

**IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT  
IN AND FOR PINELLAS COUNTY, FLORIDA  
CIVIL DIVISION**

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**TRAVESS WOLFORD,**

Plaintiff,

v.

**MICHAEL TENENBLATT**

a/k/a “**Floridian Druid**”,

TikTok handle: **@druid\_of\_justice**,

Defendant.

CASE NO: \_\_\_\_\_

DIVISION: \_\_\_\_\_

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**COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF**

Plaintiff Travess Wolford, by and through undersigned filing, hereby sues Defendant Michael Tenenblatt, also known as “Floridian Druid” (TikTok handle: **@druid\_of\_justice**), and alleges as follows:

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## I. INTRODUCTION

1. This is a civil action asserting claims of **defamation per se, civil conspiracy, tortious interference** with economic expectancy, and **intentional infliction of emotional distress**, arising from an orchestrated, ongoing, and malicious digital barrage executed by the Defendant. The campaign is characterized by knowingly false, injurious, and strategically disseminated accusations designed to irreparably mutilate the Plaintiff's reputation, destabilize his professional standing, and inflict sustained psychological trauma through coordinated public humiliation across multiple social media ecosystems
2. Defendant, Michael Tenenblatt, operating in a public capacity under the alias "Floridian Druid" via the TikTok account @druid\_of\_justice, has deliberately disseminated and algorithmically amplified demonstrably false statements attributing criminal intent, ideological extremism, and violent proclivities to Plaintiff. These statements were not only knowingly fabricated but strategically engineered to incite coordinated digital mobbing, catalyze reputational annihilation, and extract financial gain through the monetization of defamatory narratives—specifically via merchandise sales facilitated by commercial platforms including TeePublic, thereby converting reputational harm into direct economic enrichment.
3. These actions were undertaken with calculated intent to inflict maximum harm and have precipitated substantial and continuing damage to Plaintiff's personal dignity, professional trajectory, and physical security. Consequences include involuntary

termination of employment, credible threats to personal safety, systemic reputational degradation, and sustained psychological trauma. Each of these injuries is traceable to materially false assertions so egregious in nature—imputing criminality, moral depravity, and social ostracism—that they satisfy, without ambiguity, the legal standard for defamation *per se*.

4. Venue is proper in **Pinellas County**, Florida, because Plaintiff resides in this county and the primary effects of the Defendant's unlawful conduct — reputational harm, job loss, targeted harassment — were experienced here

## **II. PARTIES, JURISDICTION, AND VENUE**

5. Plaintiff Travess Wolford is a natural person, over the age of 18, and at all times material hereto was a resident of Pinellas County, Florida.
6. Defendant, Michael Tenenblatt, publicly known as “Floridian Druid” and operating under the TikTok handle [@druid\\_of\\_justice](#), is an individual domiciled in Ruskin, Florida. Tenenblatt maintains a highly visible online presence across multiple social media platforms and commercial storefronts, including but not limited to TeePublic, through which he has publicly disseminated, monetized, and rebroadcast defamatory content giving rise to the claims herein.
7. Upon information and belief, Defendant resides in Ruskin, Florida, located in Hillsborough County, and has intentionally directed tortious conduct into Pinellas County, Florida. Said conduct includes the dissemination of defamatory content and

targeted harassment, the primary effects of which were experienced by Plaintiff within this jurisdiction—thereby satisfying the requirements for personal jurisdiction and venue.

8. This Court has **subject matter jurisdiction** pursuant to Article V, § 20(c)(3) of the Florida Constitution and applicable Florida statutes, as the amount in controversy exceeds \$30,000 exclusive of fees and costs, and the claims arise under Florida tort law.
9. This Court has personal jurisdiction over Defendant pursuant to § 48.193(1)(a)(2), Florida Statutes, as Defendant intentionally directed tortious conduct—including defamation, reputational sabotage, and targeted harassment—into the State of Florida, causing direct and foreseeable injury to a Florida resident. These actions satisfy the statutory requirements for specific jurisdiction.
10. Venue is proper in **Pinellas County, Florida** under § 47.011, Florida Statutes, because the causes of action accrued in this county, and Plaintiff resides here.

### **III. STATEMENT OF FACTS**

21. On or about June 15, 2025, Defendant, using the social media handle @druid\_of\_justice and the display name “Floridian Druid,” published a TikTok video located at the following URL:

[https://www.tiktok.com/@druid\\_of\\_justice/video/7516150662623710494](https://www.tiktok.com/@druid_of_justice/video/7516150662623710494)

22. The video includes the following verbatim statement, directly identifying and targeting

Plaintiff:

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**Defendant's Full Statement (verbatim):**

*"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 that the person who is being hired to build their buildings, would gleefully run over them 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 the communities in which we live. Travess, you messed up."*

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**Targeted Legal Breakdown**

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- ◆ **False Imputation of Criminal Conduct (Defamation Per Se)**

*“Would gleefully run over them with a car and then post about it online to brag about it.”*

- Defendant falsely and publicly asserted that Plaintiff endorses or engages in vehicular assault against peaceful civilians. In context, these statements deliberately imply that Plaintiff would weaponize a motor vehicle to harm individuals—including clients of his employer—and then gloat about the act online.
- This is a factual accusation of a felony, not opinion, and qualifies as defamation per se under Florida law.

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- ◆ **False Accusation of Spreading Dangerous Misinformation**

*“Thinks it’s funny to get on the internet and spread misinformation that you can just run over peaceful protesters...”*

- Defendant deliberately ascribes incendiary and ideologically volatile content to Plaintiff—material which Plaintiff has neither authored, disseminated, nor endorsed in any capacity.
- This fabricates a provably false narrative designed to destroy reputation and credibility.

- Constitutes defamation per se by imputing criminal incitement and reckless endangerment.

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- ◆ **False Political Framing (Ideological Defamation)**

*“Like other MAGA creators...”*

- Defendant deliberately labels Plaintiff as a “maga creator” to frame him within a stigmatized political identity.
- This type of ideological branding is intended to incite political hostility, increase targeting, and trigger cancellation campaigns.
- While political affiliation alone may not be defamatory, using it in conjunction with false criminal accusations creates a defamatory composite image.

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- ◆ **Explicit Naming of Plaintiff (Identity Anchor)**

*“Travess Matthew Wolford”*

- Full legal name is used to anchor the defamatory statement to a real-world identity, escalating the likelihood of reputational harm, targeting, and employment fallout.

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♦ ***Mockery-Based Identity Anchor (Harassment Amplifier)***

*“Temu Adam Sandler”*

- “Temu Adam Sandler” is used to publicly mock Plaintiff’s appearance and make him instantly recognizable across platforms.
- This mocking moniker appears repeatedly in harassment campaigns, serving as a shorthand tag for coordinated abuse.

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♦ ***Tortious Interference with Employment***

*“I wonder if that mentality matches with your employer; Bay Area Building Solutions”*

*“All the people of Tampa Bay... should know...”*

- Defendant incites others to retaliate against Plaintiff by damaging his relationship with Bay Area Building Solutions.

- This satisfies the elements of tortious interference: awareness of the employment relationship, intentional disruption, and resultant harm.

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- ◆ **False Representation of Misalignment with Employer Values**

*“None of these seem to align with your company’s culture...”*

- Falsely implies that Plaintiff violated his company’s professional standards, further weaponizing employment risks.

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- ◆ **Incitement to Harassment and Cyberstalking**

*“Travess, you messed up.”*

- Statement closes with a clear callout, meant to signal retaliation and online pile-on.
- This reinforces cyberstalking behavior under Florida law (§ 784.048).

