

# SUMMONS (CITACION JUDICIAL)

## NOTICE TO DEFENDANT: (AVISO AL DEMANDADO):

MARIO LOPEZ; DOES 1 to 50, inclusive

## YOU ARE BEING SUED BY PLAINTIFF: (LO ESTÁ DEMANDANDO EL DEMANDANTE):

DESIREE GUERRIERE TOWNSEND

FOR COURT USE ONLY  
(SOLO PARA USO DE LA CORTE)

**FILED**  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF LOS ANGELES

**JUN 13 2025**

David W. Slayton, Executive Officer / Clerk Of Court  
BY: E. MADRID, DEPUTY

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center ([www.courtinfo.ca.gov/selfhelp](http://www.courtinfo.ca.gov/selfhelp)), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site ([www.lawhelpcalifornia.org](http://www.lawhelpcalifornia.org)), the California Courts Online Self-Help Center ([www.courtinfo.ca.gov/selfhelp](http://www.courtinfo.ca.gov/selfhelp)), or by contacting your local court or county bar association. **NOTE:** The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. **¡AVISO!** Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California ([www.sucorte.ca.gov](http://www.sucorte.ca.gov)), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, ([www.lawhelpcalifornia.org](http://www.lawhelpcalifornia.org)), en el Centro de Ayuda de las Cortes de California, ([www.sucorte.ca.gov](http://www.sucorte.ca.gov)) o poniéndose en contacto con la corte o el colegio de abogados locales. **AVISO:** Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is:

(El nombre y dirección de la corte es): Glendale Courthouse

600 East Broadway, Glendale, CA 91206

CASE NUMBER:  
(Número del Caso):

**25 NNCV04089**

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:

(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):

Desiree Guerriere Townsend (PRO SE), 2901 Ocean Park Blvd, Santa Monica, CA 90405, (323) 844-1338

DATE:

(Fecha)

David W. Slayton  
Clerk, by  
(Secretario)

E. MADRID, Deputy  
(Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)

(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).

[SEAL]



### NOTICE TO THE PERSON SERVED: You are served

- ☐ as an individual defendant.
- ☐ as the person sued under the fictitious name of (specify):
- ☐ on behalf of (specify):  
under: ☐ CCP 416.10 (corporation) ☐ CCP 416.60 (minor)  
☐ CCP 416.20 (defunct corporation) ☐ CCP 416.70 (conservatee)  
☐ CCP 416.40 (association or partnership) ☐ CCP 416.90 (authorized person)  
☐ other (specify):
- ☐ by personal delivery on (date):

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES - UNLIMITED**

**FILED**  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF LOS ANGELES

**JUN 13 2025**

David W. Slayton, Executive Officer / Clerk Of Court  
BY: E. MADRID, DEPUTY

DESIRÉE GUERRIÈRE TOWNSEND, an  
individual,

Plaintiff,

v.

MARIO LOPEZ, an individual; and DOES  
1-50, inclusive,

Defendants.

Case No.: **25 NNCV 04089**

**COMPLAINT FOR:**

- (1) DEFAMATION**
- (2) FALSE LIGHT INVASION OF PRIVACY**
- (3) INTENTIONAL INFLICTION OF  
EMOTIONAL DISTRESS**

**DEMAND FOR JURY TRIAL**

Plaintiff Desirée Guerrière Townsend (“Townsend” or “Plaintiff”) complains of  
Defendant Mario Lopez (“Lopez”) and Does 1 through 50, inclusive (collectively,  
“Defendants”), and alleges as follows:

