

IN THE CIRCUIT COURT OF THE
15TH JUDICIAL CIRCUIT, IN AND FOR
PALM BEACH COUNTY, FLORIDA

GABE HOFFMAN, an individual,

Plaintiff,

v.

CASE NO.: 50-2019-CA-013860-XXXX-MB

THOMAS SCHOENBERGER, an individual,

Defendant.

DEFENDANT'S EMERGENCY MOTION FOR INJUNCTIVE RELIEF
FOR SUPPRESSION GAG ORDER

Pursuant to Florida Rule of Civil Procedure 1.610 and other applicable law, Defendant, Thomas Schoenberger, (hereinafter "SCHOENBERGER"), hereby moves on the following grounds for an order of this Court, temporarily and permanently enjoining Plaintiff GABE HOFFMAN (hereinafter "HOFFMAN") from taking certain actions more fully described below (the "Actionable Misconduct") based on facts and circumstances herein presented, including, but not limited to, the August 13, 2020 hearing.

Defendant motions this court, preventing the attorney Dennis Klein, and Plaintiff HOFFMAN from making statements outside of court about the case. Relief is sought preventing the parties from talking about the facts of the case, the various theories, including, but not limited to, the legal issues and other matters that might effect the fair adjudication of this case. Defendant hereby provides evidence Plaintiff has weaponized these court proceedings to bring harm to Defendant SCHOENBERGER, and/or reduce Defendant's ability to fair litigation and/or trial.

GROUND FOR EMERGENCY MOTION FOR INJUNCTIVE RELIEF
FOR SUPPRESSION GAG ORDER

Prior to this Court's hearing August 13, 2020, Plaintiff HOFFMAN began marketing publically to his associates, known internet gang-stalkers, the hearing zoom meeting login details, publically on social media and on monetized video channels. This resulted in the court hearing's zoom hearing being recorded and weaponized against Defendant SCHOENBERGER within hours of the hearing, with aggravated cyberassaults and/or cyber gangstalking. These aggravated cyber stalking and attacks have continued without abatement.

Wherefore, Defendant respectfully moves this court to grant a SUPPRESSION GAG ORDER that immediate and irreparable injury, loss, or damage will result to the movant before this case can be fairly heard before this court; and

Defendant sets forth the following actionable misconduct, which violates Florida Statutes and Constitution: "A person who willfully, maliciously, and repeatedly follows, harasses, or cyberstalks another person and makes a credible threat to that person commits the offense of aggravated stalking, a felony of the third degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084."

ACTIONABLE MISCONDUCT

Defendant sets forth the injury, and why the injury may be irreparable, as follows:

HOFFMAN was unknown to SCHOENBERGER until HOFFMAN began an malicious online libel, slander, and defamation campaign against SCHOENBERGER on or about May 27, 2019. See attached Exhibit 1.

The attacks from stranger HOFFMAN began without contacting SCHOENBERGER to confirm nor deny whatever questions HOFFMAN may or may not have had, and have continued to this day. Including false accusations against SCHOENBERGER, attempting to libel, slander, defame, bully, including but not limited to attacking SCHOENBERGER on social media accounts and monetized youtube channels. Including, on or about May 29, 2019 HOFFMAN attacked SCHOENBERGER from HOFFMAN'S twitter account @AnOpenSecret but referenced a twitter account @Regan56417405 unknown to SCHOENBERGER, as if it were SCHOENBERGER on or about May 29, 2019. See attached Exhibit 2.

HOFFMAN has a history of malicious libel, slander, and defamation against persons online and frivolously embarking in legal action against them when said persons attempt to defend themselves. This court has two (2) other libel/slander cases pending with HOFFMAN as Plaintiff. (1) Hoffman v. Alexander Case No. 50-2019-CA-013281-XXXX-MB. (2) Hoffman v. Jacquez Case No. 50-2019-CA-016488-XXXX-MB. See attached Exhibit 3.

HOFFMAN has attempted to enjoin a Florida resident into this case, Ashley Reagan Early aka Reagan Early McGregor (hereinafter "REAGAN") despite SCHOENBERGER never knowing REAGAN'S known name, nor that she lived in Florida, until HOFFMAN doxed her in this lawsuit. Including publicly disclosing her address for other gangstalkers, in an attempt to obtain jurisdiction against SCHOENBERGER, who has never lived in the State of Florida. REAGAN is an online person known to SCHOENBERGER only through social media. REAGAN has simply defended SCHOENBERGER on occasion of HOFFMAN'S aggravated cyber attacks. This is not only an attempt to force the court to entertain a case which it does not have jurisdiction, but the frivolous attempts HOFFMAN is willing to go to, to continue harassing SCHOENBERGER, including harassing REAGAN by involving an innocent single mother with children. See attached Exhibit 4.

