

The following is Jaime Lawhorne's legal statement concerning Cypress Creek Organic Farms, INC and WormzOrganic, LLC. Affidavits of support are attached at the end of this statement.

In January 2012, I, Jaime Lawhorne, started a company called Tennessee Tom's Organic Tomato Farms, with the intentions of growing organic tomatoes and selling them at wholesale prices to regional and local businesses. I contacted Publix grocery store corporate offices located in Lakeland Florida, in regards to buying my organic tomatoes at wholesale prices, which Publix loved the idea of local farmers providing local organic tomatoes, and so I was introduced to the head-purchasing agent, Albert Gutasso at corporate Publix. We were all excited and so the process began.

In February 2012, I contacted Bud Ward from the Angel investment group in Florence Alabama, and after 5 or 6 meetings the Angel investment group decided to move forward with my project. My business plan was solid and we consulted with Dr. Rick Snyder at Mississippi State for technical data and the best way to grow the organic tomatoes. In addition the investment group wanted 40% of the company. The investment group wanted proof that we could grow the tomatoes like the Universities said we could, so I put two greenhouses on my family's farm in Bridgeport Alabama and grew tomatoes the entire summer and thru the fall of 2012, and in Jan 2013, I renamed the company Cypress Creek Organic Farms and incorporated in Huntsville.

Since I was reluctant to give up 40% of the company to the Angel Investment Group, I decided to recruit a few farmers and let them pay for their own greenhouses and using income claims and production data provided by the Universities of Kentucky and Mississippi, we began the CCOF Affiliate program. In this way I could maintain 100% ownership of the company and not have to hire a bunch of farm workers, because the Affiliates themselves would be the work force and because they were owners of the greenhouse, they would treat the tomatoes with TLC. Eventually, CCOF employed about 70 full-time people as support, training, install crews and delivery personnel, which all lost their employment because of a rouge reporter named Margo Gray badgering and slandering myself and our company.

I spoke with Albert Gutasso at Publix many times over the next year concerning the organic tomatoes and he and his team were excited about coming to Huntsville to view the tomatoes once the greenhouses were operational and producing fruit. There was nothing in writing except our emails, but Publix was as excited as myself about the potential of providing locally grown organic tomatoes. I also contacted Karen Wynne from the USDA and began the long process of getting organic certification and eventually contracted with Americert from Florida to complete the USDA organic certification for CCOF and all the Affiliates.

I also visited Backyard Farms in Maine and toured their 26-acre greenhouse where they produce only tomatoes for that region, and became very excited about beginning my tomato production career. At this point in time we did not have a website or office and we were only experimenting on the production of determinate and indeterminate tomato plants, growing in the ground opposed to grow bags, experimenting with worm-tea fertilizers as to avoid chemicals, various water applications, etc.

My goal was to have 300 greenhouses (100' x 20') by the end of 2013, which would eventually produce 20,000+ pounds of various tomatoes every day when in production mode. The greenhouse and all materials become the property of the farmer and CCOF would simply be the

support system and the sales agent (like the poultry industry). The farmer would receive 85% of all gross sales and CCOF 15%.

Within a few weeks about five people had responded to fliers and so began the initial contract growers. CCOF placed an advertisement on craigslist and hired Jackie Wilson as my executive assistant. She had the degree I was looking for and she was excited about the business plan. The next day Jonathan Gibson from Arab Alabama was the first person to become an affiliate grower and the first greenhouse was built on the Gibson farm.

Jackie Wilson had some great marketing ideas and wanted to advertise on the radio and so we started the "follow the tomato" campaign. We charged people \$9950, which included all materials for an entire year of production.

From January to April 2013, Jackie and I used our vehicles as our office and traveled around visiting and explaining our idea to farmers in Tennessee, Alabama and Georgia, and during that time frame we had about 20 people to become contract growers.

In April Jackie found and secured our corporate offices located in Hampton Cove.

Karen Wynne (the local USDA rep) was helping us complete the USDA organic certification and that's when we discovered the USDA rule, which states that until a person or company has sales exceeding \$5000 gross, no certification is required and you can still say that your products are organic as long as your inputs are verifiably organic, which ours were. This USDA rule gave us the ability to say and use the word organic until we were officially approved. Once we reached \$5000 in sales in middle August 2013, we had to quit selling our tomatoes and we had a bunch of tomatoes that spoiled because we could not sell them, because the USDA had not approved us as quickly as we had anticipated. Someone also complained to the USDA in May 2013, that we had the USDA organic logo on our website, and we were not officially approved yet, and so the USDA contacted us and asked us to remove the official USDA logo until we received official certification, so we complied and removed the logo and the complaint was resolved and closed.

Even though we could say we were organic without official approval until we surpassed \$5000 in sales, we still could not use the USDA logo on our website, so we removed it from our website and the USDA was satisfied.

Another complaint was filed after the Margo Gray Channel 48 news story was released about CCOF not having our USDA certification, which was due to arrive in the mail around September 10, 2013, however, as a result of the complaint, CCOF's organic certification was put on hold until after the USDA completed their investigation, which I never followed up with because CCOF was forced out of business soon thereafter.

On September 4, 2013, Margo Gray told roughly 75 CCOF Affiliates that the reason none of our Affiliates were certified USDA organic was because, "THE USDA WILL NOT CERTIFY HOOP-HOUSES AS ORGANIC". If Margo Gray would have done any research, just 10 minutes of due diligence, then she would have known the hoop-houses COULD be certified organic, which is irrelevant at this point, because the company is now bankrupt and 265 farmers and myself no longer have our dream.