**NATURE OF THE ACTION**

**“Apparently I’m the bearer of fake news? What’s @AccessHollywood got to say about it?”**

- Mario Lopez, Instagram post, @mariolopez, March 13, 2024

1. Defendant Mario Lopez (“Lopez” or “Defendant”) has long cultivated a polished public image that belies a darker reputation, one marked by persistent allegations of arrogance, abusive behavior, and multiple accounts of sexual misconduct. For years, Lopez has used his celebrity status to silence critics, bully those beneath his perceived social rank, and deflect serious accusations with charm and media protection. This lawsuit seeks to hold Lopez accountable for weaponizing his platform to defame and humiliate Plaintiff in retaliation for her refusal to stay

silent. Rather than respond to criticism or controversy with integrity, Lopez chose to smear Plaintiff publicly, furthering a pattern of reckless and harmful conduct that has recently come to light through numerous accounts shared across social media platforms, including TikTok. His conduct reflects not only a disregard for truth, but a broader pattern of cruelty, elitism, and exploitation that the public is only now beginning to uncover.

2. This is a civil action for defamation arising from a false, malicious, and reputation-destroying statement made by Defendant Mario Lopez on or about June 19, 2024. The defamatory statement concerning the Plaintiff was published on Lopez's official Instagram account, where it was visible to his audience of over 3 million followers on social media. As a nationally recognized media personality, Lopez's platform carries significant influence and credibility, which made his knowingly false statement especially damaging to Plaintiff's personal and professional reputation. The publication not only spread a harmful falsehood but was done with reckless disregard for the truth, triggering a cascade of reputational harm, emotional distress, and online harassment against Plaintiff that continues to this day.

3. Upon information and belief, in the days that followed, Defendant orchestrated what appeared to be a swift, calculated, and almost formulaic public relations smear campaign, executed with the precision of a playbook response, aimed at discrediting and further humiliating the Plaintiff in direct retaliation for her public confrontation and stated intent to pursue legal action. The speed, coordination, and tone of the campaign evoke tactics more commonly associated with powerful figures seeking to suppress accountability, drawing uncomfortable parallels to the reputation management strategies once used by Harvey Weinstein, rather than those expected of a wholesome actor and television personality.

4. The speed and precision of the smear campaign launched against Plaintiff is particularly troubling in light of a recent surge of viral TikTok videos concerning Defendant Mario



Lopez, many of which have garnered hundreds of thousands of views. These videos are accompanied by a consistent pattern of user comments alleging troubling behavior, including claims of sexual misconduct, mistreatment of fans, entitlement, and inappropriate demands for free goods and services from small businesses. While Plaintiff makes no assertion as to the truth of these claims, the volume and consistency of these accounts raise legitimate questions as to whether similar reputation management tactics may have been used in other instances to suppress or discredit those who have come forward with criticism or allegations against the Defendant.

Today 11:11 AM

Mario Lopez is a serial rapist whose tracks have been covered for years. I know someone who was personally victimized in California. She was a reporter. She was paid to be quiet and never to discuss it. Her ex-husband told me. He is a serial predator with money trails to track. I've been waiting 20 years to divulge this information to someone else who knows his true character. Stay safe girl, never backdown!

**A** Andas  
a nonprofit group in my town unfortunately invited this horse's \_\_\_\_ to headline their community event. the entire time he was here, he was inhumanely rude barely speaking to his sponsors because he could not be bothered. he is a dark individual. 👍

**G** Gracie Borja • Desirée Townsend  
FACTS. He was a regular at Frida in Glendale and expected free things. One time I charged them for the items they wanted for free. His sister started calling me names in Spanish to my manager, which led to a free bill and a zero dollar tip... it's his whole family!!!!

**Sugarinmytea86**  
Our family friend knew him and invited my family to meet him over lunch. He was awful and belittled my home town to no end. I was so sad, bc I loved SBTB! Get him!

**Low commented:** Remember when he freaked out on the upper west side because his Chinese takeout wasn't ready and he screamed. Do you know who I am? 🤔🤔🤔🤔 Just now

**TheMobettag**  
My brother and his friends saved a female friend from being raped by Mario Lopez when he was 16. This was in Chula Vista, an area of San Diego County. That was a bad night. I later lived in Glendale, CA. I don't think I look like my brother but I was in the Whole Foods one evening and there he was staring hard at me. I felt sorry for his young blonde female assistant.  
2d Reply 68

**Barbie RositaPink** 🇺🇸  
I've heard this story before! I know some people who know about this too!  
21m Reply

**Tenacious C**  
Came here to see if anyone commented this! I remember when he wrestled against our school and everyone was mad he was there because of his date rape history.