HOFFMAN had SCHOENBERGER service of the Complaint 'filmed' in this case, then weaponized it on monetized social media accounts and channels of HOFFMAN associates, not only to humiliate SCHOENBERGER but to also dox his location to other gangstalkers publicly associated with HOFFMAN. HOFFMAN continues this malicious misconduct when he promoted the zoom hearing in this case August 13, 2020 to HOFFMAN'S gangstalkers. Gangstalkers accessed the hearing, recorded the proceedings, and then weaponized it on their monetized youtube channels. See attached Exhibit 5 and 6.

The intent in doxing is for the target to experience some repercussions, from public shame or ostracization to being fired from employment. HOFFMAN'S doxing was done with the intent to threaten, harass, publically shame, ostracize, including but not limited to reputation destruction, which led to threats, harassment, aggravated cyber attacks and a bounty put on SCHOENBERGER by an well known associate of HOFFMAN, Manuel Chavez aka Defango aka larpwars aka illusiveman (herinafter "DEFANGO") on or about July 31, 2019. See attached Exhibit 7.

HOFFMAN appears on DEFANGO'S monetized youtube channel regularly. HOFFMAN has been nefarious in his actions towards SCHOENBERGER since the inception of HOFFMAN'S attacks upon SCHOENBERGER began. If HOFFMAN were a credible

public persona, why is he initiating cyber bullying people online to begin with? HOFFMAN has used DEFANGO and others to taunt and gaslight SCHOENBERGER into responding. Such was the case on or about November 5, 2019 when DEFANGO emailed SCHOENBERGER taunting to come on DEFANGO'S monetized youtube channel. See attached Exhibit 8. Evidence of the said youtube stream between HOFFMAN and DEFANGO November 5, 2019 attached as Exhibit 9.

The above actionable misconduct may or may not be the totality, SCHOENBERGER reserves all rights regarding additional evidence of HOFFMAN misconduct, unknown to SCHOENBERGER at the time of this filing. Harassing another person using an electronic form of communication is a crime in Florida. Florida law also prohibits bullying (including cyberbullying via electronic means). Unlike most states, Florida explicitly defines "cyberbullying." "Bullying through the use of technology or any electronic communication." (Fla. Stat. Ann. §1006.147.) The statute includes email, internet communications, instant messages, faxes, websites, and blogs in its descriptive and non-exclusive list of electronic means of bullying. (Fla. Stat. Ann. §1006.147.) Florida stalking law covers "cyberstalking" as well. (Fla. Stat. Ann. § 784.048.) A person is guilty of a misdemeanor crime if he or she willfully, maliciously, and repeatedly harasses or cyberstalks another person. (Fla. Stat. Ann. § 784.048.) Cyberbullying is a felony crime if the person engaging in it also makes a credible threat to the victim. "Harassing" conduct as a course of conduct serving no legitimate purpose that is directed at a specific person, causing that person substantial emotional distress. (Fla. Stat. Ann. § 784.048.)

HOFFMAN has made "credible threats" which places SCHOENBERGER targeted by the threat, and SCHOENBERGER is in reasonable fear for his safety, the safety of his then minor son, who has also been stalked and doxed by HOFFMAN associates. (Fla. Stat. Ann. § 784.048.) SCHOENBERGER'S fear of a threat is reasonable since HOFFMAN has the ability and intent to carry out these threats through this aggravated misconduct already exhibited in the evidence put forth herein and in HOFFMAN'S own filings. (Fla. Stat. Ann. § 784.048.)

RELIEF

Defendant SCHOENBERGER moves for an emergency injunction SUPPRESSION GAG ORDER and requests the same shall remain in effect until the further order of the court. Defendant requests said SUPPRESSION GAG ORDER shall be binding on the parties to the action, their officers, agents, servants, associates, employees, and attorneys and on those persons in active concert or participation with them who receive notice of the injunction SUPPRESSION GAG ORDER.

DATED this 20th day of August 2020.

