damages, including emotional distress, reputational harm, and economic loss.

WHEREFORE, Plaintiff respectfully demands that this honorable Court enter judgment against **Defendants Randall Michael McWhorter, Digiversetech LLC, and Michael Shawn Tenenblatt**, jointly and severally, and award the following relief:

- a.** An order requiring Defendants to immediately remove, delete, and permanently disable public access to all videos, posts, playlists, and derivative publications containing the false statements set forth in this Count.
- b.** A permanent injunction prohibiting Defendants and all persons acting in concert with them from publishing, republishing, or amplifying any statements or imagery falsely depicting Plaintiff as criminal, violent, or professionally unfit.
- c.** General and special damages, including presumed damages for defamation per se and damages for emotional distress, reputational injury, and economic loss.
- d.** Punitive damages to punish and deter Defendants' willful and malicious misconduct.
- e.** Costs of this action, including filing fees and service expenses.
- f.** Such other and further relief as the Court deems just and proper.

COUNT IV

DEFAMATION BY IMPLICATION UNDER FLORIDA LAW — JOINT AND SEVERAL LIABILITY OF DEFENDANTS RANDALL MICHAEL McWHORTER, DIGIVERSETECH LLC, AND MICHAEL SHAWN TENENBLATT

1. Plaintiff re avers and incorporates by reference paragraphs 15, 44, 98, 116, 136, and 173–174 of this Complaint as if fully set forth herein.
2. As alleged in the incorporated facts, Defendants Randall Michael McWhorter, Digiversetech LLC, and Michael Shawn Tenenblatt each created, published, or republished statements and imagery that, when viewed in context, conveyed false and defamatory implications about Plaintiff Travess Matthew Wolford that extended beyond the literal words used.
3. On June 14, 2025, Defendant McWhorter published a video combining Plaintiff’s lawful expression with McWhorter’s commentary, including *This indicates premeditation* and *Travess Matthew Wolford might be someone that you want to look at about that*. Through deliberate sequencing, narration, and tone, Defendant McWhorter implied that Plaintiff had engaged in or intended to commit criminal acts of premeditated vehicular violence and should be investigated for such conduct.
4. On June 15, 2025, Defendant Tenenblatt published a video stating *Travess here, like other MAGA creators, thinks it’s funny to get on the internet and spread misinformation that you can just run over peaceful protesters that are standing in the road with your car*. By juxtaposing these words with imagery from Plaintiff’s employer’s website, Defendant Tenenblatt implied that

Plaintiff's alleged mindset was real, that Plaintiff's employer was complicit or negligent, and that Plaintiff was unfit to work in the construction industry or to serve the Tampa Bay community.

5. In the same video, Defendant Tenenblatt further stated *the person that's being hired to build their buildings would gleefully run them over with a car and then post about it online to brag about it*, implying that Plaintiff had already engaged in or intended to engage in such criminal acts and that his employer had retained him despite knowing this risk.

6. On June 17, 2025, Defendant Tenenblatt stated *He's gone ... if he still has one and It's all thanks to you guys. I am literally just the platform to amplify voices*. In context, these statements implied that coordinated online harassment of Plaintiff was justified and successful, that Plaintiff had lost his job as a result of his supposed misconduct, and that such harm was an appropriate public outcome.

7. On June 18, 2025, Defendant Tenenblatt stated *I wasn't aware that committing crimes was political and why don't you take responsibility for the things you put out in the public forum?* These statements implied that Plaintiff had committed crimes and refused accountability, creating the false impression of guilt for nonexistent criminal acts.

8. On June 30, 2025, Defendant Tenenblatt stated *Travess, the self-appointed Big Daddy of Chat GPT defamation lawsuits, patrolling the internet like The Cobbler, trying to squeeze his crusty, unemployed foot into the polished shoe of a legal mastermind. And shocker — it doesn't fit. So the moral of the story? Don't be Travess. Or do, if you like being unemployed, overconfident, and staring into your own personal low-budget Temu Adam Sandler meltdown*. These statements implied that Plaintiff was mentally unstable, unemployable, and the subject of

public humiliation, even though Plaintiff was and remains a full-time professional in the construction industry.

9. On June 16, 2025, Defendant Digiversetech LLC, through the “TizzyEnt” Facebook page it administers, republished the identical video created by Defendant McWhorter, maintaining the same captions, narration, and visuals that implied Plaintiff’s predisposition toward violence and criminal conduct.