It is interesting to note that the first five greenhouses (hoop-houses) received their USDA Organic certification a few weeks after the company was bankrupt from all the refunds attributed to the Margo Gray Channel 48 Raycom Media slanderous news story. Everyone that was refunded said the reason they wanted their money back was because they felt they had been lied to or deceived, which was precipitated by what Margo Gray had to say.

Our first few greenhouses were starting to produce tomatoes around June 1, 2013, and most businesses that tried some and/or sold to their customers, placed an order for more. I did not know it at the time, but my marketing staff, which was being managed by Jackie Wilson's brother, Brad Wilson, was purchasing additional organic tomatoes from the Amish growers and Ayers Market in Huntsville. Our contracted growers could not produce enough tomatoes at the time.

Let me back up. Around May 2013 Albert Gutasso from Publix contacted me and was angry that we were using the Publix name, which we were telling everyone that Publix would be offering our organic tomatoes in their stores. In earlier emails, I told Albert that people were excited that Publix would be selling our tomatoes and we talked about when his team would be visiting us in Huntsville and touring our greenhouses. Albert said they would need to see our growing methods and taste the tomatoes before we could, "seal the deal", so before Publix would visit, we needed to have ripen tomatoes growing somewhere.

But because so many people were calling the Publix corporate offices and inquiring about the CCOF affiliate program, Albert became upset and said that Publix was no longer interested in our tomatoes.

The radio personalities were saying live on the air that Publix was going to carrier our tomatoes. The growers were telling everyone that Publix was going to carry our tomatoes. It went viral fast, which was obviously overwhelming for Publix headquarters, because most everyone that was interested in growing for CCOF, would call Publix as part of their due diligence. At first Publix was okay, but then later after hundreds of calls to their headquarters, they decided to pull out. This made it look like we were lying to people.

By this time we had discontinued saying anything about Publix, but it was too late, to many people had heard it on the radio and word-of-mouth spread like wild fire on Facebook and other social media, none of which came from our corporate offices after Albert asked us to quit saying it, which we did.

In July 2013, 50 or 60 people signed up as Affiliate growers and in August 2013, another 96 people signed up and there were over 120 people scheduled to sign up in September 2013. We had eight crews building the greenhouses and we were still behind schedule and there were three new install crews being trained.

After Publix canceled our relationship, Star Market in Huntsville started buying the tomatoes for their locations. Initially we provided a free box of tomatoes (about 20 pounds) to all restaurants that requested a box to try, which was advertised on WDRM by live radio personalities as giveaways; if you had a retail outlet, restaurant or grocery store, CCOF would give you a free box to test out. This accomplished two things, first it was the best way for retailers to try the best organic locally grown tomatoes, and second, it kept us under the \$5000 sales quota established

by the USDA until we received certification.

Before the Margo Gray smear campaign began, we had several restaurants serving our tomatoes daily, but Margo began calling all the restaurants and harassing them, and soon thereafter, most of them stopped their relationship with CCOF in fear of Channel 48 giving their restaurant bad press. Several restaurant owners that I personally spoke with said that Channel 48 could and would cause their businesses to suffer if they kept serving our tomatoes. Most people just simply believe what is reported on local TV. It is a powerful tool that can be used for good or evil. I explained to people that we sell tomatoes and Channel 48 sells media, but people believe most everything they see on TV.

Some restaurants took advantage of our marketing campaign, which if the restaurant put a "signature dish", which featured our "Cypress Creek" brand name on their menu, CCOF would authorize that restaurant to receive a 10% discount on all tomato purchases, which further branded our name and made more people aware of Cypress Creek Tomatoes.

Within a week of Margo Gray's attack, only one restaurant was still carrying our tomatoes. Most people who watch Channel 48 "Investigates" show, believe that it is a legitimate news program and very few realize that it is an entertainment show that survives from paid advertisers who demand ratings.

Another product we had already produced was "Mamacitas" organic picante sauce, which Bradley Wilson had taken to NY and was promoting the product at major hotels, which was a perfect product for our grade-B tomatoes (culls), which are great tasting tomatoes, but have spots that are unattractive for the retail-resell market. We were also in the process of developing the Tennessee Toms Organic Tomato Juice.

By July 2013, CCOF had expanded to four warehouses and we had just ordered 200 heaters for the upcoming winter harvest crops, and we had already paid \$170,000 to BWI for the heaters with an expected delivery date in October 2013, which were being delivered in two semi-trailer loads.

In early August Jackie Wilson came to me and wanted to change from growing tomatoes in the winter months to growing organic kale in the winter months, which would not require the heating systems. It made sense and I told her to get me her plan together so I could present it to the affiliates. Most would have been happy because they were going to receive a refund for the heating system and not have to pay for the fuel for winter growing, as kale will grow in cold-weather even in the snow. This would have been optional for the farmers, but it looked as though 95% of the Affiliates would have gone this route.

The BBB had been badgering us for several months about providing them with a list of our growers, which they wanted to call and question about the CCOF opportunity, and myself and several of my staff told them no, that our growers had signed NDA's and it was none of the BBBs business. In response, the BBB contacted Margo Gray at Channel 48 news and told Margo to go investigate, which I found out later that if the BBB wants a company shut down, they contact Margo Gray and she does the dirty work.

