

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT IN AND FOR PALM
BEACH COUNTY, FLORIDA

CASE NO:

HILLTOP CHRISTIAN FELLOWSHIP,
INC., a Florida not-for-profit corporation,
and STEPHEN J. BYERS,

Plaintiffs,

vs.

EDWARD W. GIBBS, III,

Defendant,

_____ /

COMPLAINT

COME NOW, Plaintiffs, HILLTOP CHRISTIAN FELLOWSHIP, INC. (“Hilltop”), and
STEPHEN J. BYERS (“Byers”) (collectively, “Plaintiffs”), by and through undersigned counsel,
and sue Defendant, EDWARD W. GIBBS, III (“Gibbs” or “Defendant”), and allege as follows:

PARTIES, JURISDICTION AND VENUE

1. This is an action for damages exceeding \$50,000.00, exclusive of interest, costs,
and attorney fees, and is within the exclusive original jurisdiction of this Court pursuant to section
26.012(2)(a), Florida Statutes.

2. Plaintiff, HILLTOP CHRISTIAN FELLOWSHIP, INC. (“Hilltop”), is a Florida
not-for-profit corporation in good standing that operates a church and related religious, charitable,
retreat, and camp activities at 4741 Ashville Highway, Monticello, Jefferson County, Florida
32344.

3. Plaintiff, STEPHEN J. BYERS (“Byers”), is an adult resident of Palm Beach
County, Florida, and is Hilltop's founder and pastor.

4. Defendant, EDWARD W. GIBBS, III (“Gibbs”), is an adult resident of Jefferson County, Florida, and is otherwise sui juris.

5. Venue is proper in Palm Beach County under sections 47.011 and 47.041, Florida Statutes, because Gibbs published the Google review and attached email described below on a publicly accessible internet platform, and those publications were accessed and read by third parties in Palm Beach County, Florida.

GENERAL ALLEGATIONS

6. Plaintiffs are private persons and entities. This action does not challenge Gibbs’s right to express protected opinions or to make good-faith reports to governmental authorities. It challenges false factual assertions and implications published by Gibbs as true, including Gibbs’s republication and endorsement of an accusation that Byers was a pedophile, the false implication that Plaintiffs used Hilltop as a sham church in connection with money laundering, the false implication that Hilltop and/or Byers were responsible for or knowingly permitted the theft of guests’ mail, and the false assertion that Hilltop lacked a required health permit.

7. From approximately August 7, 2025 through April 29, 2026, Gibbs resided at Hilltop’s property under a month-to-month arrangement, together with a companion identified in Hilltop’s records as Heather Green.

8. On July 10, 2025, after receiving Hilltop’s written terms governing his stay, Gibbs emailed Byers, stating as follows: “I have definitely enjoyed the conversations, again, thank you for allowing us to stay there. We fully agree with the terms and look forward to voluntarily helping with upkeep of the grounds, supporting the vision and fellowship.”

9. On April 7 and April 16, 2026, Hilltop notified Gibbs in writing that it no longer wished to continue the arrangement and directed him to leave the property.

10. On or about April 30, 2026, shortly after Hilltop terminated his stay, Gibbs posted a one-star review of Hilltop on Google under the display name “Dude Gibbs” (the “Original Review”). A true and correct copy of the Original Review is attached as Exhibit “A.”

11. The Original Review stated, among other things: “I was kicked out for trying to help someone else monetarily and not the church”; “Four others kicked for figuring out it’s a fake church”; “No church here”; “Your mail goes missing or stolen, which is a felony”; “No health permit and Jefferson County is taking Steve Byers to court over that”; and “Wish I could post the email I sent to Florida Attorney General, JCSO, IRS and Institutions of Church Fraud.”

12. In context, a reasonable reader would understand the statements that Hilltop was a “fake church” and that there was “[n]o church” at the property as asserting that Hilltop was a sham religious organization rather than a genuine church conducting religious, charitable, and ministry activities. A reasonable reader could also understand the statement that guests’ mail “goes missing or [is] stolen” as conveying that Hilltop and/or Byers, as the persons operating the property, were responsible for or knowingly permitted criminal mail theft.

13. The Original Review also displayed images of an April 30, 2026 email authored by Gibbs (the “April 30 Email”), thereby republishing the contents of the April 30 Email to third parties who viewed the attached images. A true and correct copy of the April 30 Email and the email chain in which it appeared is attached as Exhibit “B.”