10. Each of the statements described above was presented in *two distinct forms*: spoken verbally by the Defendants in their videos, and simultaneously displayed as *animated text overlays* that typed the same defamatory language in written form on screen. Each dual-format publication therefore constituted separate and independent defamatory acts—*slander by implication* for the spoken words and *libel by implication* for the written text overlays—each representing a distinct republication and distinct injury.

11. Through the selective editing, sequencing, and narration of Plaintiff’s image and words, Defendants arranged and published material that falsely implied Plaintiff advocated, condoned, or planned criminal violence, that he was a danger to others, and that his employer’s reputation was compromised by his alleged conduct.

12. These implications are false, were known to be false when published, and were intended to lead viewers to draw false conclusions about Plaintiff’s character, morality, and professional integrity.

13. Defendants' coordinated use of repetition, mocking labels such as *Temu Adam Sandler*, and appeals to audience action implied collective justification for harassment and retaliation, causing reputational and emotional injury.

14. The statements and their implied meanings constitute defamation by implication under Florida law because, through context and innuendo, they convey false and defamatory impressions that (a) Plaintiff committed criminal acts, (b) Plaintiff was unfit for his profession, and (c) Plaintiff was deserving of community hostility and ridicule.

15. As a direct and proximate result of Defendants' joint and several conduct, Plaintiff has suffered and continues to suffer presumed and actual damages including reputational destruction, emotional distress, and economic harm.

WHEREFORE, Plaintiff respectfully demands that this honorable Court enter judgment against Defendants **Randall Michael McWhorter, Digiversetech LLC, and Michael Shawn Tenenblatt**, jointly and severally, and award the following relief:

a. An order requiring Defendants to immediately remove, delete, and permanently disable public access to all videos, posts, playlists, and derivative publications containing the statements and imagery giving rise to the false implications set forth in this Count.

b. A permanent injunction prohibiting Defendants and all persons acting in concert with them from publishing, republishing, or amplifying any content that, directly or implicitly, associates Plaintiff with criminal, violent, or unethical conduct.

c. General and special damages, including presumed damages for defamation by implication and damages for emotional distress, reputational injury, and economic loss.

- d. Punitive damages to punish and deter Defendants' willful and malicious misconduct.
 - e. Costs of this action, including filing fees and service expenses.
 - f. Such other and further relief as the Court deems just and proper.
-

COUNT V

TORTIOUS INTERFERENCE WITH EMPLOYMENT RELATIONSHIP (AGAINST RANDALL MICHAEL McWHORTER, MICHAEL SHAWN TENENBLATT, AND DIGIVERSETECH LLC — JOINT AND SEVERAL LIABILITY)

1. Plaintiff incorporates by reference paragraphs 15–23, 44–158, and 173–174 as though fully set forth herein.
2. At all relevant times, Plaintiff maintained a valid and advantageous employment relationship in the Tampa Bay construction industry, with ongoing projects, client responsibilities, and wages/benefits dependent on uninterrupted performance.
3. Defendants intentionally targeted that employment relationship through publications identifying Plaintiff by full name and city and by tying those identifiers to Plaintiff's employer, its brand, values, and client-facing reputation.
4. Defendant Randall Michael McWhorter, operating as "TizzyEnt," created and disseminated a video naming Plaintiff and stating "*This indicates premeditation*" and "*Travess Matthew*

Wolford might be someone that you want to look at about that,” followed by “I’m going to make it real, real, real public for you.”

5. Defendant McWhorter’s audience functions as an incitement-and-doxing network that predictably crowdsources employer identity and contact channels and then acts upon them.

McWhorter’s scale (multi-platform, multi-million followers) and prior audience behavior made it substantially certain that publishing Plaintiff’s name and city would cause the public to locate and contact Plaintiff’s employer.

6. Defendant McWhorter republished the identical content to Instagram, X, and YouTube, compounding reach and foreseeably magnifying employer-directed harassment.

7. Defendant Michael Shawn Tenenblatt then adopted and expanded the same narrative, expressly tethering it to Plaintiff’s employment by importing screenshots from the employer’s website and stating that *“all the people of Tampa Bay ... should know the person that’s being hired to build their buildings would gleefully run them over with a car and then post about it online to brag about it.”*

8. Defendant Tenenblatt directly addressed Plaintiff and linked the campaign’s outcome to joint action with McWhorter, stating *“Between Tizzy’s post and my post, he’s gone,”* celebrating *“another mission accomplished,”* and repeatedly commenting on Plaintiff’s employment status and supposed separation.