On August 28, 2013, I was away from the office when Margo called for an appointment, she

called from our parking lot for the appointment and barged into our office a few minutes later with cameras blazing and knowing I was not there. That night she ran a scam story that caused several of our Affiliates to request a \$9,950.00 refund, which we gave the refunds. And two of our front office staff quit because Margo put one on TV and the other quit because she was embarrassed to work for CCOF any longer.

The following Tuesday I invited Margo for a sit-down interview with 75 Affiliates and myself, which of the two hour interview, only a few minutes of misleading BS was all Margo used. Margo found out that I had been in Federal prison in the 1980s and that's all she wanted to talk about.

Even though we had zero complaints at the BBB, the head lady Michelle at the BBB had CCOF railroaded by Margo Gray because we refused to provide the information the BBB wanted, which the BBB is simply a private corporation with no government or official authority. Now don't get me wrong, usually the BBB does a good job, but in this case they ruined the businesses of 265 local farmers to prove a point; give us what we want or else.

Also, let's don't forget that, the BBB was started by the mafia in Chicago during the early 1900s as a way to *legitimately* extort membership fees from local businesses. I simply refused to be a part of their organization and pay their exorbitant fees and answer their accusational questions. Over the last 100 years the BBB has cleaned-up their checkered past but their bullying techniques seem to still be evident. It is my opinion that their Huntsville building should be razed and all the personnel replaced with more professional, caring individuals.

Margo told the room full of CCOF affiliates on September 4, 2013, that the greenhouses we were using were in fact not greenhouses but rather hoop-houses and that, "**THESE HOOP-HOUSES COULD NOT BE CERTIFIED USDA ORGANIC**", which that one false statement caused almost everyone in the room to ask for their money back, which some of them already had a greenhouse built with plants in the ground. CCOF gave a total of 47 refunds (\$460,000.00+), which bankrupted the company. I sold my vehicle, investing back into the company hoping to recover, but Margo Gray continued her smear campaigns and over several weeks she had our company on her scam news program almost every night until I was forced to close the doors.

A few weeks after Margo told everyone that we could not get the hoop-houses certified organic, the **first five affiliates received their USDA organic certification** in the mail, which had been processed months before but the USDA just took a long time to complete the process. I told Margo during the interview that it takes time for the Government to do anything, but her cameraman kept interrupting me saying, "TELL US ABOUT FRAUD, TELL US ABOUT FRAUD", in an attempt to stir up controversy and to sensationalize a news story that didn't exist. He also should be held responsible for unethical behavior. It reminded me of a circus act!

Margo also told the affiliates that our seedlings were not organic, which our seedlings were organic, but this false statement caused affiliates like Carol Jerald, an affiliate from Georgia, to make threats against my family and me personally, and continued to cause the company harm with her verbal attacks on social media, which caused other people to spread the bad words. It was ridiculous and a very disheartening situation. When people start talking about a scandal it's hard to talk about anything else. On the last day the office was open a mob came to lynch me, and that was the day that channel 48 made another appearance at our office, which caused all

of the remaining employees quit, and so I left and never went back.

Someone crashed into one of my personal cars, slashed the tires on three of our company work vans and burned my house on Keel Mountain to the ground. People believe what they see on TV. It's a miracle someone didn't lose their life because of Margo Gray's appetite for ratings.

I tried for several weeks to get someone new to take over CCOF but it was too late, the day before the mob showed up, Jackie Wilson had gone to Arab for a barbecue with some of the affiliates and had told them that they had better get their money back because according to news report, it was a scam, which caused the lynch mob to show up; even Jackie believed what channel 48 had said, plus she was angry towards me for not telling her that I had been to prison 26 years ago, but that was a part of my life that I was not proud of, and did not brag about it, and simply wanted to move forward, but the phrase "second chance" is just a cliché that self righteous people repeat to make themselves feel better; it doesn't exist in the real world.

I needed a new direction in order to get CCOF back on its feet, so in December 2013, I moved to Concord North Carolina and started a new company called WormzOrganic. Since the worm castings (organic soil) made up the majority of our expenses at CCOF, it only made sense to create a company that would support CCOF and it would also cut CCOF expenses for the worm castings by 80%.

It was also obvious that I could not use my real name so I created a company called, "Jim Gilley Enterprises", which Jaime Lawhorne owns, and so I became Jim Gilley to everyone in Concord North Carolina. I hired a local lady named Jennifer Langford and her father Donnie Langford and gave them 20% ownership of WormzOrganic, LLC, and told them that I had personal issues that would have negative effects on WormzOrganic and if they would agree to put everything in their name then I would give them both 10% each and a lifelong career, and they both excepted and so I started once again on December 17, 2013.

My mentor always said, "don't ask for less problems, ask for more solutions", and everyone knew that CCOF was a great company and business model and was destined to be a \$100 million company, which is why several people tried to take it over when I left. Margarite Mcintock met with myself and Mitch Howie, our corporate attorney, at his law firm in Huntsville in September 2013. It was decided that she would try and hold things together while I secured additional funding for CCOF, but instead, when I went to Concord, Margarite took the reins and then sent out a mass email to all of the affiliates telling them that I had fled the country with all their money. Then when Mitch Howie mailed her a rent check for the warehouse space that CCOF had leased from her father, Margarite sent the check back to Mitch Howie and said that she was selling the CCOF inventory as rent compensation, which was well over \$300,000 in supplies. Margarite saw an opportunity to steal and embezzle from CCOF because I was no longer there.