14. In the April 30 Email, Gibbs wrote that “the 5 people you have kicked out in the last month do not believe in your fake church-money laundering issues.” Gibbs also republished and affirmatively endorsed an accusation of pedophilia against Byers, writing: “One called you a pedophile! We all have emails to prove it in a court of law once charges are brought against you and Hilltop Christian Fellowship!” By repeating the accusation, claiming that he and others

possessed emails proving it, and predicting that charges would be brought against Byers and Hilltop, Gibbs conveyed to the recipients that the pedophilia accusation was true and supported by evidence. Gibbs's reference to Plaintiffs' "fake church-money laundering issues" likewise conveyed that Hilltop was a sham religious organization being used by Byers in connection with criminal financial activity.

15. The foregoing factual assertions and implications were false. Hilltop is a genuine religious organization that conducts worship, fellowship, ministry, charitable, and other church activities. At the time of Gibbs's publications, Hilltop held valid permits: (#33-57-2826972) with the State and (#33-54-2826869) the County Health departments, applicable to the operations Gibbs criticized. Neither Hilltop nor Byers has engaged in money laundering, stolen or facilitated the theft of guests' mail, or operated Hilltop as a sham church. Byers has never engaged in sexual conduct with a minor or committed any offense against a child. The accusation of pedophilia that Gibbs republished and endorsed, and Gibbs's assertion that he and others possessed emails proving that accusation, were false.

16. Upon information and belief, at the time of publication, Gibbs possessed no emails or other evidence substantiating that Byers had engaged in sexual misconduct with a minor and had no factual basis for asserting or implying that either Plaintiff was involved in money laundering. Although Gibbs claimed that "we all have emails to prove it," he identified no email or fact tending to establish that Byers had committed any offense against a child or that either Plaintiff had engaged in money laundering.

17. Gibbs knew the accusations were false, or acted with reckless disregard for their truth or falsity, because he had lived at the property for months, had direct knowledge of Hilltop's religious and charitable activities, had expressly agreed to support Hilltop's "vision and

fellowship,” and nevertheless published accusations of criminal conduct immediately after being directed to leave.

18. The Original Review and the attached images of the April 30 Email remained publicly available on Hilltop’s Google Business listing for a period of time after April 30, 2026 and before Gibbs later edited the review. During that period, the Original Review and attached images were accessed and read by third parties in Palm Beach County and elsewhere, including prospective guests, donors, congregants, ministry participants, and members of the public.

19. After receiving Plaintiffs’ written demand, Gibbs edited the Original Review by removing the attached images of the April 30 Email and several of the challenged statements. Gibbs did not publish a correction, apology, or retraction acknowledging that the removed statements were false.

20. Gibbs’s later editing of the review did not undo his prior publication of the Original Review and the attached April 30 Email. His selective removal of the challenged content after receiving Plaintiffs’ written demand is further circumstantial evidence of his knowledge of falsity or reckless disregard for the truth.

21. After publication of the Original Review, Hilltop experienced a marked decline in guest inquiries and prospective participation compared with the period preceding the review. Hilltop has suffered harm to its reputation and goodwill and economic loss in an amount to be proven at trial.

22. Byers has suffered harm to his personal and professional reputation, including his reputation and standing as a pastor and religious leader, as well as humiliation, mental anguish, and emotional distress.

23. In addition to publicly republishing the April 30 Email through the Google review, Gibbs originally sent the April 30 Email to Byers and intentionally copied multiple third parties, including Marie Rigdon at JCSO, Chris Furman, and the Jefferson County Tax Collector's Office. The publication to JCSO and the Jefferson County Tax Collector's Office constituted publication to third parties. See Exhibit "B."

24. In the April 30 Email, Gibbs published the statements quoted in Paragraph 14 above. Gibbs thereby republished and endorsed the accusation that Byers was a pedophile, claimed that he and others possessed emails proving that accusation, and conveyed the false factual implication that Plaintiffs used Hilltop as a sham church in connection with money laundering.

25. The republished and endorsed accusation of pedophilia, Gibbs's claim that emails existed proving that accusation, and the factual implication that Plaintiffs were engaged in money laundering were false for the reasons alleged above.

