EXHIBIT 2

DECLARATION OF TROY BREWER

Troy Brewer hereby declares as follows:

- 1. I am over 18 years of age, of sound mind, and otherwise competent to make this Declaration. The evidence set out in this Declaration is based on my personal knowledge.
- 2. I have been a Certified Public Accountant since 1996, mostly serving nonprofit organizations. I reside in Nashville, Tennessee.
- 3. My CPA firm has worked for AFLDS since approximately March, 2021. In that time, there has been unprecedented growth. I have seen significant financial growth for AFLDS attributable to Dr. Simone Gold—donations would increase after her public speaking events.
- 4. Since approximately March 2021, I have been in charge of all AFLDS financial matters, including making payroll payments to AFLDS's employees and workers. Generally, I review payroll in collaboration with the AFLDS Executive Director. Initially this was Dr. Gold, then it was Amy Landau, and since March 2022 it was Lisa Andrzejewski. I have never reviewed payroll with anyone else.
- 5. To the best of my knowledge, only Dr. Gold and I are signatories on AFLDS's financial accounts.
- 6. I understand that there is a dispute between Dr. Gold and Joseph Gilbert about control of AFLDS. I understand the matter is being heard by courts. Ever since dispute developed, I have continued to do my job just as in the past. I dispense payroll and oversee AFLDS financial matters to the best of my abilities and in coordination with AFLDS workers that I have worked with during my tenure. No processes have changed. I review the budget with the President and the Executive Director and monies are being spent exactly as they have been spent in the past.
- 7. On November 21, 2022, I requested that Mr. Gilbert return \$1.1 million of AFLDS money that had been deposited with his law firm by Dr. Gold. He did not return the money. Instead, shortly thereafter, Mr. Gilbert, Mr. Mack, and Mr. Gilbert's attorneys began threatening me and coercing me. These actions (discussed more below) are paralyzing my ability to keep AFLDS's finances operating. I feel targeted by the aggression of Mr. Gilbert, Mr.

- Mack, and Mr. Gilbert, and stuck in the middle, and I believe other AFLDS workers feel the same way.
- 8. People affiliated with Mr. Gilbert have begun threatening me and making demands that I pick sides in the organizational leadership dispute. As recent as November 29, 2022, I received a letter from Mr. Gilbert's Attorney Sally Wagenmaker demanding that I not authorize payroll for five (5) disputed employees (Gold, Lisa Andrzejewski, AJ Andrzejewksi, L. Alexander and J. Strand), even though they are all currently performing their AFLDS duties.
- 9. On November 22, 2022, I received a letter from Sally Wagenmaker stating I will be criminally liable for any payments made out of AFLDS accounts, if authorized by anyone other than the Board.
- 10.On November 30, 2022, I received a text message from Sheriff Richard Mack, Board member, threatening me. He wrote he was going to contact local law enforcement authorities to file a police report and potentially have me arrested if I do not follow Mr. Gilbert's instructions.
- 11.On November 30, 2022, I received a text message from Mr. Gilbert, purporting to act on behalf of the Board of Directors, in which he threatened law enforcement scrutiny if I did not follow his instructions.
- 12.Recently, I have learned that some payments AFLDS Board of Directors Member Joseph Gilbert requested for himself may be improper. Starting in approximately May 2022, Mr. Gilbert contacted me to tell me that I should pay him \$5,000/month over and above his \$15,000/month paycheck. I did not know the purpose of the payments, and Mr. Gilbert did not tell me. Upon review of the facts, I now believe these payments were improper self-dealing.
- 13. After May 2022, Mr. Gilbert then proceeded to contact me for extra money every month, either \$5,000 or sometimes it was \$10,000. Concerned about Mr. Gilbert's conduct, I contacted Executive Director, Lisa Andrzejewski, who expressed concern about possible financial impropriety.
- 14. Mr. Gilbert attempted to fire Lisa Andrzejewski after she confronted him about the payments.
- 15. Mr. Gilbert was already the highest paid person at AFLDS at \$15,000/month, other than Dr. Gold.

- 16. Dr. Gold has never asked me to do anything unethical, and she has asked that I merely maintain the status quo of operating AFLDS while the dispute is pending.
- 17. AFLDS never paid \$1.5 million to Dr. Gold in connection with a potential consulting agreement.
- 18. Andrea Wexelblatt, who I understand to be an affiliate of Mr. Gilbert, was started on payroll at Mr. Gilbert's insistence in July 2022 at \$3,000/month. Later in July, Mr. Gilbert demanded that I pay her \$12,000/month from AFLDS funds. This was a direct contradiction of the prior payroll review I did with AFLDS Executive Director Lisa Andrzejewski. I felt the \$12,000 amount was excessive and reported it to Ms. Andrzejewski, who ordered the lesser amount to be paid. In August 2022, Mr. Gilbert again ordered me to pay Wexelblatt \$12,000, over the objection of AFLDS Executive Director Lisa Andrzejewski, In September, Dr. Gold learned of this issue and objected to Wexelblatt's excessive pay.
- 19. On October 20, 2022, I received an email from Mr. Gilbert informing me that Richard Mack had been named Chief Executive Officer and instructing me to start paying him \$20,000/month. I was highly surprised to receive this email for two reasons. The first was that the organization was really in turmoil and it seemed ill-advised to pay a Board member such an excessive salary for minimal work. The second was that AFLDS does not have a CEO position and nobody informed me AFLDS was seeking a CEO.
- 20. I helped with payment of the Headquarters House in Naples, Florida and wired the deposits and the final payment amount. This transaction was highly transparent—many people at AFLDS, including its Board of Directors, were involved and approved. Nobody at the time considered the Headquarters House purchase transaction to be a personal purchase for Dr. Gold. Everyone involved knew it would be owned by AFLDS.

I certify under penalty of perjury that the foregoing statements are true and correct.

Dated this 1st day of December, 2022.

TROY BREWER