Cadence Bank and Regions Bank both closed all of our corporate checking accounts because of the Margo Gray news story, so I gave Margarite \$19,800 in cash to pay the last two weeks payroll, but Margarite told everyone that I skipped town and she never received any money, and she still has not paid for the greenhouse that CCOF placed on her property. I will someday repossess that from her.

One of the issues with CCOF (according to the SEC of Alabama) was a stock issue that the SEC in

Montgomery accuses CCOF of selling stock to our Affiliate growers, of course nobody ever believed that CCOF was selling stock or that they owned any part of CCOF, but to ensure this confusion was not repeated at WormzOrganic, we updated the contract so there would be no confusion. The mistakes made at CCOF were not repeated at WormzOrganic.

From January 2014 to April 2014, we recruited about 80 worm farmers, and since it doesn't cost as much to produce worm castings, we set the start up cost at \$4950. By June 2014 the people who had started back in January had already recouped their investment and it was time to get CCOF back on track.

Let me back up. At the end of March, Jackie Wilson contacted my son and told him that she had located me and was going to call Margo Gray at 48 News and tell her where I was located if I did not call her. So I called Jackie in March 2014, for the first time since I left Huntsville in December 2013. I asked her a few questions and confirmed that she in fact did know where I was located, because of a Belkin security camera that I had replugged up in my new office, which sent a snapshot photo to my old email address that Jackie was still monitoring. One mistake!

So I told her to please not tell Margo just yet and she said that if I would let her come and work with me and that she wanted to live in Concord and continue our business relationship, then she would remain silent, so I reluctantly agreed. I should not have let her back into my business. She came to Concord North Carolina and I immediately let her back into the business and she moved into a spare room at my apartment. She also agreed to use an alias name and so took her mother's maiden name and became Jackie Rose.

After a few weeks she identified a few problems and wanted to make a few changes at WormzOrganic. The main change she wanted was to fire Jennifer and Donny Langford, because they were incompetent, which as the last few months had progressed, I was seeing that they were not fit for management. So I sent Jennifer and Donnie home with pay to get them away from the business, but I had to continue paying them because everything was in their name. It was a win-win for everyone; Jackie and several other employees overheard Jennifer complaining that she felt betrayed because Jackie was brought in to replace her and that if we messed with her (Jennifer) then she would drain the corporate checking account, which was in her name. So Jackie and Haley McClure opened a second checking account at SunTrust Bank, and I authorize them to deposit \$90,000 into it, just in case Jennifer fulfilled her threat and drained the main accounts, then we would still have operating cash. By June 2014, most of the cash had been used for expenses and/or re-deposited back into the 5th 3rd corporate accounts.

I had told Jennifer Langford my real identity in April 2014, because she was getting suspicious because I could not use my name on anything, and so I told her the truth about me. She looked me up online and seemed okay with everything. She seemed excited about my past and even told me about a seatbelt scam that she had been using for years to get out of seatbelt tickets; she was counterfeiting a doctors report about her breast being worked on, then she would just change the date on the doctor report and use it for the next time she got a ticket, then the judge would just throw it out. I also told her not to tell her family about me and that it should be our secret. She agreed but demanded her income be raised from \$46,000 to \$76,000 yr and her daddy (Donnie Langford) salary raised from \$36,000 to \$62,000 yr. In addition she wanted a company vehicle, which I was forced to purchase a 2012 Mini Cooper; and she wanted her brother Chad Langford to be promoted to the position of warehouse manager. She also

demanded her daddy be paid under the table so it would not interfere with his disability, so I agreed, after all, she was the only one handling the money and I did not have a choice.

It showed me that when she knew that she had me over a barrel, she became ruthless. I told Jennifer that if she told anyone my identity before it was time, then we would all go to jail, because Channel 48 and Margo Gray would destroy the company if they knew I was involved, and if that happened before I had a chance to make it completely successful, then it would look like a scam. I used the analogy that she had a hand grenade and if she told anyone, then it would be like pulling the pin and holding it in her hand, we would both suffer greatly. Later, I discovered that she had told at least her brother my true identity, because he told a few growers (starting in April 2014) that my real name was not Jim Gilley and to look me up online.

Jackie also wanted me to buy her a \$46,000 diamond ring in order to maintain her silence, which I agreed to purchase at Ellis jewelers in Concord, North Carolina. I realized then that Jackie was simply out to get as much as she possibly could, so I agreed to buy the ring and paid Dan Livingston, the owner of Ellis jewelry over \$46,000 (from the new SunTrust account) to keep her quiet for a little longer. I eventually cancelled the ring and had Jennifer pick-up the money and deposit it into the WormzOrganic checking account at 5th3rd bank, which she said she did, but I was unable to verify the deposit, because she had changed the checking account passwords and basically cut me off. I know that Dan Livingston gave her the refund money I just don't know what she did with it.

On June 11, 2014, Jennifer and Jackie called the police and reported some kind of domestic disturbance involving me (knowing I could not and would not do anything) but when the police arrived I left the apartment complex before they could question me. They also reported my company van stolen (knowing I was driving it). The last time I had access to the checking account (May 6, 2014) there was over \$165,000 on deposit, plus the \$46,000 that she picked up from Ellis Jeweler store in June after I cancelled Jackie's diamond ring.