26. Gibbs made these publications before the institution of any criminal charge against either Plaintiff. To the extent any qualified privilege applied to Gibbs's publication to JCSO, Gibbs abused and forfeited that privilege because his primary motive was retaliation and injury to Plaintiffs' reputations rather than a good-faith effort to report known criminal conduct. Gibbs included accusations unrelated to the limited request for assistance concerning his departure from the property and disseminated those accusations to additional recipients and, thereafter, to the public through Google.

27. The facts demonstrating Gibbs's express malice include the immediate timing of the accusations after Hilltop directed him to leave; his months of firsthand knowledge of Hilltop's actual religious and charitable activities; his unsupported assertion that he and others possessed emails proving the pedophilia accusation; his failure to identify any email or fact supporting the

underlying pedophilia accusation despite expressly claiming that such proof existed; his publication of the accusations to the Jefferson County Tax Collector's Office despite their lack of relevance to that office; his public republication of the April 30 Email through the Google review; and his selective removal of the challenged content after receiving Plaintiffs' written demand.

28. Gibbs intentionally published the April 30 Email to JCSO and the Jefferson County Tax Collector's Office and subsequently republished its contents to members of the public through the Google review.

29. As a direct and proximate result of Gibbs's publications, Hilltop has suffered reputational and economic harm, and Byers has suffered reputational harm, humiliation, mental anguish, and emotional distress. Because the accusations imputed serious criminal conduct and conduct incompatible with Plaintiffs' religious and professional activities, damages are also presumed to the extent permitted by law.

**COUNT I - DEFAMATION PER SE (LIBEL) - GOOGLE REVIEW AND APRIL 30
EMAIL
(BOTH PLAINTIFFS)**

30. Plaintiffs reallege and incorporate paragraphs 1 through 29 as though fully set forth herein.

31. Gibbs published the Original Review and publicly republished the attached images of the April 30 Email through Google to third parties, including persons in Palm Beach County.

32. The publications contained false factual assertions and implications of and concerning Hilltop, including that Hilltop was a sham or "fake church," that Hilltop lacked a required health permit, that Hilltop was responsible for or knowingly permitted the theft of guests' mail, and that Hilltop was used in connection with money laundering.

33. The publications contained false factual assertions and implications of and concerning Byers, including Gibbs's republication and endorsement of an accusation that Byers was a pedophile, Gibbs's false assertion that he and others possessed emails proving that accusation, and the false implication that Byers used Hilltop as a sham religious organization in connection with money laundering.

34. The challenged statements were objectively verifiable factual assertions or, when considered in their full context, conveyed false and defamatory factual implications. They were not protected expressions of pure opinion or rhetorical hyperbole.

35. Gibbs acted at least negligently in publishing the false statements and implications and, as alleged above, acted with actual knowledge of their falsity or with reckless disregard for their truth or falsity.

36. The accusations and factual implications were defamatory per se because they falsely imputed to Byers the commission of infamous criminal conduct and conduct incompatible with the proper exercise of his duties as a pastor, and falsely imputed to Hilltop criminal financial conduct and conduct incompatible with its lawful operation as a religious and charitable organization.

37. Gibbs published the accusations intentionally, willfully, maliciously, and for the purpose of injuring Plaintiffs' reputations.

38. As a direct and proximate result, Plaintiffs have suffered the damages alleged above in an amount to be determined at trial.

WHEREFORE, Plaintiffs respectfully request judgment against Defendant, EDWARD W. GIBBS, III, for compensatory damages, presumed and general damages to the extent permitted

by law, special damages proven at trial, prejudgment and post-judgment interest, taxable costs, and all other relief the Court deems just and proper.

**COUNT II - DEFAMATION PER SE —APRIL 30 EMAIL TO JCSO AND OTHER
THIRD PARTIES
(BOTH PLAINTIFFS)**

39. Plaintiffs reallege and incorporate paragraphs 1 through 29 as though fully set forth herein.

40. Gibbs published the April 30 Email to JCSO personnel and other third parties, including the Jefferson County Tax Collector's Office, before the institution of any criminal charge against either Plaintiff.

41. In the April 30 Email, Gibbs republished and endorsed the accusation that Byers was a pedophile by writing: "One called you a pedophile! We all have emails to prove it in a court of law once charges are brought against you and Hilltop Christian Fellowship!" Gibbs also conveyed the false factual implication that Plaintiffs used Hilltop as a sham church in connection with money laundering.