## **Coordinated Fallout and Digital Amplification**

Immediately upon the publication of Defendant’s defamatory TikTok video on June 15, 2025, a quantifiable cascade of retaliatory conduct was unleashed within the comment threads and adjacent digital spaces. This backlash encompassed targeted efforts to interfere with Plaintiff’s

employment, public allegations of criminality, deliberate reputational degradation, and orchestrated attempts to induce Plaintiff's termination and disrupt affiliated business interests. Defendant, operating under the alias "Floridian Druid," did not remain a passive observer of the fallout—he actively participated in and publicly celebrated the Plaintiff's resulting termination.

Critically, Plaintiff's separation from employment did not arise from any actionable misconduct or expressive conduct attributable to him. In fact, the employer affirmatively acknowledged that Plaintiff's political commentary on valid Florida anti riot measures are constitutionally protected under the First Amendment and could not lawfully support termination. The termination was instead precipitated by the cumulative impact of the coordinated harassment campaign incited by Defendant's video—specifically, the influx of digital threats, defamatory calls to the employer, pressure exerted on vendors, brand attacks against plaintiffs employer, coordinated manipulation of online reviews (review bombing), and reputational sabotage by platform users acting upon Defendant's provably false narrative.

This sequence of events establishes a direct and foreseeable causal chain between Defendant's knowingly false and inflammatory public statement—algorithmically magnified—and the resulting economic loss, reputational decimation, and ongoing digital surveillance and harassment experienced by Plaintiff. Each of the following exhibits (A-1 through A-21) contains primary source evidence of user-generated comments and public statements that reflect:

- **Tortious interference with business relationships**
- **Defamation per se**

- Cyberstalking under Florida Statute § 784.048

- Civil conspiracy via coordinated digital action

The following is a series of comments grabbed from the attached screen shots (Exhibits A-1 through A-21) and categorized into the various offenses which they contain.

**Comment activity pulled from Exhibit A-1 listed and categorized below**

*Identity Anchor Displayed: "temu Adam Sandler"*

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**Tortious Interference with Business Relationships**

@Ferr — “Boycott Bay Area building solutions”

*Explicit call for public retaliation against the Plaintiff's employer.*

@AntonioMontana — “Boycotting Bay Area building solutions”

*Echo amplification of employer boycott, increasing reputational and economic pressure.*

@mysticct — “A few reviews might get the bosses attention”

*Encouragement of coordinated review bombing to provoke employer action.*

@Steph — “just left a great review if Travis, as did others. more reviews needed”

*Open admission of coordinated employer review activity tied to false narrative.*

@Floridian Druid (creator) — “He has been let go and they have been removing reviews about it”

*Public confirmation and celebration of employment outcome, reinforcing mob coordination.*

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### **Defamation Per Se**

@Kyle O'Donnell — “they fired him”

*False factual claim implying guilt and termination for misconduct.*

@ChiefScisniper1989 — “umm why? he was fired,”

*Furthering public belief in false cause of termination, damaging reputation.*

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### **Civil Conspiracy via Coordinated Digital Action**

@rylic2R — “7/5 and no reviews”

*Signal boosting review attack effort.*

@sea cow — “you know I will support him”

*Acknowledgment of alignment with retaliation narrative, contributing to mob effort.*

### **Comment activity pulled from Exhibit A-2 listed and categorized below**

*Identity Anchor Displayed: "temu Adam Sandler"*

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### **Tortious Interference with Business Relationships**

@CDog999 — “If he’s still working there I’ll take my business elsewhere.”

*Explicit economic threat aimed at coercing employer action.*

@Shandi5504 — “I sent an email to the one in Florida”

*Confirms direct interference with business relationships through external communication.*

@Carly Baker — “This man needs to be fired immediately!”

*Direct demand for Plaintiff’s termination, framed as a moral imperative.*

@Survive2025 — “YES!!!”

*Celebratory response reinforcing retaliatory employment pressure campaign.*

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## **Defamation Per Se**

@Marc Gooloom Ownership — “Bay Area Building Solutions - sad sad sad”

*Negative smear linked to Plaintiff’s identity and employment based on false premise.*

@Floridian Druid (creator) — “He’s already been fired”

*Public dissemination of an unverified employment claim implying wrongdoing.*

@tagger95 — “Not a good look”

*Suggests moral or reputational failing based on false framing of content.*

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## **Civil Conspiracy via Coordinated Digital Action**

@Me — “...we’ll look up the one in California”

*Coordination of effort to misidentify and target sister businesses.*

@Kat uwu — “This co is in CA, not FL. Gotta find the right one”

*Promotes cross-entity targeting despite unclear facts.*

@Survive2025 — “Sound one in Tampa, left review”

*Evidence of coordinated campaign to harm business via negative reviews.*

### **Comment activity pulled from Exhibit A-3 listed and categorized below**

*Identity Anchor Displayed: "temu Adam Sandler"*

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### **Tortious Interference with Business Relationships**

@CDog999 — “If he’s still working there I’ll take my business elsewhere.”

*Stated intention to withdraw business unless Plaintiff is fired.*

@leekleard135 — “Wow. Not using this if he is still employed”

*Reinforces financial coercion by threatening to boycott business.*

@Ashley — “BAY AREA BUILDING SERVICES IN TOWN N COUNTRY”

*Attempts to identify and publicly expose specific location of Plaintiff’s employer.*

@Sassysherry — “Is this the type of employee you employ?”

*Framed to elicit public employer action under pressure.*

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## **Defamation Per Se**

@Louis — “What human being would say he’s ok with running someone over?”

*Falsey attributes criminal intent to Plaintiff, meets defamation per se standard.*

@Carly Baker — “This man needs to be fired immediately!...everything that you post on the internet stays on the internet.”

*Condemns protected expression, asserts moral unfitness based on false claims.*

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## **Civil Conspiracy via Coordinated Digital Action**

@justluann — “leave a review!!!”

*Call to action encouraging mass retaliation through negative employer reviews.*

@elcid — “Wow. The bosses probably have the same mentality.”

*Expands defamation to employer by association, fueling coordinated backlash.*

## **Comment activity pulled from Exhibit A-4 listed and categorized below**

*Identity Anchor Displayed: "temu Adam Sandler"*

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## **Defamation Per Se**

@Nickie — “Threat of vehicular homicide? Hope he is not driving a company car. Keep your eyes out”

*Falsey asserts Plaintiff made a threat to commit homicide with a vehicle, constituting direct criminal imputation.*

@user21523882622 — “Terrible behavior should be punished”

*Vague condemnation reinforcing defamatory framing of Plaintiff as deserving of retribution.*

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### **Tortious Interference with Business Relationships**

@E-Beek — “If they respond with... ‘we support it’... they will be out of business”

*Economic intimidation of employer in response to perceived failure to terminate Plaintiff.*

@nonplayercharacter16 — “Cancel all their contracts”

*Encourages mass cancellation of business relationships with Plaintiff’s employer.*

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### **Civil Conspiracy via Coordinated Digital Action**

@user896080791674 — “Going there now hope everybody leaves a review and it’s not gonna be good for Travis. Sometimes karma is the best way to learn lesson.”

*Explicit call for negative review bombing as a method of punishment.*

@Me — “Me too”

*Affirms participation in coordinated retaliation effort.*

### **Comment activity pulled from Exhibit A-5 listed and categorized below**

*Identity Anchor Displayed: "temu Adam Sandler"*

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## Defamation Per Se

@James Pierce — “Here is the funny thing about his post, if he actually did that, now it’s premeditated.”