The ring was to be ready June 14, 2014, but the ring never made it; once again the ole Jackie reared her thieving head. I had an agreement with the district attorney in Murfreesboro Tennessee to pay Mark Pflanzler of Banc Services, \$100,000 for a business deal that went bad in 2006. That's another story but I had been making payments to Pflanzler since 2011 and had paid a little over \$35,000 and still owed about \$70,000.

This Tennessee issue had already cost me bad news reports from Margo Gray, and I had not appeared for my January 20, 2014, court date in Murfreesboro because of threats on my life from Shawn Berry (an affiliate at CCOF) who had believed Margo Gray's news story. I also believe it was Shawn Berry who had crashed into my parked Infiniti car, slashed the tires on several company vans, and burned my house on Keel Mountain, but I have no proof. And since I did not show up in Murfreesboro on Jan 20, 2014, a bench warrant had been issued for my arrest. Shawn Berry drove to Murfreesboro to make good on his threats, which he sent an email calling me, "to scared to show up", which I was afraid he would carry out his threat, so I did not go. So one of the first things I was prepared to do was pay Pflanzler and get the Tennessee issue behind me. Even though I am not guilty of any wrongdoings in Tennessee, my attorney, Greg Reed, advised me that because of my federal crimes in the 1980s, that there was always a chance of a conviction (remember, no one believes in 2nd chances) and by paying the \$100,000, the DA would drop all charges and nothing further would ever be said.

(This business deal happened in 2006 and in 2011, Mark Pflanzer had a new political friend and used his friendship to have me arrested. The DA in Murfreesboro refused to indict me (because I am not guilty) so Pflanzer convinced or paid Senator Bill Ketrone of Tennessee, to put pressure on the local district attorney Jade Santana to arrest me. It was Pflanzer's opinion that I must be guilty of something if I had been arrested 26 years ago, regardless of the facts and truth, and so an arrest warrant was issued for me in 2011 for a bad business deal from 2006, for buying autodialers that never worked. In 2006, I lost all of my collateral to Pflanzer, my wife lost her bath and body beauty salon store that she also put up as additional collateral to Pflanzer, and Pflanzer got all of the new equipment plus all of our collateral and the real culprit got away scot free. In 2012, we discovered that the company that sold us the autodialing equipment had been sued three times in Federal court for pirating software and the owner had been convicted on two separate occasions for the same crime, but Pflanzer never ran a background check on that company.)

So I needed to get the \$70,000 balance to Tennessee without exposing my new company (WormzOrganic) and Jackie Wilson agreed to help me by taking \$70,000 in cash and depositing it into her personal USAA account and then wire-transferring the money to my attorney Greg Reed in Murfreesboro, who would pay the debt and all would be over. So I gave Jackie the cash in May and she went home to Huntsville, Alabama to make the deposit and then make the transfer to my attorney. I called Greg Reed in Tennessee and for the next seven or eight days he checked his account for the transfer that never came.

Finally after two weeks of no-shows, Jackie said that she had to fly home and complete some banking forms in order to send that large of an amount, which was never the case, she was only buying time. Let me back up. Around May 1, 2014, Jackie and Neil Lester (who was my warehouse worker at WormzOrganic) became boyfriend and girlfriend and started dating. They were married at the courthouse in Concord on June 15, 2014 after knowing each other a few months. They broke up in November 2014.

Between May 15, 2014 and June 11, 2014, all hell broke loose. I was preparing to pay the \$70,000 to Pflanzer and invest \$100,000 per month back into the CCOF and the Affiliates, which Mitch Howie, my attorney in Huntsville, had been negotiating with Nathan Brock (the attorney in Cullman) to settle the lawsuit in which a \$225,000 judgment had been levied against CCOF and myself. My plan was to settle the lawsuit, get the 200+ CCOF greenhouses back operational and grow some awesome tomatoes for the 2015 season.

The worm castings from 162 growers would be generating profits of \$100,000+ per month that was going to CCOF until it was brought current, but Jackie Wilson had other plans. After two weeks of excuses as to why the \$70,000 had not been sent to Tennessee, she finally agreed to give me a cashier's check and that's what I would forward to Greg Reed in Tennessee. But that also never happened.

There were several new problems at WormzOrganic, because of the relationship between Jackie and Neil Lester, and so I made Jackie fire Neil because of the problems that were being generated and the lack of attention that the company was receiving, which were the results of their inner-office relationship, or so I thought. I explained about office relationships and that only her or Neil could work at the office, so she decided that Neil had to go and so she reluctantly fired him. This caused her to go overboard, which I realized too late and cost me

dearly.

By the end of May 2014 Jackie had fired everyone that I had in place at WormzOrganic (about 12 employees) and had replaced them with all new employees that she could control and were loyal to her. At this point nobody knew my real name except for Jennifer and Jackie and whomever they had secretly told. Jackie knows of my plans to place new owners at WormzOrganic in July 2014, and thereafter, she and I are supposed to go back to Huntsville and start the CCOF rebuilding, but Jackie has found new love in North Carolina and is not wanting to go with me to Huntsville and she and Neil Lester had other plans for WormzOrganic.