9. Defendant Tenenblatt further portrayed Plaintiff as criminal (*“I wasn’t aware committing crimes was political”*) and unstable (*“low-budget Temu Adam Sandler meltdown,” “instead of seeking therapy”*), while overlaying employer imagery and commentary about whether Plaintiff

“aligns” with the employer’s stated values—thereby inviting employer scrutiny and third-party contact.

10. Defendant Digiversetech LLC, as the administrator of the “TizzyEnt” Facebook page, republished McWhorter’s June 14 video on June 16, carrying the same identifiers and accusations into another platform and predictably re-energizing the public’s employer-targeting conduct.

11. Defendants’ statements were delivered both verbally and simultaneously *displayed in animated, on-screen text overlays that typed the same language in written form*, creating parallel libel (written) and slander (spoken) injuries with each publication and each republication, and constituting independent republications across platforms.

12. In response to Defendants’ publications, Plaintiff’s employer experienced an overwhelming surge of hostile communications, including a flood of telephone calls to internal lines, emails to corporate addresses, and fraudulent online reviews that tracked the timing, wording, and themes of Defendants’ videos and audiences’ comment-thread coordination.

13. Within Defendants’ comment sections, multiple users coordinated to identify the employer, share contact avenues, and post fabricated or retaliatory reviews. These micro-conspiracies were foreseeable to Defendants given their audience history and the call-and-response structure of the posts.

14. The targeted harassment interfered with operations, client relations, and workplace peace, forcing managerial resources toward crisis handling, brand defense, and call triage rather than project execution.

15. Defendants' interference was intentional and unjustified. The pairing of Plaintiff's identity with employer branding and values, the celebratory acknowledgment of audience action, and the framing of Plaintiff as dangerous, criminal, and misaligned with employer culture demonstrate purpose or, at minimum, substantial certainty, to induce adverse employer action.

16. Defendants were not exercising any legitimate business right as to Plaintiff's employment relationship and acted without privilege; their conduct was not a protected internal report to the employer but a public, viralized incitement inviting mass reputational attack.

17. As a direct and proximate result of Defendants' conduct, Plaintiff's employment relationship was damaged and ultimately severed. Plaintiff suffered lost wages and benefits, loss of future earning capacity, reputational harm in his trade, and emotional distress.

18. The interference was aggravated by the repeated republications, cross-platform migrations, and playlisting (including "Temu Adam Sandler") that kept the attack discoverable, searchable, and active over time.

19. Defendants acted with actual malice or, at a minimum, with willful disregard of Plaintiff's rights, warranting punitive damages.

20. The injury is ongoing so long as the content remains available, is algorithmically resurfaced, or is further republished by Defendants or their agents.

WHEREFORE, Plaintiff respectfully asks that this Court enter judgment for Plaintiff and against Defendants **Randall Michael McWhorter, Michael Shawn Tenenblatt, and**

Digiversetech LLC, jointly and severally, for tortious interference with Plaintiff's employment relationship;

- a. Award compensatory damages for lost wages/benefits, loss of earning capacity, reputational injury, and emotional distress;
 - b. Award punitive damages based on Defendants' willful, malicious, and reckless conduct;
 - c. Grant equitable and injunctive relief restraining Defendants from further interference and prohibiting additional publications that target Plaintiff's employment relationship;
 - d. Order Defendants to permanently remove the identified videos, captions, playlists, and any substantially similar republications from all platforms under their control; and
 - e. Award costs, taxable fees, and such other and further relief as the Court deems just and proper.
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COUNT VI

CONSPIRACY BY COMMON DESIGN (AGAINST RANDALL MICHAEL McWHORTER, MICHAEL SHAWN TENENBLATT, AND DIGIVERSETECH LLC — JOINT LIABILITY)

- 1. Plaintiff incorporates by reference paragraphs 15–23, 44–158, and 173–174 as though fully set forth herein.
- 2. Defendants participated in a continuing and unified course of conduct to defame, harass, and economically harm Plaintiff through a coordinated online conspiracy driven by Defendant

Randall Michael McWhorter's extraordinary social-media reach and his non-ordinary, collectivized "public."