*Falsely asserts criminal act of vehicular violence with added implication of premeditation—textbook defamation per se.*

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## Tortious Interference with Business Relationships

@Jennifer Davis — “We see what kind of people work at BABS...I’ll spread the news in my community. Travis needs to find a new job or this company is going under.”

*Explicit threat to destroy employer reputation and push for Plaintiff’s termination through social defamation.*

@the\_real\_spicy\_cajun — “Horrible hiring practices!!”

*Denigrates employer’s judgment for hiring Plaintiff, contributing to reputational harm.*

@Sherni Lundberg-Bake — “Wow agree. I would not want to be anywhere near this man.”

*Implies Plaintiff is dangerous and unfit for workplace environments, contributing to termination pressure.*

@karlarox420 — “BABS cutting corners?”

*Accuses employer of negligence for hiring Plaintiff, a form of economic coercion by way of implied liability.*

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## Civil Conspiracy via Coordinated Digital Action

@❤️Før ✨ — “Boycott Bay Area building solutions”

*Calls for collective boycott against Plaintiff's employer, clear act of targeted retaliation.*

@AntonioMantana — “Boycotting Bay Area building solutions”

*Affirms active participation in employer boycott effort.*

@mystict — “A few reviews might get the bosses attention”

*Encourages mass review manipulation to provoke employer discipline or termination.*

## Comment activity pulled from Exhibit A-6 listed and categorized below

*Identity Anchor Displayed: "temu Adam Sandler"*

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### Defamation Per Se

@brujaunited — “Yup and he told us all. We are all witnesses now.”

*Falsely asserts Plaintiff confessed to criminal conduct.*

@Cavalierious — “And proof is on file 📁”

*Falsely implies existence of official criminal documentation or charges.*

@Deb Nelson — “And all posted here for evidence. some people are just too easy.”

*Presents video and comment thread as definitive proof of guilt, reinforcing the defamatory narrative.*

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## **Political Targeting / Civil Conspiracy**

@debra4001 — “They are uneducated. Trump likes them that way”

*Injects political insult to associate Plaintiff with ignorance and far-right extremism.*

@nomorebans — “Which will void out their right to impose stand your ground under the law that was created in 2021 lol”

*Erroneously asserts Plaintiff forfeited legal rights under Florida law, distorting facts to imply illegality.*

@sevenpringss5301 — “Well, Florida is becoming the next slab city with all the lawlessness.”

*Broad regional attack used to insinuate that Plaintiff is representative of chaotic or criminal behavior.*

## **Comment activity pulled from Exhibit A-7 listed and categorized below**

*Identity Anchor Displayed: "temu Adam Sandler"*

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### **Defamation Per Se**

@Brenchb — “Stop no way?!?! He might get away with it in FL court system but the personal injury lawyers are going to make some money off his stoopid ass!!”

*Asserts Plaintiff committed an injurious, litigable offense likely to result in successful civil claims.*

@Brencb — “They believe that Daddy Sumpty will get them off... and sadly he probably will!!

100”

*Further assertion that Plaintiff is guilty but might evade accountability through influence.*

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### **Political Targeting / Civil Conspiracy**

Mo — “A true MAGA”

*Injects political branding to polarize perception of Plaintiff, implying extremism.*

@insubcaudude — “Exactly!!! Because it is... and I truly believe that would be the case for 98% of any who actually encounter this issue. MAGA intentionally putting themselves in position to use this as a defense”

*Alleges intentional exploitation of legal self-defense statutes by political affiliation group; insinuates fraudulence or calculated abuse of law.*

@justcameforthecomments — “They don’t know and let’s not educate them. What’s their favorite saying, FAFO?”

*Implies Plaintiff is ignorant, violent, and deserving of harm.*

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### **Mocking / Reputational Harm**

@Sonia — “He seems bright 😊”

*Sarcastic insult intended to discredit intellect or rationale.*

@The\_real\_spicy\_cajun — 

*Applauds surrounding defamatory commentary, serving as endorsement and amplification.*

### **Comment activity pulled from Exhibit A-8 listed and categorized below**

*Identity Anchor Displayed: "temu Adam Sandler"*

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#### **Tortious Interference with Business Relationships**

@JizzleJ — “I really want to see what his employer said, if anything to him. 

*Intent to pressure employer action through social intimidation.*

@Tuxxymom — “Yeah I just left a review for Bay Area Building Solutions... And it looked as though there were quite a few other reviews... Bro probably going to go to work this morning, And they've called into the office for "a conversation”

*Admits participation in negative review campaign intended to provoke employer discipline.*

@Mo Garner — “I just found them on google and I think they're deleting reviews...”

*Participation in collective review bombing with an assumption of corporate damage control.*

@Prof Yapper — “They're deleting the reviews I think”

*Confirms group targeting and flags employer's reactive measures.*

@xxj0nt\_mommy9x — “They are, they have a 4.1 on Google rn and only one review that's recent. I went to go review them tho let's see if it stay up 

*Explicit effort to post defamatory reviews, with anticipation of being censored for falsity.*

@ashleykinler — “This poor company only has a few poor Google reviews in the last 24 hours.

We can do better”

*Coordinated call to arms for false, harmful reviews.*

@Step — “Review done. we need more”

*Confirms completion of sabotage and encourages expansion.*

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## **Civil Conspiracy**

@mshD0gil — “You understood the assignment!! Well done!!”

*Cheerleading and confirming deliberate attack as part of a group initiative.*

@shelster — 🔥🔥🔥🔥🔥

*Applauding sabotage in group context; amplifies harassment effort.*

## **Comment activity pulled from Exhibit A-9 listed and categorized below**

*Identity Anchor Displayed: "temu Adam Sandler"*

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## **Tortious Interference with Business Relationships**

@Johnny Franco — “Just left mine!”

@ user25966916297346 — “done”

@the\_plant\_mage — “Done!”

@ObsessedwithOrdinary — “Done!”

@danielle p — “someone posted the video on their review. amazing.”

@BarkingRabbit — “Remember to change or delete them if the company does the right thing”

@Jan — *Just left one*

*All of the above confirm direct participation in false review bombing or call for continued interference with employer reputation based on subjective and defamatory social media context.*

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### **Civil Conspiracy**

@shelster — “Same ”

@itsmadickies — “Mission complete!”

@ E — “done”

@J77pink — “Let’s do it!!”

@Club A+1 — “Update??”

*Reinforces group coordination, collective execution, and intention to manipulate reputation metrics at scale.*

### **Comment activity pulled from Exhibit A-10 listed and categorized below**

*Identity Anchor Displayed: "temu Adam Sandler"*

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### **Tortious Interference with Employment**

@MizRizzle — “I live in Florida about an hour away I emailed the company about him. Maybe they’re into their employees premeditatively threatening murder on other Americans. We’ll see.”

@BishyWahWah — “Email sent to HR.”

@fly for food — “I emailed as well”

*Direct evidence of attempts to initiate employment retaliation via false and defamatory claims of premeditated murder. This comment specifically seeks to harm the subject’s livelihood by injecting criminal accusations into a workplace environment.*

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### **Conspiracy to Interfere with Employment**

@rebbie5 — “Let us know the outcome!!”

@MizRizzle — “Just doin my part”

@brian — “Thank you for your public service”

@curtis80.exe — “Any response?”

@MizRizzle — “Nothing yet!”

@slimyslobo60 — “it’s been two days. anything?”

@gregross700 — “Thank you”

@yourcuteboutique — “Great, thank you ✨”

JillyBenz — “thank you ❤”

*Encourages and affirms the effort to sabotage employment. The thread reflects a coordinated effort, underscored by public praise and ongoing inquiry into the status of the disruption campaign.*

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## **Amplification Toward Public and Law Enforcement**

@pMAULICIOUSpr — “but also need to sent this to the news this is what they got after the sheriff gave the briefing saying that’s this could be one of the outcome ...”