So instead of telling me her new plans, she and Neil Lester decided to go a different route. Sabotage WormzOrganic, have me arrested, and start a new worm company (www.thewormwarriors.com) with my 162 worm farmers, which I know of these details because I added her iPhone to my iCloud account and every day her messages were backed up on my Account, which I could download and review without her knowledge. It was a company iPhone so I felt comfortable and needed to know what she was up to.

On June 8, 2014 I read her messages and one of them to Joe Whiton, her new office manager, was talking about the June 14, 2014, walkout of all the employees, and how Jim (me) would soon be taken completely out of power.

At the time I was in Huntsville talking with attorney Mitch Howie about CCOF, so I had to get back to Concord ASAP to prevent Jackie from closing the company down. I arrived in Concord and called Jennifer Langford and convinced her to go back to the office and fire most of Jackie's people and put the Langford's back in charge. Jennifer was the lesser of two evils.

On June 11, 2014 Jackie convinced Jennifer to turn against me. I don't know what Jackie said to Jennifer, but I think she offered Jennifer 50% of her new worm company they were trying to start with my 162 growers. Jennifer came to my corporate apartment, which was in her name, and locked me out of my apartment. I was in flip-flop shoes, a pair of shorts and a t-shirt. They called the police and I refused to wait around because I knew they would arrest me for the Tennessee bench warrant. I called a cab and went to the office where I had a key under the doormat, went into the office and took the company van and credit card and went back to Huntsville.

I had been speaking with Bill and Gregg who were supposed to take over WormzOrganic in July 2014 as the new owners. Part of the deal was for me to announce my true identity soon thereafter and explain to all of the WormzOrganic growers that I had to return to CCOF and fix the company and that WormzOrganic would be a supportive company with the worm-castings. And also a stand-alone company, which would offer for sale private label products, such as worm teabags, worm tea production kits, organic grow bags, and worm tea-making kits. I, Jaime Lawhorne, just could not own anything on paper... remember, nobody *really* believes in 2nd chances! Especially corporations like Raycom Media, who will ruin the lives of 265 farmers just to get a story.

I could not pretend to be Jim Gilley forever, and if everything was running smoothly with most of the early growers making profit already, then no problems should arise. Plus time was of the essence because it had been 10 months since anyone in Huntsville had heard from me.

So I sent out a mass email to all of the growers explaining who I was and when the new management would be taking over, which I had to move up ahead of schedule because of Jackie's sabotaging attempts with Jennifer Langford.

My plan to leave Jackie in place until the Bill and Gregg team could take over had to be moved up to the end of June because of their sabotaging and take over attempts, so I called Jennifer Langford and had her and her father go back to the company, fire Jackie and take back over WormzOrganic before they could cause any major issues and/or have everyone walk out of the company before Gregg arrived, but Jackie and Jennifer teamed up and everyone walked out of WormzOrganic anyway. Jennifer Langford released an email right after I told everyone my real name stating that she had just found out my true identity, which she was only trying to cover her tracks, since she knew of my identity months earlier.

I even called Margo Gray at channel 48 in the hopes that she would not try to destroy our WormzOrganic Company by hearing it from me first. I gave her a brief statement, explained about WormzOrganic and instead of broadcasting on TV right away, mainly because of the liable lawsuit that I had delivered to Raycom in Montgomery suing them for bankrupting CCOF with false statements made by Margo Gray. So Margo contacted some of the CCOF Affiliates and had them contact my WormzOrganic growers through Facebook, which actually almost destroyed the company; but Margo was too late this time, I had already told everyone who I was and the new owner had already taken the reins. Although a handful filed complaints, most of the WormzOrganic farmers looked past my identity issues and today the company is successful and profitable, under a new name and a new owner. Earth-soil.com is the marketing arm and the growers have been gathered and are selling their castings to Southern Vermiculture, which I had preferred to keep under one company, but I trust the direction that new owner Gregg Holloway decided to go.

Jackie had moved out of my place and into her new place and had located an office and warehouse for her new worm farmers business, called "The Worm Warriors", which she incorporated June 5, 2014, in NC, but I quickly released a memo to all the growers outlining her saboteur plot and effectively shut her down before she could get it off the ground. (What comes around goes around)

I called Jackie's father, retired Colonel Dr. Jeffrey Wilson at the Huntsville city school system and asked him to please get his daughter under control and have her to please return the \$70,000 cash and the CCOF corporate POD that she had stolen from the POD company in Huntsville because she knew my POD code. But calling her father was a bad idea and only added fuel to her fire. This obviously made her extremely mad because on July 11, 2014, I drove to the James Adcock law firm outside of Raleigh North Carolina in Piqua for the official handover and signed all the WormzOrganic assets over to Gregg Holloway for \$1.00.

July 11, 2014 was also the day that Jackie had promised to return the \$70,000 that she had taken to pay to the Tennessee attorney Greg Reed. Jackie also told me that her and Neal were breaking up (which was a lie) and that she needed a ride back to Huntsville on July 11, 2014, and so I agreed to give her a lift because she was going to the bank to return my \$70,000, but that is not what happened.

I picked her up at around 6:30PM, and as soon as we crossed over into South Carolina, outside Gaffney South Carolina, Jackie wanted to stop and have a Krystal burger so we pulled in the drive-thru only to be met by seven or eight police vehicles and the local swat-team, because her and husband Neil Lester, had conspired against me and had told the police that I had kidnapped Jackie at gunpoint, which after four hours of strip searching my company van for a weapon (and finding none) and Jackie speaking with three different police officers and giving three different stories to each, Sheriff Mueller refused to arrest me for the kidnapping charge, but because I had an outstanding warrant in Tennessee (because the \$70,000 never was paid) they detained me and extradited me back to Tennessee.