3. Defendant McWhorter operates a platform with millions of followers who, by his own admission, act as an extension of his will. He states *"I'm going to make it real, real, real public for you,"* but this "public" is not ordinary—it is a highly motivated, coordinated online mob that organizes within his comment threads to identify, contact, and destroy his chosen targets.

4. Plaintiff, a private individual and non-controversial citizen, merely followed Defendant McWhorter's TikTok account. McWhorter acknowledged this, stating *"I only saw your video, Travess, because your dumbass follows me."* Despite never meeting or communicating with Plaintiff, McWhorter declared *"I don't like him"* and proceeded to weaponize Plaintiff's lawful statements about roadway safety under Florida law into a false narrative of premeditated violence.

5. McWhorter's professional background in film editing and post-production evidences calculated design—he stitched Plaintiff's entire video into his own, inserted multiple green-screen overlays, imported off-platform images, and synchronized animated text reading *"This indicates premeditation"* and *"Travess Matthew Wolford might be someone you want to look at about that."*

6. These statements, spoken and simultaneously displayed in animated text, created dual publication—slander and libel—each capable of independent injury and republication.

7. McWhorter's followers responded as expected and as intended. Within his comment sections, numerous "anchored conspiracies" developed beneath primary replies. Each anchor represents a

user replying directly to McWhorter's post; beneath that reply, other users coordinate specific harassment acts, including contacting Plaintiff's employer, posting fraudulent reviews, and surveilling Plaintiff's online presence.

8. Distinct conspiracy clusters formed around repeating defamatory themes:

- Accusations of "premeditation" and criminality;
- Claims Plaintiff was "fired" or "unemployed";
- Fabrications of incest or mental instability;
- Discussions fixating on Plaintiff's dog and personal imagery inserted by Defendants.

9. These conspiracies represent decentralized but interconnected "nodes" within the larger incitement network fostered by McWhorter's audience architecture.

10. Defendant Michael Shawn Tenenblatt joined the same circuit immediately thereafter, consuming McWhorter's defamatory narrative and republishing its themes. His June 15 video stated "*Ladies and gentlemen, meet who the internet has dubbed Temu Adam Sandler... Travess Matthew Welford,*" and explicitly tied Plaintiff's identity to his employer, stating "*None of these seem to align with your company's culture.*"

11. Defendant Tenenblatt repeatedly referenced McWhorter by name and celebrated joint results: "*Between Tizzy's post and my post, he's gone.*" He described the outcome as "*another mission*

accomplished” and self-identified as “*the platform to amplify voices,*” confirming his role as connective tissue between McWhorter’s upstream defamation and downstream harassment.

12. The “premeditation” falsehood acted as a recurring watermark linking both Defendants’ audiences. It reappeared in Tenenblatt’s comment threads verbatim, showing that McWhorter’s lie had migrated through audience overlap and algorithmic reinforcement, stamping the same defamatory theme across multiple platforms.

13. Defendant Digiversetech LLC joined the conspiracy by republishing McWhorter’s June 14 video on the “TizzyEnt” Facebook page on June 16 with identical narration and captions. This republication extended the lifespan and scope of the defamatory campaign and constitutes concerted action under *Restatement (Second) of Torts* § 876(b) and (c)—participation in a common design and substantial assistance to the tortious conduct of another.

14. Each Defendant benefited from and depended upon the same incitement network. The foreseeable pattern—public identification, employer targeting, comment-thread conspiracies, and harassment—was not spontaneous but structural, engineered by McWhorter’s content model and replicated by Tenenblatt and Digiversetech.

15. The conspiracy’s objective was to damage Plaintiff’s reputation, sever his employment, and subject him to ongoing humiliation and fear. Each Defendant’s participation furthered that unlawful end.

16. Plaintiff’s resulting damages—including job loss, reputational destruction, and severe emotional distress—were the natural and foreseeable consequence of the Defendants’ coordinated conduct.

17. Defendants' actions were malicious, willful, and taken with reckless disregard for Plaintiff's rights. Under Florida law and *Restatement (Second) of Torts* § 876(b) and (c), each Defendant is jointly and severally liable for the tortious acts committed by any other participant in the common design.

WHEREFORE, Plaintiff respectfully demands this honorable Court enter judgment jointly against **Defendants Randall Michael McWhorter, Michael Shawn Tenenblatt, and Digiversetech LLC** for civil conspiracy by common design;

- a. Award compensatory damages for reputational, economic, and emotional injury;
- b. Award punitive damages to punish and deter this organized, foreseeable misuse of online audience power;
- c. Grant injunctive relief prohibiting Defendants and their agents from further publishing or coordinating harassment of Plaintiff;
- d. Order permanent removal of all related publications, videos, captions, and reposts; and
- e. Award taxable costs, attorney's fees, and such further relief as the Court deems just and proper.