42. The foregoing assertions and implications were of and concerning Plaintiffs, were false, and were published by Gibbs as assertions or implications of existing fact.

43. To the extent any qualified privilege applied to the publication to JCSO, Gibbs acted with common-law express malice because his primary motive was to injure Plaintiffs' reputations. For the reasons alleged in Paragraphs 26 and 27, Gibbs abused and defeated any such qualified privilege.

44. Gibbs published the statements with actual knowledge of their falsity or with reckless disregard for their truth or falsity.

45. The statements and factual implications were defamatory per se because the republished and endorsed accusation of pedophilia imputed infamous criminal conduct to Byers and conduct incompatible with his duties as a pastor, while the money-laundering implication imputed criminal financial conduct to Plaintiffs and conduct incompatible with Hilltop's lawful operation as a religious and charitable organization.

46. As a direct and proximate result, Plaintiffs have suffered the damages alleged above in an amount to be determined at trial.

WHEREFORE, Plaintiffs respectfully request judgment against Defendant, EDWARD W. GIBBS, III, for compensatory damages, presumed and general damages to the extent permitted by law, special damages proven at trial, prejudgment and post-judgment interest, taxable costs, and all other relief the Court deems just and proper.

Plaintiffs reserve the right to move for leave to amend to assert a claim for punitive damages upon the evidentiary showing required by section 768.72, Florida Statutes.

DEMAND FOR JURY TRIAL

Plaintiffs demand a trial by jury on all issues so triable.

RESPECTFULLY SUBMITTED this July 22, 2026.

GLACHMAN & BRILL, P.A.

/s/ Matthew Glachman

Matthew David Glachman, Esq. (FBN 98967)

Jordan Marcus Brill, Esq. (FBN 90923)

1001 Yamato Road, Suite 402

Boca Raton, FL 33431

(561) 859-0679

matt@glachmanbrill.com

EXHIBIT A

**Dude Gibbs**
Local Guide · 35 reviews · 13 photos

★ ★ ★ ★ ★ a month ago

Stayed here for 7 months while getting property cleared, permits and utilities put in and have been a Monticello resident for 4 years. Us along with 12 other RV'ers were here at the time, I was kicked out for trying to help someone else monetarily and not the church. Four others kicked out for figuring out it's a fake church and let's be honest. No church here, just 113 acre plantation house, 6700 sqft, 9 bed, 8 bath which is in foreclosure. There is no host and water smells like sewage. Your mail goes missing or stolen, which is a felony. No health permit and Jefferson County is taking Steve Byers to court over that. Wish I could post the email I sent to Florida Attorney General, JCISO, IRS and Institutions of Church Fraud.

2:48

**From: Dude Gibbs**
To: Steve@hilltopchristiancommunity.org
Cc: Maria.Rigdon@jciso-fl.org
Chris Furman
taxes@jeffersoncountytaxcollector.co
Bcc: citizenservices@myfloridalegaluc
eoclass@irs.gov
April 30, 2026 at 5:16 PM

**le: Request for Law Enforcement
assistance - Guest Departure on
May 1, 2026**

Steven J. Byers,
Heather Byers,

You have overly dramatized this situation entirely all because the 5 people you have kicked out in the last month do not believe in

2:48

Request for Law E...
Monticello community thought of Hilltop Christian Community since Heather works in town and we have lived in Monticello for 4 years. You hated my honesty but already knew the answer since you and the county are having court disputes abt the church and you failing to win election as The County Tax Collector.

services involved about you nousing 4 children who do not attend school that live above the horse barn. We have pictures and my Elog camera has video.