/s/ Thomas Schoenberger

THOMAS SCHOENBERGER, pro se
1726 Willowbrook Drive, Provo, UT 84604
tsger13@gmail.com

CERTIFICATION OF SERVICE

I HEREBY CERTIFY that on the 20th day of August, 2020 this document was filed using the Florida Courts E-filing Portal. This document is being served on counsel of record by the Florida Courts E-filing Portal, pursuant to and in compliance with Fla. R. Jud. Admin. 2.516. The mailing and electronic addresses are: Attorney for Plaintiff Dennis S. Klein at dklein@kelleykronenberg.com; 10360 West State Road 84, Fort Lauderdale, FL 33324.

By: /s/ Thomas Schoenberger

THOMAS SCHOENBERGER, pro se

EXHIBIT 1



An Open Secret @AnOpenSecret · May 27

Replying to @AnOpenSecret

To be clear:

The physical, documented evidence is overwhelming, that Isaac Kappy, and Isaac Kappy alone, committed suicide

Researchers should focus on Thomas Schoenberger

& his relationship w/ IK

To understand IK life, actions, and state of mind - from July 2018 to May 2019



4



24



41




EXHIBIT 2



An Open Secret @AnOpenSecret · May 29

Harassment like "Jew boy", and worse. Many times each day.

We are clearly on target exposing Thomas Schoenberger of Cicada 3301 as Isaac Kappy's handler - and he is VERY angry!




Rachel Retweeted

Rachel @Rachel56417405 · 8m

Replied to @AnOpenSecret

He's protecting someone. He blocks instead of coming back with a decent argument. It's sad really because I mean you can't cling to a half assed documentary forever. If he is a pedo I would not be surprised.

1




Rachel Retweeted

Rachel @Rachel56417405 · 7m

Replied to @GabeHoff @colosuss_crisis and ...

How did it go reporting Titus to his boss jewboy?

1



Rachel

@Rachel56417405

fun

Joined May 2019

0 Following 0 Followers

Not followed by anyone you're following

Tweets

Tweets & replies

Me

3

18

33

7

EXHIBIT 3

Search Criteria

Last Name / Company Name: Hoffman
First Name: Gabe
Court Type: All - Court Types
Case Type: All - Case Types
Name Search Type: Exact Name Search
One Row Per Case: True

Any case that is highlighted yellow within the search results has an open warrant

Search Results

3 records returned. Click on a column name to sort the results by that column's data.

Page Size: 25 ▼

Case Number	Court Type	Case Type	Arrest Date	File Date	Case Style	Status
50-2019-CA-016488-XXXX-MB	Circuit Civil	LIBEL/SLANDER		12/27/2019	HOFFMAN, GABE V JACQUEZ, JULIO CESAREO	Open
50-2019-CA-013860-XXXX-MB	Circuit Civil	LIBEL/SLANDER		10/28/2019	HOFFMAN, GABE V SCHOENBERGER, THOMAS	Open
50-2019-CA-013281-XXXX-MB	Circuit Civil	LIBEL/SLANDER		10/14/2019	HOFFMAN, GABE V ALEXANDER, ALI	Open

EXHIBIT 4

VERIFIED RETURN OF SERVICE

Case: 50-2019-CA- 013860-XXXX- MB	Court: IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT, IN AND FOR PALM BEACH COUNTY, FLORIDA	County: PALM BEACH	Job: 4756306 (7367)
Plaintiff: GABE HOFFMAN		Defendant: THOMAS SCHOENBERGER	
Received by: Burke Process Service Inc		For: Kelley Kronenberg, P A	
To be served upon: ASHLEY REAGAN EARLY a/k/a Reagan Early McGregor: 403 W DEVANE STREET, PLANT CITY, FL 33563			

I, Sylvia F Dial, am over the age of 18 years and not a party to this action. Pursuant to Florida Statute 92.525 under penalties of perjury, I declare that I have read the foregoing Verified Return Of Service, and that the facts stated in it are true and correct. I was authorized by law to make service of the documents or post the contents herein.

Date & Time Received: Aug 5, 2020 at 5:29pm EDT

Person Served (Relationship/Title): ASHLEY REAGAN EARLY a/k/a Reagan Early McGregor

Date & Time of Service: Aug 5, 2020, 6:49 pm EDT

Manner of Service: PERSONAL/INDIVIDUAL

By delivery to the within named person a true copy of this process, with the date and hour of service endorsed by me and informing such person of their contents in compliance with Florida Statute 48.031(1)(a).

