

EXHIBIT 6

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA FORT
MYERS DIVISION

FREE SPEECH FOUNDATION,
INC. d/b/a AMERICA'S
FRONTLINE DOCTORS, an
Arizona nonprofit corporation.
and JOSEPH GILBERT,

Plaintiffs,

v.

Case No.: 2:22-cv-714-SPC-NPM

SIMONE GOLD,

Defendant.

_____ /

DECLARATION OF GEORGE WENTZ

George Wentz, pursuant to 28 U.S.C. § 1746 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 the foregoing Declaration is based on my personal knowledge.
2. I am a partner with the Davillier Law Group, and I have been practicing law for approximately 39 years, mostly in complex commercial litigation. I currently reside in Sandpoint, Idaho, and I previously was the managing partner of a national firm's office in Miami, Florida.

3. I represented GoldCare Health & Wellness, LLC and various related entities (“GoldCare”) in certain matters related to interactions with Free Speech Foundation, Inc. d/b/a America’s Frontline Doctors, Inc. (“AFLDS”). While GoldCare is owned by Dr. Simone Gold, I did not represent Dr. Gold personally. This Declaration does not reveal any privileged communications or materials.
4. As a result of my interactions with AFLDS, I interacted with Dr. Gold, Joseph “Joey” Gilbert, and directors and employees of AFLDS during the fall of 2021 and the winter of 2021-22.
5. I understand that the “principal place of business” of AFLDS is at issue in litigation. As discussed below, the vast bulk of AFLDS’s business operations are located in Naples, Florida.
6. In approximately November 2021, Dr. Gold, then the undisputed Chairman of the Board of Directors and CEO of AFLDS, wished to locate AFLDS’s operations to Naples, Florida.
7. Dr. Gold expressed a desire to create a “mini campus” in Naples, Florida, with a large house for fundraising and executive functions, and a separate rental house as a workspace called the “Team House.” The idea expressed by Dr. Gold was for AFLDS to have a headquarters-like campus, allowing employees to work together and to meet with doctors and legal team members, some of whom would be visiting, to pursue AFLDS’s nonprofit and advocacy mission. On

various occasions, I discussed the Naples, Florida campus approach with Joseph Gilbert as well as then General Counsel of AFLDS, Thomas Gennaro.

8. I visited the AFLDS “mini-campus” in Naples, Florida on approximately February 9, 2022, during which time I saw and interacted with numerous employees working on-site at the two houses. A virtual Board of Directors meeting was conducted from the Naples Freedom Headquarters, LLC house, and Dr. Gold and I attended from that location. That Dr. Gold and the staff of AFLDS were living and working at the Naples, Florida “mini-campus” was noted during that board meeting.
9. Dr. Gold has, to the best of my knowledge, never personally owned the property located at 799 104th Ave N, Naples, FL 24108.

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

Dated this ____ day of November, 2022.


George Wentz (Nov 17, 2022 21:18 EST)
GEORGE WENTZ