Technically I have 30 days from April 7th and Heather has from April 16th. How do you fly planes but cannot do simple math, go back to math class, but because we do not want to stay our full 30 days and be harassed by you, Steven J. byers, which a restraining order should be pursued by Heather and I. We will depart before May 1st to the 5 since I

EXHIBIT B

Steve Byers

From: Edward Gibbs <edwardg@williamsburginteractive.com>
Sent: Thursday, April 30, 2026 5:16 PM
To: Steve@hilltopchristianfellowship.org
Cc: Marie.Rigdon@jcsd-fl.org; Chris Furman; taxes@jeffersoncountytaxcollector.com
Subject: Re: Request for Law Enforcement Assistance - Guest Departure on May 1, 2026

Steven J. Byers,
Cherie Byers,

You have overly dramatized this situation entirely all because the 5 people you have kicked out in the last month do not believe in your fake church-money laundering issues. One called you a pedophile! We all have emails to prove it in a court of law once charges are brought against you and Hilltop Christian Fellowship! All of the Christian Organizations have been notified! IRS as well with form 13909 has been filed. This only extends the arguments between Hilltop and the Jefferson County, FL about wanting a home, located at 4741 Ashville Hwy., 6700 sqft, 9 bed, 8 bath with 113 acres deemed a church and it's not. A home, horse enthusiast Carl Bowling built.

A week prior to April 7th, you called me while I was traveling through Oregon and you got upset that I was going to help another guest in the Rv park by giving Katrina \$1000. You made a comment that I should be helping the church, which I do. \$500 for RV, \$150 for shed. You then chose to ask me what the Monticello community thought of Hilltop Christian Community since Heather works in town and we have lived in Monticello for 4 years. You hated my honesty but already knew the answer since you and the county are having court disputes abt the church and you failing to win election as The County Tax Collector.

The people of Jefferson County do not want you here!

You gave us permission to use the address along with the other people listed below. The USPS has snapshots of this history. We all have that in Emails.

Edon & Megan Babcock
Lane
William Barthel
Katrina
Cassandra Alfaro
Thomas Bowling
Richard Kemp
Dennis Fisher
Larry Marsella
Andrea Matthews

Let's also get the JCSO and Child protective services involved about you housing 4 children who do not attend school that live above the horse barn. We have pictures and my Elog camera has video.

Technically I have 30 days from April 7th and Heather has from April 16th. How do you fly planes but cannot do simple math, go back to math class, but because we do not want to stay our full 30 days and be harassed by you, Steven J. Byers, which a restraining order should be pursued by Heather and I. We will depart before May 1st to the 5 acres I own here in Monticello since we have been residents to this lovely community for 4 years.

We look forward to seeing you in court!

Edward W Gibbs

Williamsburg Interactive Logistics LLC
Monticello, FL 32344

Tanker Endorsement
Triple/Double Endorsement
TSA Certification

757-525-0021

On Apr 27, 2026, at 11:03 PM, Steve@hilltopchristianfellowship.org wrote:

Dear Sheriff McNeill:

Via: Marie Rigdon, Executive Assistant

Pursuant to Section 513.13(4) of the Florida Statutes, Hilltop Christian Fellowship ("Hilltop") respectfully requests the assistance of the Jefferson County Sheriff's Office to ensure the peaceful and orderly departure of Ed and Heather Gibbs from the park located at 4741 Ashville Highway.

On April 7 and April 16, 2026, Hilltop provided written notice to Mr. and Mrs. Gibbs, pursuant to Section 513.13(2), advising that Hilltop no longer desired to entertain them as guests and directing them to depart the premises no later than 11:00 a.m. on May 1, 2026.

The notice was issued based on conduct that has disturbed the peace and comfort of other persons and interfered with Hilltop's operations, including, but not limited to: the unauthorized use of Hilltop's business address as their own; the monitoring and handling of mail not addressed to them; statements perceived as threats to cause harm or damage to Hilltop; and conduct that has created concern regarding the safety and integrity of the property.

Hilltop has reason to believe that the Gibbs have indicated an intention not to depart as directed. Under Section 513.13, refusal to leave the premises after proper notice may constitute a misdemeanor of the second degree. Accordingly, Hilltop requests law enforcement presence and assistance to ensure their peaceful and timely departure at 11:00 a.m. on May 1, 2026.

Please advise at your earliest convenience regarding your availability and any procedures the Sheriff's Office recommends to facilitate a smooth and orderly transition.

Thank you for your attention to this matter and for your continued service to the community.

Respectfully,

Steve Byers

Steve Byers
Founder, Pastor
Hilltop Christian Fellowship, Inc.
www.HilltopChristianFellowship.org
cell 412-401-5025
4741 Ashville Highway
Monticello, Florida

cc: Ed and Heather Gibbs (via email and posting)

NOT A CERTIFIED COPY