*This individual seeks to escalate defamatory claims to media and law enforcement under the guise of public safety, furthering reputational harm without evidence.*

## **Comment activity pulled from Exhibit A-11 listed and categorized below**

*Identity Anchor Displayed: "temu Adam Sandler"*

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### **Tortious Interference with Employment**

@MizRizzle — “Nothing yet, hoping to hear he’s been fired.”

@MizRizzle — “Nothing, I even checked my junk mail. And I do know he either made private or quit his TikTok account. But I haven’t heard anything about the job.”

@kayyy — “As a Floridian they hire anyone like Travess”

*This thread shows a sustained attempt to influence employment status through speculative and malicious commentary. MizRizzle continues probing for fallout while kayyy further defames the individual by name.*

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### **Civil Conspiracy / Coordinated Targeting**

@Art Quintana — “Thank you.”

@MizRizzle — “I know too well that’s the truth unfortunately. I did what I could, I tried.”

@leleReinhart1975 — “They not gonna reply because they probably embarrassed 🤪🤪”

@ hatetheplayernothegame —” Same thing I was thinking. They may not care.”

@katymom01 — 🙌🙌🙌🙌🙌

*These comments indicate mutual affirmation and encouragement of efforts to interfere with employment. Several commenters confirm participation and express shared satisfaction in the coordinated campaign.*

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### **Persistent Harassment / Employment Surveillance**

@Hi — “Hi, it’s been a few days. Did they ever respond?”

@aw —” Aww sighhhh. Maybe resend it if you can? Like until they respond? Idk. I’m gonna email too”

*These entries document obsessive tracking of consequences and a willingness to continue interference efforts until termination is confirmed.*

### **Comment activity pulled from Exhibit A-12 listed and categorized below**

*Identity Anchor Displayed: "temu Adam Sandler"*

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### **Tortious Interference with Employment**

@emc —” Send his company an email. I just emailed this company. Rise up!”

@luvlinfert1234 — “I sent them an email as well!”

@Angelus — “I emailed called and went to their Twitter”

@jennbunnyak3 — “Email please!”

@jmaecakes84 —” I emailed them!”

@annlechuck — “Great idea!!”

@intention\_tarot — “Done!”

*Multiple users confirm direct action taken to sabotage employment relationships by contacting the employer and social platforms. This satisfies the basic elements of tortious interference: intentional disruption of a known economic relationship.*

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### **Defamation Per Se / Political Discrimination**

@user202433069603 — “If he found out you have opposing political views, he could maliciously pay you back by sabotaging the service you paid him to do.”

*This unqualified statement imputes malicious and unethical behavior in a professional capacity. It is defamatory on its face and, depending on jurisdiction, may meet the standard for defamation per se as it implies professional misconduct.*

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### **Group Conspiracy / Encouraged Participation**

@beautosbtcflc — “You are my hero 🎉”

@thatguyinyourclass —” I’ve worked for a number of construction companies across the bay... 99% of them are all owned by super conservative people just like the guy in the...”

*These posts affirm and encourage others to act or further the harassment narrative. This demonstrates awareness of a coordinated objective and shared ideological justification.*

### **Comment activity pulled from Exhibit A-13 listed and categorized below**

*Identity Anchor Displayed: "temu Adam Sandler"*

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#### **Tortious Interference with Employment**

@Chuckie Brown — “You're correct but if we all put him on blast along with the company they will react. It all about the money.”

@Dona.Telo68 — “Well we can contact the business administration and the BBB.”

@Sylviadad — “I called, everybody please call!”

@CandyCane812 — “Aww man. I'd love to see his termination video.”

@emc — “Me too!”

*Coordinated effort to pressure employer through financial risk and regulatory complaint. Use of “blast” and “termination video” shows intent to force punitive employment action.*

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#### **Civil Conspiracy / Coordinated Targeting**

@thatguyinyourclass — “I'd love to see it. While we're at it throw Super Structures in Campbell CA on our list too. Two trash twin brothers own it.”

@Richard Fidcilano — “You're right about that. I work for many contracting companies myself over the years. But!! what I do know is. If you cost them money, they will turn that back to you.”

@user2024135069603 — “EXACTLY, BRO!!”

@user2024135069603 — “Your point is well taken...”

*These comments show ideological alignment, intent to financially harm, and group coordination tactics aimed at manipulating outcomes beyond this case (e.g. targeting unrelated companies). This supports civil conspiracy claims.*

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#### **Comment activity pulled from Exhibit A-14 listed and categorized below**

*Identity Anchor Displayed: "temu Adam Sandler"*

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#### **Defamation Per Se – False Imputation of Criminal Acts (Premeditated Felony)**

@MysteryUnknownLight — “That’s not legal Travis, that’s called vehicular manslaughter.”

@susyzamora861 — “don’t forget “premeditated””

@JayCee — “And “intent””

@byron — “I’d say premeditation rules out manslaughter and bumps it up to murder”

@bititacar — “Vehicular homicide, actually. Manslaughter implies it was accidental.”

@emmykat90 — “ homicide. If it’s premeditated it’s homicide”

*These comments falsely declare a legal finding of premeditated homicide or murder, which constitutes defamation per se. Statements impute a serious crime that would damage personal and professional reputation instantly and irreparably.*

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## **Digital Legal Analysis Used to Reinforce False Criminality (Amplified Defamation)**

@Screechawk — “no, it would only be “legal” if the person in the car feels they’re in danger, so unless they literally surround his car, this video would be a damning piece of evidence of premeditation”

@CoosmOm2020 —” In Florida it’s legal if the protester is in the road.”

*These replies attempt to argue criminal liability in a public thread, giving a veneer of legal legitimacy to the premeditated homicide accusation, escalating exposure.*

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## **Political Targeting / Viewpoint Discrimination**

@MadMajor23 — “why does MAGA seem so gleeful about hurting other people/entertaining the idea of Civil War (which the South already lost once btw??)”

@MuffinDon'tBeefy —” I just don’t get it. Republicans won every branch of government and are getting everything they voted for. Why are they STILL so angry and unhappy????”

*Statements imply that because of political beliefs, the subject is violent, irrational, and unfit for society—piling on as part of viewpoint-based mob condemnation.*

## **Comment activity pulled from Exhibit A-15 listed and categorized below**

*Identity Anchor Displayed: "Travess Wolford Email – Project Superintendent @ Bay Area Building Solutions"*

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### **Tortious Interference – Calls for Employer Action / Employment Targeting**

@alecc — “BAY AREA building solutions take action”

@Floridian Druid — “They did”

@mass\_plumber — “imagine emailing the company about this..... 🤣🤣”

@Kathy Holt — “Bay Area Building Solutions, this is sick”

@Michelle Gonzalez — “Oh he just posted 10 hrs ago basically begging for help that an influencer sent a mob after him to cancel him 🤣🤣🤣”

*These comments display active encouragement and endorsement of employer-directed pressure based on false criminal allegations, resulting in economic harm. Creator involvement confirms coordination.*

---

### **Amplifier Node Confirmation – Creator Admission of Impact**

@Floridian Druid — “They did”

@Floridian Druid — “Click on the playlist below, all updates I have are there!”

*The defendant responds to pressure from followers and confirms real-world employment fallout. This strengthens the link between content creation and tortious interference.*

---

### **Civil Conspiracy – Coordinated Group Pressure to Harm Employment**

@jensie4 — “What did they do as a response to Temu Adam Sandler?”

