

EXHIBIT 3

DECLARATION OF LISA ANDRZEJEWSKI

Lisa Andrzejewski 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 began my career in 1987 as an E-911 dispatcher, and I quickly moved through the ranks of Communications Officer I, II, and III. In 1990, I transferred to the Crime Scene Unit, where I achieved the rank of Crime Scene Investigator III. In early 2000, I received the Crime Scene Investigator of the Year designation for solving a murder at the end of 1999.
3. In 2005, I transferred to the local Fire Department Financial Management Section, handling contracts, purchasing/procurement, invoicing, medical billing, grant management/writing, warehouse management, and stock for firefighting/paramedic/police uniforms and gear. Ultimately I was promoted to Supervisor over the section. I served as Chairman of the Board for the Department Benevolent Fund.
4. I received many distinguished service awards throughout my service to the community, from 1987 until retiring in 2017.
5. I have worked for Free Speech Foundation d/b/a America's Frontline Doctors ("AFLDS"), in various capacities, since 2021.
6. Currently, I am the Executive Director of AFLDS.
7. I started as an unpaid volunteer and gradually the high quality of my work was recognized, and I was hired and promoted to Executive Director. This was typical throughout AFLDS, for people to start as an unpaid volunteer and graduate to low pay then to market rates.
8. As Executive Director, I lead over 60 people who are either on payroll or paid by invoice monthly. The organization has eight sections: Operations; IT; Marketing; Security, Logistics & Procurement; Medical; Policy; News; and Citizen Corp. Each section has a director and staff underneath and I keep in contact with the directors daily. I hold a Leadership meeting every other week with the directors, and the directors relay items discussed to their staff.

9. In the non-profit arena, the Executive Director is equivalent to being a CEO. I hold the highest position at AFLDS except for Dr. Gold, who is the President and Founder.
10. 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 the courts. Ever since the dispute developed, I have continued to do my job just as in the past. I direct the day-to-day operations of AFLDS and discuss payroll with Troy Brewer, our accountant, and oversee AFLDS operations 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, Dr. Gold, and up until recently with Joseph Gilbert to ensure monies are being spent exactly as they have been spent in the past. I reviewed payroll with Mr. Gilbert on July 28, 2022, August 29, 2022 and September 28, 2022 by phone. Each time I asked him if he would like me to copy him on the final going to the CPA. He stated he had too many emails, so it was not necessary for him to be copied. It wasn't until September 28, 2022, that he wanted to be copied.
11. Dr. Gold is the top of the hierarchy and is involved in all decisions. She has extremely high standards for everyone, all the time. Because of that, as well as the nature of AFLDS's work, working at AFLDS can be very demanding. That being said, I have never seen Dr. Gold be unfair. She bends over backwards to mentor people, to give them second and third chances. Dr. Gold works nonstop. I frequently travel with her, and she will work 9 hours and 59 minutes during a 10-hour drive.
12. Dr. Gold tries very hard to be respectful of what she calls "OPM" — Other People's Money. This is a big theme for her. Both on the nitty gritty — to not overspend — but also the bigger conceptual issue that the root of corruption is spending other people's money more liberally than we would spend our own. She lives this way also — she is not extravagant; she is not wasteful. When I accepted the Executive Director position, she wanted me to assure her that I understand her views and to continue being "good stewards" of the people's money. She role models this daily and I in turn model this to others.
13. I had a very good relationship with Mr. Gilbert right up until the moment I confronted him on September 28, 2022 about him being paid extra money every month directly by the AFLDS CPA, Troy Brewer.

14. Prior to that, the only conflict I had had with him was when he insisted on overpaying Andrea Wexelblatt. That was shady to me. Andrea was a low-medium-level person, and she was just starting in a different role. Dr. Gold always started “low & slow,” and Andrea was offered a part-time media manager position at \$3,000/month. This was perhaps a week or two prior to Dr. Gold going to prison.
15. What happened here was that Gilbert wanted to pay Andrea, who is his assistant, an excessive amount, \$12,000 per month.
16. I was the sole person with authority over payroll. I don’t care what Mr. Gilbert says. I don’t know if Board members are supposed to have some technical authority over payroll, but the reality is that Board members such as Mr. Gilbert had never once interfered in what I paid AFLDS’s workers. If Board members such as Mr. Gilbert had that type of control, then it would have happened with other people too. It never did.
17. He and I discussed her pay on July 28, 2022, and he forced his way, telling me to pay her whatever she thinks is fair because “I’m telling you, Lisa, she is worth every penny.” He said she should be placed at the same pay as my pay.
18. I was upset that Andrea was receiving pay of \$12,000 per month and “**her team**” (Studio 17) were also to receive a payment of \$5,000 per month. I brought my concerns to Joey in that July 28, 2022 conversation, saying this is unethical, as Andrea supervises this team and they were “her people.” This was only a couple of days after Dr. Gold went to prison and honestly, I didn’t know what to do and felt intimidated by Mr. Gilbert’s tone. He led me to believe that **He** was the one in charge and I had to follow him while Dr. Gold was incarcerated.
19. On August 29, 2022, I went over payroll again with Mr. Gilbert. Andrea’s team was to be raised to a monthly payment of \$10,000 each. Again, I stated my concerns regarding this team’s pay only to be overruled by Mr. Gilbert.
20. On September 28, 2022, Gilbert and I discussed payroll, specifically Andrea’s pay and the pay for Studio 17 (her team). We came to the agreement of \$8,500/month for Andrea until Dr. Gold returned. This is also when I confronted Gilbert about the fact that I had also found out that Gilbert had been bullying the accountant to pay him thousands of dollars extra per month, for months. His response was, “well Lisa, I have been