COUNT VII

INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS (AGAINST RANDALL MICHAEL McWHORTER, MICHAEL SHAWN TENENBLATT, AND DIGIVERSETECH LLC — JOINT AND SEVERAL LIABILITY)

1. Plaintiff incorporates by reference paragraphs 15–23 and 159–171 as though fully set forth herein.
2. At all times material, Defendants engaged in a coordinated online campaign that publicly misrepresented Plaintiff’s words, conduct, and intent, falsely attributing to him violent and criminal motives that did not exist.
3. Defendants’ actions included the repeated publication and republication of statements asserting or implying that Plaintiff intended to commit vehicular violence, that he was “premeditating” harm, or that he posed a physical danger to others.
4. Each Defendant participated in the creation, amplification, and circulation of this false narrative across multiple social media platforms, ensuring its viral spread and persistence over time.
5. The conduct was extreme, outrageous, and well beyond the bounds of decency tolerated in a civilized society. It invited the public to perceive Plaintiff as a violent criminal, subjected him to community scorn, and exposed him to imminent danger.
6. Defendants’ conduct was intentional or, at a minimum, undertaken with reckless disregard for the predictable emotional harm it would cause Plaintiff.

7. Plaintiff's statements, as reflected in paragraphs 159–171, contained no language that could reasonably be construed as threatening, violent, or criminal in nature. Despite this, Defendants publicly framed those statements as “premeditation” and “intent to run over protesters,” knowingly fabricating an image of Plaintiff as dangerous and unstable.
8. Defendants' conduct foreseeably resulted in severe emotional distress. Plaintiff suffered anxiety, loss of sleep, ongoing fear, and repeated intrusions into his personal life, including direct death threats, anonymous late-night calls, and mailed harassment mirroring Defendants' own mocking tone and language.
9. Plaintiff's distress was further aggravated by the economic and reputational fallout from the same defamatory campaign, which undermined his employment, client relationships, and community standing.
10. Defendants' acts were malicious, deliberate, and without privilege or justification. Their purpose was to humiliate, intimidate, and destroy Plaintiff's peace of mind through continuous online ridicule and public hostility.
11. As a direct and proximate result of Defendants' conduct, Plaintiff has suffered severe emotional distress, mental anguish, anxiety, and loss of security, all of which continue to this day.

12. The injury is ongoing as the content remains publicly viewable, algorithmically recycled, and periodically resurfaced to new audiences, perpetuating emotional harm and fear.

WHEREFORE, Plaintiff respectfully demands that this honorable Court: Enter judgment for Plaintiff and against **Defendants Randall Michael McWhorter, Michael Shawn Tenenblatt, and Digiversetech LLC**, jointly and severally, for intentional infliction of emotional distress;

- a. Award compensatory damages for emotional pain, mental anguish, loss of security, reputational injury, and associated economic losses;
- b. Award punitive damages based on Defendants' willful, malicious, and reckless disregard of Plaintiff's rights and wellbeing;
- c. Grant injunctive relief ordering the removal of the videos, posts, and republications that continue to cause emotional harm;
- d. Enjoin Defendants from any further harassment, ridicule, or online contact involving Plaintiff's name, likeness, or persona; and
- e. Award costs, taxable fees, and such other and further relief as the Court deems just and proper.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Amended Complaint was furnished to Defendant Michael Shawn Tenenblatt, by and through his counsel of record Alison M. Steele, ALISON M. STEELE, P.A., 146 Second Street North, Suite 310, St. Petersburg, FL 33701, Email: alison@asteelalaw.com, on this 30th day of October, 2025, by electronic mail and through the Florida Courts E-Filing Portal.

Defendants Randall Michael McWhorter and Digiversetech LLC will each be served individually and respectively by a licensed process server. Summons for these Defendants will be submitted to this Honorable Court for approval and issuance, and an Affidavit of Return of Service will be filed with the Court upon completion of service.

Respectfully submitted,

A stylized, handwritten signature in black ink, appearing to read 'TW' or 'Travess'.

/s/ Travess Wolford

Travess Matthew Wolford

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Plaintiff, Pro Se