@Götterdammerung — “Update please”

@Götterdammerung — “Right on!”

@William Brust — “Just playing devils advocate... Desantis DID say this first. He should be held accountable too if we’re trying to get his parrots fired.”

*These comments reveal organized intent to pressure employment action through shared outrage narratives, aligning with civil conspiracy when conducted knowingly over false statements.*

---

### **Federal Exposure Commentary – Criminal Statute Reference**

@Pejorative — “Fun fact: 18 U.S. Code § 875(c) – Threatening communications across state lines (via social media) is a felony... 5+ years in prison.”

*Commenter draws attention to possible federal crimes involved, ironically highlighting the legal peril of the defendants campaign.*

### **Comment activity pulled from Exhibit A-16 listed and categorized below**

*Identity Anchor Displayed: "Travess Wolford Email – Project Superintendent @ Bay Area Building Solutions"*

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### **Tortious Interference – Coordinated Employer Contact and Review Bombing**

@mass\_plumber — “imagine emailing the company about this..... 🚨🚨 Done!”

@Angelous — “Emailed, called AND reviews on Google and twitter”

@MoonStar4419 — “Don’t forget Yelp”

@BishyWahWah — “And Insta. [写真]”

@user89799699659565 — “Looks like reviews are getting deleted off google”

@Davison — “lol 😂”

@Elizabeth — “Definitely need an update”

@Cat enthusiast “🌸🦋 — For educational purposes, what’s the phone number. 📞”

*These comments indicate deliberate attempts to flood employer communication channels with false claims and review bomb tactics to inflict reputational and economic harm. This meets the threshold for tortious interference with business relationships and employment.*

---

### **Civil Conspiracy – Group Planning of Harassment and Monitoring Impact**

@mass\_plumber, @Angelous, @MoonStar4419, @BishyWahWah, @user89799699659565

*The above comments reveal coordinated group efforts to harm an individual’s employment through synchronized online actions, including calling, emailing, and manipulating public reviews. This constitutes civil conspiracy when based on provably false defamatory content.*

---

### **Employment Targeting (Repeat Reference)**

@Kathy Holt — “Bay Area Building Solutions, this is sick”

@Michelle Gonzalez — “Oh he just posted 10 hrs ago basically begging for help that an influencer sent a mob after him to cancel him 🚫🚫🚫”

*These commenters further affirm the employment targeting narrative and openly mock the real-life harm caused, confirming malicious intent and emotional distress components.*

---

## **False Review Campaign and Digital Sabotage**

@user89799699659565 — “Looks like reviews are getting deleted off google”

*Evidence of sabotage campaigns not just against an individual but the employer’s digital reputation infrastructure, triggered by false claims—expanding liability to platform moderation failure.*

## **Comment activity pulled from Exhibit A-17 listed and categorized below**

*Identity Anchor Displayed: "Travess Wolford Email – Project Superintendent @ Bay Area Building Solutions"*

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### **False Criminal Framing – Amplified Accusation of Illegality**

@Dudddeeeee — “Murder is not legal, believe it or not.”

@Julie Sbrocco — “They arrested a guy in Dunedin, FL for making a comment like this.”

@Floridian Druid — “Yep! They did! [写真]”

@Ted — “I love this so much for him!”

*These comments collectively construct a false and inflammatory legal narrative — that the user has committed a criminal offense. The mention of “murder” and comparison to arrests in Florida is a direct attempt to frame the user as a violent criminal. This meets the threshold for defamation per se and incitement to digital mob action.*

---

## **Cyberstalking / Conspiratorial Targeting Pattern Affirmed by Creator**

@Floridian Druid — “Yep! They did! [写真]”

*The defendant directly affirms and celebrates the false legal framing, reinforcing a pattern of stalker engagement and audience mobilization around targeting.*

---

## **Political Targeting – Ideological Framing of Harassment**

@Concerned4democracy — “Here’s where I have confusion... Their candidate won, and they’re angrier than ever... because they voted for him and they approve of what he’s going to do?”

@Floridian Druid — “Right! During the entire 4 years of the Biden admin, I never once said, commented, or even joked about harming anyone.”

@Cyrus Chubinen — “because they’re a bunch of angry people who have failed at life and blame everybody else...”

@JOldham\_Artist — “they’re sore winners.”

@MoBee — “That’s a problem. We can’t just vote and then sit back. That’s not how our system works...”

*These comments further anchor the campaign in divisive ideological warfare — framing the user not just as an individual, but as a political target. The attacks are rooted in perceived partisan alignment, weaponizing political stereotypes to justify harassment.*

---

## **Civil Conspiracy – Creator and Commenters Cross-Amplifying Harassment**

@Floridian Druid + @Julie Sbrocco + @Ted + @Dudddeeeee

*These accounts collectively demonstrate comment section manipulation designed to frame the user as criminally liable, while encouraging followers to interpret speech as criminal conduct.*

*The defendants affirming response escalates the liability chain to include direct influencer incitement.*

### **Comment activity pulled from Exhibit A-18 listed and categorized below**

*Identity Anchor Displayed: "Travess Wolford Email – Project Superintendent @ Bay Area Building Solutions"*

---

#### **Civil Conspiracy – Coordinated Employer Targeting**

@Abe —” Would love an update regarding the employer’s response”

@Floridian Druid — “Hopefully when they open up Monday! We can all do our part and let them know what we think of Travess and his views on unaliving people”

@JA\_NYC\_Chiney — “Sent to his employer 🎧”

@Denise uwu — “google review sent”

@Michael Jones — “Traviss has a HR meeting 🙌”

*This is an open coordination thread. The defendant calls for audience-wide employer pressure based on defamatory framing ("views on unaliving people"), which constitutes direct incitement of tortious interference. Viewers affirm they followed through via employer contact and Google reviews.*

---

### **Tortious Interference – Harassment via Third-Party Business Channel**

@Floridian Druid — “Let them know what we think of Travess and his views...”

@JA\_NYC\_Chiney — “Sent to his employer”

@Denise uwu — “google review sent”

*Users are not speculating. They are acting on incitement. These comments confirm that followers contacted Bay Area Building Solutions with the intent to cause economic and reputational harm — qualifying as tortious interference and civil conspiracy under Florida law.*

---

### **Mockery & Defamatory Amplification**

@Barrettscott90 — “I bet you he didn’t see that one coming.”

@Kelsey Biggs21 — “idk I was always taught pedestrians had the right of way”

@Andrew C — “OH NO. THE CONSEQUENCES OF HIS WORDS AND ACTIONS.”

*These posts confirm an orchestrated digital punishment ritual, with users celebrating the perceived damage to the user’s employment and image. This is reputational harassment compounding the interference campaign.*

---

### **Digital Surveillance / Obsessive Monitoring**

@Abe — “Would love an update...”

@Floridian Druid — “Hopefully when they open up Monday...”

*The reference to a specific weekday and a corporate schedule confirms obsessive monitoring of third-party business operations — an aggravating factor for cyberstalking claims.*

#### **Comment activity pulled from Exhibit A-19 listed and categorized below**

*Identity Anchor Displayed: "Travess Wolford Email – Project Superintendent @ Bay Area Building Solutions"*

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#### **Tortious Interference – Direct Incitement to Investigate Employer**

@katishasellers — “Bay Area building solutions this is who you hire!”

@Susan Gomez67 — “wow what was it again, Bay area building, we will look it up. done.”