Documents: SUBPOENA DUCES TECUM WITHOUT DEPOSITION (MAIL IN RECORDS ONLY)

Additional Comments:

Description: ASHLEY REAGAN EARLY a/k/a Reagan Early McGregor: W/F, 35yrs, 5'8", Slim build, Blonde hair, Blue eyes.

Sylvia F Dial

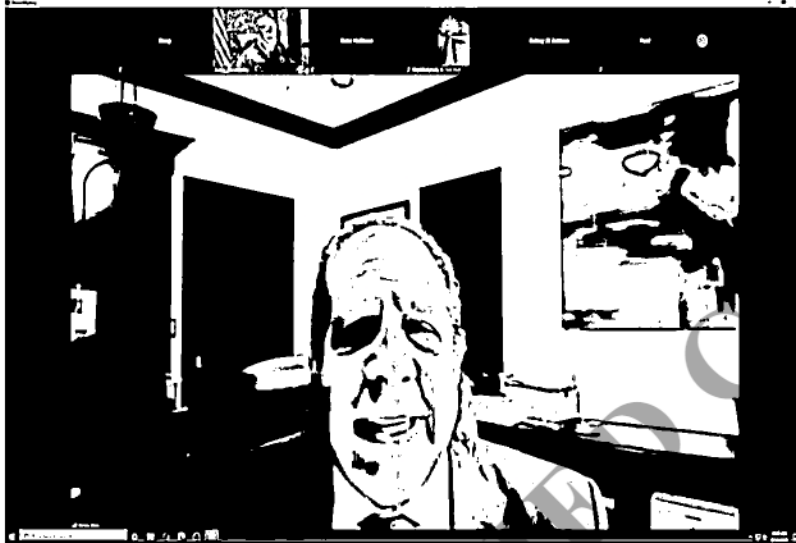
08/06/2020

Sylvia F Dial
CPS #02537453

Date

Burke Process Service Inc
1199 W Newport Center Dr
Deerfield Beach, FL 33442

EXHIBIT 5



Kirks 71 • 31 minutes ago (edited)

Did he just say fat shaming?? Lol we only saw the lardy ass when he was served 😂😂😂 no wonder he uses a photo from 40 years ago as a profile piche looks like a dirty old man with holes in his shirt to boot 😂😂😂 not a good look for a "composer" 😂😂😂



Kirks 71 • 36 minutes ago

Oh no he didntplay the christian card 😂😂😂



EXHIBIT 6



(Douglas Stewart) • 8 minutes ago

OG Wan Kenobi crazy part is when I was rendering it this morning, the finished video was 300gb! No idea why. I had to reduce to 720p, which sucks because I recorded in 1440p just so I could compress it down to 1080 and make it sharper. Oh well, it works lol

1



OG Wan Kenobi • 1 minute ago

@Douglas Stewart yeah ive had that happen too. Dont download in 4k whatever ya do lol. Ive sent this to a few people as the audio is great. A few wanted to see it. Thanks again Doug. Gonna stream the one next week and I will have good audio this time hopefully. Catch ya later 🙌

1



EXHIBIT 7

← Tweet



LARPWARS

@larpwars



1 btc reward for location and
capture of thomas schoenberger
[twitter.com/Solus777/statu...](https://twitter.com/Solus777/status...)

This quoted Tweet is unavailable.

10:08 PM · 31 Jul 19 · Twitter for Android

EXHIBIT 8

From: il1usiveman <defango@gmail.com>
Date: Tue, Nov 5, 2019 at 8:07 PM
Subject: Gabe hoffman has a message
To: Th Stg <tstger13@gmail.com>

Are you going to answer?

Live show in like 10 minutes?

if your man enough

EXHIBIT 9

<https://www.youtube.com/watch?v=Q8dsiOqzZYU>

YouTube FR Search

Top



Thomas Schoenberger vs Gabe Hoffman's Gentleman's Challenge vs Isaac Kappy Showdown il1usiveman

1,362 views • Streamed live on Nov 5, 2019

69 22 SHARE SAVE ...

 **il1usiveman**
20.4K subscribers



It's time for the Showdown with Thomas Schoenberger, Gabe Hoffman wants to talk about his recent dealings with him and has a clear message to give him on the whole Isaac Kappy situation and more. Will Thjomas show up and accept the challenge to speak with Gabe Hoffman or will he once again be a ghost and take to twitter and other social media to continue his attacks? Who knows?

Donation link: <https://il1usiveman.com/>
Contact: il1usiveman@protonmail.com
Twitter @il1usiveman
PATREON: Patreon.com/il1usiveman

Category Comedy