They knew that I did not kidnap Jackie because she had a packed bag (who packs a bag for a kidnapping) and there were text messages from her and me all day long with her asking me, "what time would I be there to pick her up." But this was their opportunity to get me out of the picture, but it was too late for their plot because I had already signed over WormzOrganic to Gregg Holloway earlier that same day, and released an email to all the growers outlining their take-over plot.

The new worm companies (Earth-Soil and Southern Vermiculture) are doing great, the products are in distribution and the company is a success, but if my name were to be associated with the new company Channel 48 news would try their best to sink that company and give no consideration to the farmers who have invested hard earned money and sweat equity into growing for Jaime Lawhorne. Earth-Soil is contracted with the growers, who are united under Southern Vermiculture, to provide Earth-Soil 100,000 pounds of worm-castings every month.

As of present time, instead having \$100,000 per month to re-invest into CCOF, Jackie and Neil Lester and Jennifer Langford's treachery confined me to incarceration from July 11, 2014 until December 22, 2014. And I'm faced with a trial on April 20, 2014, in Murfreesboro, Tennessee, because I failed to get the \$70,000 balance to Pflanzler; and another trial on April 3, 2014, in Huntsville, Alabama, because I failed to help any of the CCOF Affiliates in a timely manner.

I was forced to transfer all of the WormzOrganic assets (for \$1.00) to Gregg Holloway, which amounted to well over \$100,000 in hardware, plus whatever was remaining in the company checking account that Jennifer Langford did not embezzle.

Four enterprising growers formed the new company, Southern Vermiculture, and operate that company for profit. After Jennifer Langford released the memo on July 5, 2014, acting like she JUST found out my true identity, I knew major problems were to follow. I heard she remodeled her house (and maybe her parent's house too) with the WormzOrganic checking account money.

Jennifer, Jackie and Neil could not recover with "The Worm Warriors" after I released the damning memo exposing their plot; so Jennifer retired with WormzOrganic assets and Jackie went to work for Curtis and Colleen Pyle in Concord NC, who own and operate www.JustLetMeDolt.com. After six weeks of working for Colleen, Jackie and Neil started their own version of Colleen's repair service business. Jackie stole their hard-drive and Neil had his mother deposit \$5000 into her dubious massage company, and she started "First Call Commercial Services, LLC". It seems she will not learn until she spends some time in jail. And they said I was a crook; these people make me look like Santa Claus. Neil Lester has been living

off the \$70,000 that Jackie stole from me. Just look at all of the things he and Jackie have purchased over the last six months. Neil paid off all his legal bills, has a brand new 2014 mustang, and I have recordings of him bragging about robbing all the Domino Pizzas within a 20 mile radius (of Concord NC) and robbing some tire store, which were all inside jobs, because he was bragging about having security codes.

Neil Lester spent five years in NC prison for armed robbery and was on parole when he, Jackie and Jennifer plotted their schemes against WormzOrganic and myself. Jennifer Langford embezzled an unknown amount of cash from WormzOrganic and stole at least one company car, a 2012 Mini Cooper, and may (by now) have had it re-titled into her personal name. Jennifer also stole all of the furniture and electronics from my corporate apartment located at 138 Hydrangea Circle at Bexley Village in Concord, NC. I am unsure of what happened to the tools and the air-conditioned travel trailer.

The last few years have been like a surreal lifetime movie and I would hope and pray that you farmers who believed in my vision to continue to believe and please hold your judgments and gunfire until you have all the facts, and please don't judge me based on immature actions and illegal activities that I committed in the 1980s. I definitely committed crimes in the 1980s and was arrested and pled guilty, and my family and I spent 9 years 10 months and 11 days of our lives paying for it. I repented my sins and have committed no crimes since the 1980s and I can prove it; like Margo said to a room full of CCOF Affiliates, "guilty until proven innocent", although she corrected herself with, "innocent until proven guilty", it showed her true self with no way to edit those words out. Everyone laughed (including me) when she said it, but it isn't funny and it shows how people jump to conclusions, and in this case, it cost all of us our time, money and we lost a great business.

There are 265 CCOF angry farmers and 162 WormzOrganic farmers that have complaints, so in the authority's eyes a crime must have been committed, why else are these complaints being generated; simple, because an unscrupulous reporter named Margo Gray, trying to make a name for herself and not caring who she hurt in the process, recklessly and deliberately lied (knowingly or unknowingly) to a room full of CCOF growers, which most of you believed, and caused all of us to lose our investments. And the WormzOrganic Growers were torpedoed by greed from those I trusted the most.

I hereby affirm that all of the above is true and correct.

Jaime Lawhorne

See Affidavits of Support below...

May 6, 2014 was the last time I had access to the WormzOrganic Corporate checking accounts, which can be verified by login records. Jennifer Langford locked me out of the online banking portal when I inquired about the large cash withdrawals. There were several \$9500 withdrawals that she claimed was used to purchase materials and such, but when I asked for the receipts, she delayed me with excuses. I did receive some funds for living expenses, which I submitted a signed invoice to the office when I received money. Jennifer also received the \$46,000 (diamond ring) refund, which was supposed to go into one of these account. She personally picked-up the \$46,000+ from Dan Livingston at Ellis Jewelry Store in downtown Concord the middle of June 2014. The account ending in 8044 was the general operating account; the account ending in 8895 was supposed to be used to pay the Contracted Growers for worm-castings and worm production, and the account ending in 8952 was to be used as a travel account for future drivers/delivery personnel.