@Floridian Druid — “This was two weeks ago, I’m pretty sure Travess is no longer employed there”

*This sequence continues the employer-targeting campaign. Commenters announce intent to investigate or act against Bay Area, while the defendant amplifies and affirms an employment consequence as a direct result.*

---

#### **Civil Conspiracy – Encouraging Offline Pressure**

@Kevin P. — “Should protest around the company and see if he’s bluffing”

@Floridian Druid — “Nah, he was fired”

*This goes beyond digital interference—escalating toward potential real-world disruption. The suggestion of physical protest solidifies the conspiracy to damage reputation and livelihood.*

---

### **False Light / Defamation Per Se – Moral Framing of Employment Loss**

@Candi Garrett — “People are mad because he has consequences for his own actions... maybe just don’t be a horrid person... nowadays they feel like their hate should just be accepted.”

*The implication is that the user deserved firing for being a morally defective person, which falsely and publicly frames the user as an unethical or dangerous individual—qualifying as defamation per se and false light invasion of privacy.*

---

### **Cyberstalking – Location Disclosure & Tracking**

@ziatomneylatlaw — “This guy lives in CALIFORNIA”

@Floridian Druid — “He does not he lives in St. Petersburg Florida”

*This constitutes targeted doxxing behavior, correcting a false location to confirm a real one for the benefit of harassers. Combined with prior incitement, this expands the threat footprint.*

---

### **Digital Surveillance – Recurring Public Updates**

@TheRealityRoam — “What was the outcome a month later?”

@Floridian Druid — “Check out my playlist Temu Adam Sandler below for all updates!”

*This shows a sustained monitoring and reporting system by the defendant, updating viewers as if managing a live punishment campaign. It feeds ongoing defamation and group stalking.*

## **Exhibit A-20 – Comment Thread Breakdown**

*Identity Anchor Displayed: “Travess Wolford Email – Project Superintendent @ Bay Area Building Solutions”*

---

### **Tortious Interference – Incitement Toward Employer Contact**

@Zuni Bengal — “Bay Area building needs to hear from us.”

@Floridian Druid — “Nah, this was two weeks ago. They fired him now he’s going to sue everyone.”

*Direct suggestion to contact the employer, acknowledged and confirmed by the defendant with reference to firing – substantiating the impact of the interference.*

---

### **Cyberstalking – Protest Monitoring, Persistent Surveillance**

@Zuni Bengal (replying to creator) — “ Good luck to him. I’ll be watching for him at the next protest.”

*This is a clear act of targeted surveillance, publicly admitting intent to track user’s in-person presence. Escalates beyond online harassment into potential real-world stalking.*

---

### **Digital Surveillance – Ongoing Tracking Infrastructure**

@POV Skyn — “Update?”

@zazu — “Need update”

@Floridian Druid — “Check out my Temu Adam Sandler playlist, should be able to click it on the bottom of this video for all updates.”

*This shows the continued, structured tracking of the case, reinforcing digital surveillance infrastructure and enabling ongoing group harassment.*

---

### **Civil Conspiracy – Protest Framing + Firearm Implication**

@Tobin Frost — “Most protests become un-peaceful... so it’s important that protesters keep in mind... concerned about their safety. AND Florida § 790.06...”

*References to protest escalation and firearm law are potentially ominous. The tone implies a threat context. When paired with the creator’s admitted campaign, this edges into coordinated civil intimidation.*

---

### **Additional Identity Tagging**

@Lowkey — “Following now”

@tanno — “Florida, lol. I love how they think that’s a brag”

*These comments, while less aggressive, reinforce engagement clustering around the user’s state and perceived social identity. It maintains the location-specific targeting trend.*

### **Exhibit A-21 – Comment Thread Breakdown**

*Identity Anchor Displayed: “Travess Wolford Email – Project Superintendent @ Bay Area Building Solutions”*

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## Defamation Per Se – Imputation of Criminal Conduct

@Ethan “Stitch” Martin — “Just a heads-up, deliberately using your vehicle to hit someone—even if they’re protesting—isn’t some “Florida loophole.” It’s called vehicular assault, and if they die, that’s vehicular homicide.”

*Explicitly accuses the user of a felony-level crime (vehicular homicide). No qualifiers or satire—this is a direct legal accusation publicly broadcast to thousands. Classic defamation per se under criminal imputation.*

---

## Mocking Identity Anchor – Mass Branding with Derogatory Label

Multiple users:

- @Temu Adam Sandler 🤡
- @kxyesuzoe976 — 🤡🤡🤡
- @JoeyCcap — “that’s an insult to Adam Sandler”
- @Juanita — 😂😂😂
- @Pill — 🤡🤡🤡

- @Yancy777 — 🤣🤣
- @Joeyfleming3 — “Temu Adam Sandler”

*This is a coordinated meme-based mockery campaign centered around the "Temu Adam Sandler" label. It creates a digital identity anchor used in search queries and repost threads, reinforcing defamation through repetition and ridicule. While not legally defamatory on its own, it bolsters the group stalking ecosystem.*

---

### **Civil Conspiracy – Coordinated Acknowledgement of Harassment Campaign**

@Jaimes Lee 77 — “Isn’t that the same guy who’s on a campaign against Tizzy for calling him out? 🤔”

@Floridian Druid — “Yes”

*This exchange explicitly acknowledges the retaliatory ecosystem. The defendant confirms ongoing targeting of the user, reinforcing intent and awareness of the cause-and-effect chain, strengthening civil conspiracy liability.*

---

### **Tortious Interference – Review Targeting**

@BIGSTAXXXX — “Left that review 🙏”

*Confirms direct action was taken to damage the user's professional standing or employer relationship, constituting tortious interference.*

---

### **Criminal Threat Undertone – Escalation Invitation**

@Dj anthony — “Bring it”

*While vague, the tone reflects potential encouragement of escalation or conflict. Given the context and other direct accusations, this adds to the hostile digital environment and implied threat posture.*

On or about June 17, 2025, Defendant, Michael Tenenblatt published a second video targeting Plaintiff on the TikTok platform. This video was posted under the username @druid\_of\_justice and is accessible at the following URL:

[https://www.tiktok.com/@druid\\_of\\_justice/video/7517038414999457054](https://www.tiktok.com/@druid_of_justice/video/7517038414999457054)

In this video, Defendant made the following verbatim statement:

*“Update on Travess — sorry I'm not in my normal get-up but it was just too exciting I had to let you 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 — and 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.”*

---

### **Legal Dissection of Defendant's Statement:**

#### **(a) Continued Targeting and Harassment**

*“Update on Travess... I had to let you know...”*

- This establishes Plaintiff is still under surveillance and being actively monitored across platforms.
- Defendant again uses Plaintiff's first name, anchoring the target identity for a general audience.
- The phrase *“I had to let you know”* confirms an ongoing relationship of digital monitoring and reporting, strengthening the pattern of cyberstalking (Florida Stat. § 784.048(1)(d)).

---

#### **(b) Employment Disruption / Implied Job Loss**

*“...I am proud to announce he's gone — and what I'm sure was an eventful Monday morning at his job, if he still has one.”*

- This statement signals direct intent to disrupt Plaintiff's employment and pride in potentially causing economic harm.
- "*If he still has one*" is a rhetorical device suggesting successful interference.
- Together, these constitute tortious interference with a business relationship and provide circumstantial evidence of malicious intent.

---

### **(c) Admission of Collective Harassment**

*"It's all thanks to you guys... I couldn't do what I do without your help."*

- This is a textbook admission of crowd-sourced harassment.
- Defendant is attributing the campaign to a network of users ("you guys") and positioning himself as a central amplifier, which exposes him to liability for civil conspiracy, platform-induced harassment, and joint tortfeasor claims.
- It also satisfies the element of pattern and intent under Florida's cyberstalking statute, where actions are carried out via electronic communication with repeated conduct.