wearing many hats.” I turned the payroll in to the CPA, Troy Brewer. Shortly afterwards, I was cc’d by Mr. Gilbert in an email to the CPA stating to return Andrea to \$12,000 that month and then go to \$10,000 the month after. Again, just like he did for the extra \$5,000 for himself, he went straight to the accountant and got Andrea overpaid.

21. To the best of my knowledge, \$12,000/month is almost the highest salary at AFLDS. For example, that is my salary. That is the salary of several of the Directors. That is the salary of the Security, Logistics & Procurement Director. The Medical Director is only \$10,000. The Operations Director is \$8,000, and the Communications Director is \$8,000. All these people worked their way up the ladder in the organization. It was wildly inappropriate to bring in someone to a new role and start her at the top salary in the organization. Inappropriate and demoralizing. It was the type of corruption that we at AFLDS fight.
22. Shortly after Dr. Gold was released, I told her about these events. She was furious and she confronted Gilbert around that time, and I do not know all the details around that. I do know that Wexelblatt continued to be paid the high amount for the third month but that, right around that payroll, Dr. Gold confronted Gilbert insisting he resign and, when he did not, she formally complained to Gilbert, Richard Mack, Jurgen Matthesius, and attorneys Fulton and Wagenmaker. Dr. Gold told me Wagenmaker told her they would investigate.
23. A few days after that, it was apparent no investigation had started, because no one had been called or queried. There was a Board meeting on October 14, 2022.
24. At the October 14, 2022, meeting, Mr. Gilbert and Mr. Mack were both highly disrespectful and dismissive. Mr. Gilbert literally implied I was an assistant to him and Mr. Mack thought I was a secretary. The secretary, Sarah Denis, was on the Zoom also. Mr. Mack argued with me that I was not the Executive Director. I stated that I am in fact the Executive Director. Mr. Mack says, “no you’re not, you haven’t been in every board meeting that we’ve had.” Neither one seemed to have any idea that I had been the Executive Director for more than seven months at that point. Mr. Mack was rude, dismissive, and sexist. All I asked/recommended was that Mr. Gilbert should be removed from the Board pending the outcome of the “investigation” (of which there was no evidence one was occurring), as this

is the most ethical way to proceed. Mr. Mack, a 70-year-old male Sheriff, said that he felt “threatened” by me, a middle-aged woman on Zoom.

25. Mr. Gilbert was singing my praises in a conversation between himself and Mr. Andrzejewski on September 26, 2022. Then, once I confronted him on September 28, 2022 with his hand in the cookie jar so to speak, he had in-house counsel, Adam Fulton, tell me via email on October 20, 2022 that I was terminated. No reason was listed, and later Sally Wagenmaker said it was because I demanded Gilbert resign. That is not what I said (although morally he should have). I said *Dr. Gold* said he should resign.

26. I hired an employment attorney and served Mr. Gilbert with notice of my intent to file a Whistleblower (retaliatory) lawsuit. The facts are very straightforward. Should Mr. Gilbert not be removed from AFLDS, I will continue this lawsuit. Should he be removed, I will drop this lawsuit.

27. Should the outcome of this lawsuit reflect Mr. Gilbert in charge of AFLDS, the organization will regrettably fold. Too many of the staff have witnessed the lies/corruption presented to us in meetings and in emails from the “silver tongue” of Mr. Gilbert. I would say there would be approximately 10 (out of the more than 60) AFLDS workers that would stay under his command. Even some of the 10 are seeing the evil doings and are leaving.

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

Dated: 12/2/2022.

DocuSigned by:

Lisa Andrzejewski

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LISA ANDRZEJEWSKI