WORMZORGANIC LLC
 Tuesday, May 6, 2014
 Last Login: 05/06/2014 04:01 PM ET

0 new messages
[View messages](#)

Deposits/Investments

Account Name	Account Type	Balance as of 05/05/14	Available Balance
5/3 BUSINESS STANDARD CHECKING X8044	Checking	\$165,401.37	\$51,010.21
5/3 BUSINESS STANDARD CHECKING X8895	Checking	\$100.00	\$110,100.00
5/3 BUSINESS STANDARD CHECKING X8952	Checking	\$100.00	\$100.00

Credit Cards/Loans

Account Name	Account Type	Balance
No Credit Card/Loan accounts found.		

Scheduled Internal Transfers

Transfer Date	Amount	From Account	To Account
No Pending Transfers			

**UNITED STATES DISTRICT COURT
FOR THE NOTHERN DISTRICT OF ALABAMA**

CYPRESS CREEK ORGANIC FARMS, INC.)	
JAMES LAWHORNE)	
266 AFFILIATE FARMERS)	
)	
Plaintiffs,)	
)	
VS.)	Civil Action No. _____
)	
WAFF CHANNEL 48)	
RAYCOM MEDIA, INC)	
MR. PAUL MCTEAR)	
MR. JOHN HAYES)	
)	
Defendants,)	

Plaintiffs James Lawhorne, Cypress Creek Organic Farms, Inc. (CCOF) and 266 Affiliate Farmers (collectively, "Plaintiffs"), by and for their complaints against Defendants are as follows:

NATURE OF THE CASE

1. On August 28, 2013, Margo Gray called CCOF corporate offices and wanted an interview within the hour with CEO James Lawhorne. He was not at the office but Margo and her crew barged into the reception area and begin harassing

CCOF staff and demanding an interview. Margo and her crew stayed in the reception area for over 20 minutes harassing CCOF employees.

2. WAFF aired an incriminating smear article on Aug 28. Four of the 266 Affiliate Farmers dropped out of the Affiliate program and seven cancelled their Affiliates closings, costing CCOF over \$100,000 the first day. In an attempt to set the record straight, an interview with WAFF 48 was scheduled the following Tuesday, Sept 4, 2013. 50 Affiliate Farmers were invited to the interview and about 60 showed up. The room was packed.
3. During the two hour interview, Margo made several claims, one of which caused 47 Affiliates (of the 266 Affiliates) to demand a refund, which effectively bankrupted CCOF. Margo claimed that CCOF could not get the greenhouses certified USDA organic, because she claimed that since we did not have anyone certified yet, that it was impossible to get them certified. She kept confusing Affiliates with comments like; "these are not greenhouses, these are hoop houses", and hoop houses cannot be certified organic... her comments caused devastation.
4. When the interview took place, zero of the 266 Affiliates had received their certification from the USDA organics division. But two weeks after the interview, the first five Affiliates received their USDA Organic Certification. These first five Affiliates signed up in Feb 2013 and had just received their certification, because

it takes the USDA months to get this done, but Margo kept telling everyone that they could not get certification, and because no one had received certification yet, and Margo portrayed CCOF as a criminal enterprise and a fraud, because of the CEO's past, everyone believed her.

5. Margo said several untruthful comments causing the company to collapse and therefore bankrupting the CCOF.
6. Everyone that demanded their money back said it was because the CEO had lied and could not get their greenhouses certified USDA organic. No one would believe CCOF after Margo ran the story over and over and over and over until it seemed that CCOF was a heartless criminal enterprise that would steal everyone's money. After \$470,000 in refunds were issued, CCOF was bankrupt and had to close its doors.
7. WAFF claims that Affiliate Farmers could **not** earn \$25000 per year as claimed by CCOF, but instead only about \$17000 could be earned. Even though CCOF grows three crops per year, WAFF used only two crops to determine \$17000 per year; effectively misleading everyone listening.
8. Based on WAFF's numbers of \$17000 per year. 266 Affiliate Farmers have a loss income of \$22,525,000 from the five year contract that is no longer any good because of WAFF. There were also 185 new Affiliate Farmers that never had the

chance to execute their contract with CCOF causing another \$15,725,000 is loss income. True losses are conservatively 30% higher.

9. In order to settle this case, the owner's of WAFF must pay \$12,950 for each Affiliate that invested into the CCOF Affiliate Program. In this way all 266 Affiliates may receive their money back.

10. WAFF blatant disregards for the truth and to further enhance and sell their "WAFF Investigates" news program has caused great harm to 266 pissed off farmers in Tennessee, Alabama and Georgia. In addition, CCOF is now bankrupt.

11. CCOF will sue for \$86,500,000.00 if Raycom decides not to accept the settlement offer.

SETTLEMENT

WAFF agrees to fire Margo Gray for her reckless news coverage and WAFF must pay \$3,444,700.00, which is \$12,950.00 per 266 Affiliate Farmers. This payment must be received into the Law Offices of Mitch Howie in Huntsville Alabama on or before the close of business December 4, 2013.

Respectfully,

JAMES LAWHORNE
CEO