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#### **(d) Direct Link to Original Defamer (TizzyEnt)**

*“...between Tizzy’s post and my post...”*

- This is a public linkage to **Michael McWhorter AKA TizzyEnt**, confirming that Florida Druid was aware of the larger, initial defamatory campaign and chose to act in concert.
- This satisfies the requirement for knowledge and coordination, establishing Florida Druid as a knowing amplifier of defamation *per se*, not merely an observer.
- The phrase invites inclusion in any later-filed joint conspiracy action naming McWhorter and co-amplifiers.

---

#### **(e) Platform Amplification Acknowledgment**

*“I am literally just the platform to amplify voices.”*

- This is a key admission of role.
- Defendant is not simply expressing opinion — he is positioning himself as an operational distribution hub for harassing content.

- That quote undercuts any future Section 230 defense (claiming neutral moderation) and affirms amplifier liability for known false and damaging statements.

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#### **(f) Call to Action / Sustained Harassment**

*“Let’s keep up the good fight... never stay silent, never back down.”*

- This is a public incitement to ongoing digital harassment and surveillance of Plaintiff, satisfying elements of both intentional infliction of emotional distress and cyberstalking under Florida law.
- It further escalates the behavior despite prior fallout from the original post, demonstrating reckless disregard for harm already inflicted.

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Plaintiff will submit multiple exhibits in connection with this video to demonstrate:

- The timing of the video’s release (following prior account disruptions and widespread harassment).

- The pattern of cyberstalking and targeted employment interference initiated or encouraged by Defendant.
- The public acknowledgement of conspiracy and amplification in concert with Michael McWhorter (TizzyEnt).
- The audience response and comment threads (**to be filed as Exhibits A-22 through A-26**), documenting the echo chamber of harassment that followed.

Following the initial publication of Defendant's June 15, 2025 video, Plaintiff endured an immediate and severe surge of digital harassment, including defamation, cyberstalking, and coordinated reputation attacks across multiple platforms. In response to this sustained targeting, Plaintiff began mass-blocking thousands of individual TikTok accounts starting on or about July 1, 2025, cutting off stalkers' ability to comment, view, or interact directly with Plaintiff's content.

Almost immediately following this mass-blocking campaign, Plaintiff observed a dramatic reengagement spike on the original defamatory video posted by Defendant. Prior to July 1, the video had accumulated approximately **700,000 views**. By **July 11, 2025**, the view count had surged to over **1.1 million**, with a new wave of comments and interactions appearing in direct temporal alignment with the blocking actions.

This reengagement reflects a clear-cut cause and effect: stalker accounts that lost access to Plaintiff's page returned to the source node of the harassment — Defendant's video — to reassemble, reengage, and further circulate the defamatory content. The pattern demonstrates

obsessive surveillance, ongoing cyberstalking, and continued algorithmic harm long after the video's initial publication.

The comment activity exhibits two distinct clusters:

- **First wave:** Initial surge between **June 15–17, 2025**
- **Second wave:** Renewed activity beginning **immediately after July 1, 2025**

This temporal segmentation confirms the behavioral pattern of cyberstalkers circling back to the origin point of defamation after being blocked — thereby re-exposing Plaintiff to renewed harm via Defendant's platform.

**Exhibits A-27 through A-32** include screenshots of the TikTok comment thread on Defendant's June 15 video, demonstrating the sharp gap and subsequent reengagement. These screenshots display full timestamps, usernames, and user interactions. Additionally, the bottom-right corner of each screenshot includes the Plaintiff's computer date and time, confirming that these images were captured on **July 11, 2025**, during the drafting of this complaint.

In the immediate aftermath of Defendant's defamatory video campaign, conspirators mobilized to target Plaintiff's then-employer, Bay Area Building Solutions, a company with which none of the online participants had any prior relationship, history, or business dealings. These attacks were not incidental — they were incited, energized, and sustained by the defamatory narrative published by Defendant, which falsely framed Plaintiff as a violent extremist and encouraged further amplification.

**Exhibits A-33 through A-41** document a portion of this fallout: a coordinated attack on Bay Area Building Solutions' public reputation through the posting of dozens of malicious, false, and defamatory Google business reviews. These reviews contain language and themes traceable to the narrative introduced by Defendant and widely echoed in his comment sections.

However, these reviews represent only one component of the targeted harassment campaign. The company's entire digital and operational presence came under siege. Conspirators extended their attacks to the company's LinkedIn page, targeting vendor relationships, third-party business connections, and public comment sections with reputational smears. The digital harassment was accompanied by a wave of real-world disruption, including:

- **Hundreds of phone calls** to various internal lines
- **Defamatory emails** sent to both general and employee-specific addresses
- **Direct communications** aimed at business leadership, using language derived from the defamatory TikTok content

This pressure campaign materially disrupted business operations and reputational standing. As stated previously in this complaint, Plaintiff was wrongfully terminated by Bay Area Building Solutions, not as a result of protected speech or political expression, but as a direct consequence of the sustained, coordinated harassment triggered by Defendant's content and its amplification network. The campaign caused not only reputational harm but also a functional breakdown in the

company's ability to operate, forcing its leadership and affiliates into a posture of reputational triage.

As a result of this sudden loss of income, combined with widespread reputational damage that made securing new employment extremely difficult, Plaintiff was forced to list his personal residence for sale during unfavorable market conditions. Plaintiff had previously intended to hold the property for several decades and had formal plans to construct an accessory dwelling unit (ADU) accessible via the rear alley on his oversized double lot. Plaintiff had already commissioned and received professional site plans for this development, submitted here as

**Exhibit A-42.**

This unexpected divestment represents not only a loss of current equity, but also the permanent forfeiture of future rental income from two separate dwellings, as well as eligibility for local tax credits and incentive programs offered to homeowners constructing ADUs within city limits. The financial and long-term planning consequences of Defendant's incitement have been both immediate and irreversible.

The fallout from Defendant's original publication did not remain confined to TikTok. **Exhibits A-43 through A-56** document the cross-platform republishing, amplification, and weaponization of the defamatory content across Meta's ecosystem—specifically, the public Facebook page of Plaintiff's former employer, Bay Area Building Solutions. This cross-pollination demonstrates not only the continuing injury caused by Defendant's original content, but the strategic targeting of Plaintiff's livelihood by individuals with no connection to the business in question.

Defamatory TikTok content, initially seeded by Defendant and shaped to frame the Plaintiff as advocating vehicular manslaughter or threatening lives, was intentionally reposted in Facebook

reviews and comment threads on Bay Area Building Solutions’ official page. Multiple individuals, acting as rebroadcasters, tagged Plaintiff by name and job title while stating that he had “threatened to run people over,” “wanted to kill them,” or “was a racist who publicly supports murder.” These allegations were not opinion—they were false criminal imputations presented as fact, tied directly to Plaintiff’s employment, and visible to current and potential clients of Bay Area Building Solutions.

This was not protected speech. It was a **coordinated digital operation** designed to:

- **Collapse client trust in Plaintiff**
- **Pressure Bay Area Building Solutions to sever ties**
- **Sabotage Plaintiff’s future job prospects through reputation collapse**
- **And exploit Meta’s platform mechanics to rapidly rebroadcast defamatory material**

Furthermore, these reviews violate Facebook’s own content policy on coordinated harassment and false statements in business reviews. Yet they were published, visible, and algorithmically elevated—further implicating platform negligence and serving as a digital graveyard of Plaintiff’s reputation.

The cumulative impact of this defamatory cross-publication is catastrophic. The Facebook reviews exist as direct evidence of tortious interference—not only with Plaintiff’s prior employment but with ongoing job market prospects in the region. These are not passive or casual

remarks. They are active lies, rebroadcast with malicious intent, and attached to the Plaintiff's full legal name, likeness, and employer.

The same falsehoods underpinning this lawsuit were ultimately posted on the digital storefront of Plaintiff's employer, visible to clients, competitors, hiring managers, and trade partners. That act alone completes the circuit of reputational and economic sabotage. The campaign began with a lie, and it metastasized into an attempt to destroy Plaintiff's professional future using the infrastructure of big tech that can exponentially amplify a false narrative that plaintiff will forever have to consider its implications in every aspect of his personal and professional life.

#### **IV. CAUSES OF ACTION**

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##### **COUNT I – DEFAMATION PER SE**

**(Against Defendant Michael Tenenblatt “Floridian Druid” and John Does 1–50)**

1. Plaintiff realleges and incorporates by reference all preceding paragraphs.
  
2. Under Florida law, a statement is defamatory per se if it falsely imputes:
  - A criminal offense;

- Professional misconduct or incompetence;
- Behavior incompatible with the proper conduct of one's occupation.

3. Defendant, Michael Tenenblatt, using the TikTok account @druid\_of\_justice, published false statements that:

- Named Plaintiff directly;
- Attributed to Plaintiff violent criminal intent (e.g., premeditated vehicular assault);
- Labeled Plaintiff as a political extremist and public threat;
- Implied Plaintiff was terminated for cause due to the truth of these allegations.

4. These statements were broadcast to the public on a viral video which reached over 1.1 million views, causing widespread reputational fallout.

5. Statements were made with actual knowledge of falsity or reckless disregard for the truth, with no legal privilege.

6. As a result, Plaintiff suffered:

- Reputational damage across professional and personal domains;
- Harassment by thousands of third-party viewers;
- Job loss, economic hardship, and forced property liquidation;
- Emotional distress and fear for personal safety, inclusive of credible death threats;

7. Defamation per se presumes damages under Florida law. Plaintiff further seeks punitive damages due to Defendant's willful malice and repeated publication.

8. **John Does 1–50** are named to preserve claims against individuals who echoed, republished, and amplified these defamatory claims through coordinated digital conduct.

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## **COUNT II – TORTIOUS INTERFERENCE WITH BUSINESS RELATIONSHIP**

**(Against Defendant, Michael Tenenblatt “Floridian Druid” and John Does 1–50)**

1. Plaintiff realleges and incorporates by reference all preceding paragraphs.

2. Plaintiff had a valid employment relationship with Bay Area Building Solutions, which Defendant and third-party participants willfully disrupted.
3. Defendant knew or should have known of this relationship and directly referenced the employer by name in defamatory videos and comment threads.
4. Defendant's conduct led directly to:
  - Dozens of false and malicious Google reviews (Exhibits A-33 through A-41);
  - Targeted phone calls and emails to the employer;
  - Vendor interference and LinkedIn reputational attacks;
  - Plaintiff's wrongful termination.
5. The interference was intentional, unjustified, and resulted in quantifiable economic harm, including lost wages, lost future rental income, and forced property liquidation.
6. Plaintiff names **John Does 1–50** to preserve claims against those who directly participated in the campaign to interfere with Plaintiff's employment and economic interests.

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### **COUNT III – CYBERSTALKING (Fla. Stat. § 784.048)**

**(Against Defendant, Michael Tenenblatt “Floridian Druid” and John Does 1–50)**

1. Plaintiff realleges and incorporates by reference all preceding paragraphs.
2. Cyberstalking under Florida law requires a course of conduct through electronic communications directed at a specific person, which:
  - Is intended to cause substantial emotional distress;
  - Serves no legitimate purpose.
3. Defendant engaged in a prolonged cyberstalking campaign that included:
  - Multiple videos naming Plaintiff directly;
  - References to Plaintiff’s employment, geographic location, and legal content;
  - Celebratory posts upon Plaintiff’s termination;
  - Recurrent comment threads directing further engagement and monitoring.

4. Defendant's followers returned to the defamatory video after Plaintiff mass-blocked thousands of accounts, as shown in Exhibits A-27 through A-32, reigniting a wave of targeted digital engagement and triggering renewed harassment.
5. Defendant acknowledged and encouraged this ongoing surveillance and harassment in multiple videos, creating an environment of persistent psychological distress.
6. Plaintiff experienced sustained emotional harm, sleep disruption, social anxiety, and a compelled need to restrict access to his online presence.
7. **John Does 1–50** include users who participated in the cyberstalking effort by republishing the content, tagging Plaintiff's employer, and surveilling Plaintiff's online responses.

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#### **COUNT IV – INTENTIONAL INFILCTION OF EMOTIONAL DISTRESS (IIED)**

##### **(Against Defendant “Floridian Druid” and John Does 1–50)**

1. Plaintiff realleges and incorporates by reference all preceding paragraphs.
2. Under Florida law, IIED occurs when:

- The defendant's conduct is extreme and outrageous;
- Intended to cause severe emotional distress;
- And in fact causes such distress.

3. Defendant's conduct meets this threshold by:

- Naming Plaintiff and falsely labeling him as violent and unstable;
- Triggering mass public attacks through platform virality;
- Mocking Plaintiff's termination and life instability in follow-up content;
- Amplifying and monetizing the harassment via third-party merch stores and comment curation.

4. The harassment led directly to:

- Job loss and financial hardship;
- Public humiliation and digital targeting;

- Emotional distress and loss of housing stability.

5. **John Does 1–50** include individuals who escalated the campaign with malicious commentary, review bombing, and amplification of false claims.

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## **COUNT V – CIVIL CONSPIRACY TO COMMIT DEFAMATION, HARASSMENT, AND INTERFERENCE**

**(Against Defendant, Michael Tenenblatt “Floridian Druid” and John Does 1–50)**

1. Plaintiff realleges and incorporates by reference all preceding paragraphs.

2. Under Florida law, civil conspiracy exists when:

- Two or more persons agree to commit an unlawful act;
- Perform overt acts in furtherance of that act;
- Causing damage to the plaintiff.

3. Defendant acted in concert with others to:

- Defame Plaintiff;
- Target his employer and disrupt his livelihood;
- Sustain a campaign of harassment designed to inflict reputational, economic, and emotional harm.

4. Defendant explicitly stated he was "just the platform to amplify voices," acknowledging coordination and reinforcement from his audience.

5. John Does 1–50 engaged in coordinated actions across TikTok, LinkedIn, Google, and email to destroy Plaintiff's reputation and stability.

6. Plaintiff seeks joint and several liability for all co-conspirators for the damages flowing from their collective conduct.

## **WHEREFORE**

Plaintiff respectfully requests that this Court enter judgment in his favor and against Defendant Michael Tenenblatt, along with **John Does 1–50**, jointly and severally, and award the following relief:

1. Compensatory damages in an amount exceeding the jurisdictional limits of this Court, to be proven at trial, for defamation per se, cyberstalking, tortious interference, and targeted

harassment;

2. Presumed general damages arising from reputational harm, emotional distress, mental anguish, and public humiliation;
3. Special damages resulting from the forced sale of Plaintiff's home, lost income, future rental loss, and loss of professional opportunities;
4. Injunctive relief enjoining Defendant and all persons acting in concert with him from further publication, amplification, or encouragement of defamatory, harassing, or tortious conduct;
5. Costs of this action and such other relief as the Court deems just and proper, including prejudgment interest.

**Plaintiff demands trial by jury on all issues so triable.**

**Respectfully submitted,**

**July 14, 2025**



**/s/ Travess Wolford**

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**Plaintiff, Pro Se**