**The cats Pajamas.**  
People are so delusional about this good guy imagine that M. Lopez portrays. When in fact he is a marital cheater and a rapist. Sadly the victims are required to have more than enough evidence to prosecute. Which is really victimizing women twice in these type of cases. He is a real P. OS.

**XAVIER**  
HE HAS A "PARKING SPOT" HE PREFERS AND WILL BE RUDE AF TO THE STAFF AND ATTENDANTS IF HIS PRISSY LITTLE SPOT ISNT OPEN. Marios a 2 way bitch who gets passed at Diddy Partys.

**latinbutterfly**  
He did a promotional appearance at a club I went to in Houston, he refused to take pictures and didn't want anyone to talk to him. Also he lies about his height he's like 5'3.

5. Defendant Mario Lopez is no stranger to public controversy, having faced multiple serious allegations of sexual misconduct, including rape accusations dating back to the 1990s. Fully aware of the harm public accusations can cause, Lopez nevertheless chose to weaponize his platform to spread a false and defamatory narrative about Plaintiff. Despite being the subject of multiple serious allegations himself, Defendant Lopez knowingly and recklessly published a defamatory statement falsely implying that Plaintiff was fabricating or performing her illness for attention followed by a coordinated and malicious smear campaign that extended across multiple social media platforms. Lopez, whose public image has survived largely due to the **restraint of a public unwilling to condemn him without criminal charges**, opted not to afford Plaintiff the same benefit of the doubt. Instead, he exploited his substantial platform to amplify public ridicule and undermine her credibility, in a move that reflects not only gross hypocrisy, but also a calculated disregard for truth, fairness, and the reputational harm such accusations can cause.

### **PARTIES**

6. Plaintiff Desiree Guerriere Townsend (“Plaintiff”) is a litigation and intellectual property paralegal residing in Los Angeles, California.

7. Defendant Mario Lopez (“Defendant”) is an actor and television host who resides in and conducts substantial professional activities within Los Angeles, California.

8. At this time, Plaintiff does not know the true names or capacities of the individuals and entities identified as Does 1 through 50 and therefore brings claims against them under fictitious names. Plaintiff will amend this Complaint to state their proper identities and roles once that information becomes available. Plaintiff is informed and believes, and on that basis alleges, that each of the Doe defendants was directly or indirectly involved in the publication, distribution, or amplification of the defamatory content described herein. Plaintiff further alleges that each of these unknown defendants contributed to, enabled, or otherwise participated in the wrongful

conduct that forms the basis of this action. The term “Defendants” as used throughout this Complaint refers collectively to Mario Lopez and Does 1 through 50, inclusive.

### **JURISDICTION AND VENUE**

9. Jurisdiction is proper, and venue lies in the Superior Court of the State of California, County of Los Angeles, pursuant to Code of Civil Procedure §§ 395 and 395.5, because Defendant Mario Lopez resides and conducts substantial professional activities within Los Angeles County, and because the wrongful acts and omissions alleged herein occurred, in whole or in part, within this County. Venue is further proper as to Defendants sued herein as Does 1 through 50, inclusive, as their identities and connection to the conduct alleged are currently unknown but believed to be similarly based in or connected to Los Angeles County.

10. This Court has personal jurisdiction over Defendant Mario Lopez because he resides in La Cañada Flintridge, California, and regularly conducts business within the County of Los Angeles, including in North Hollywood.

### **FACTUAL ALLEGATIONS**

#### **A. THE DEFAMATORY INSTAGRAM POST ON JUNETEENTH**

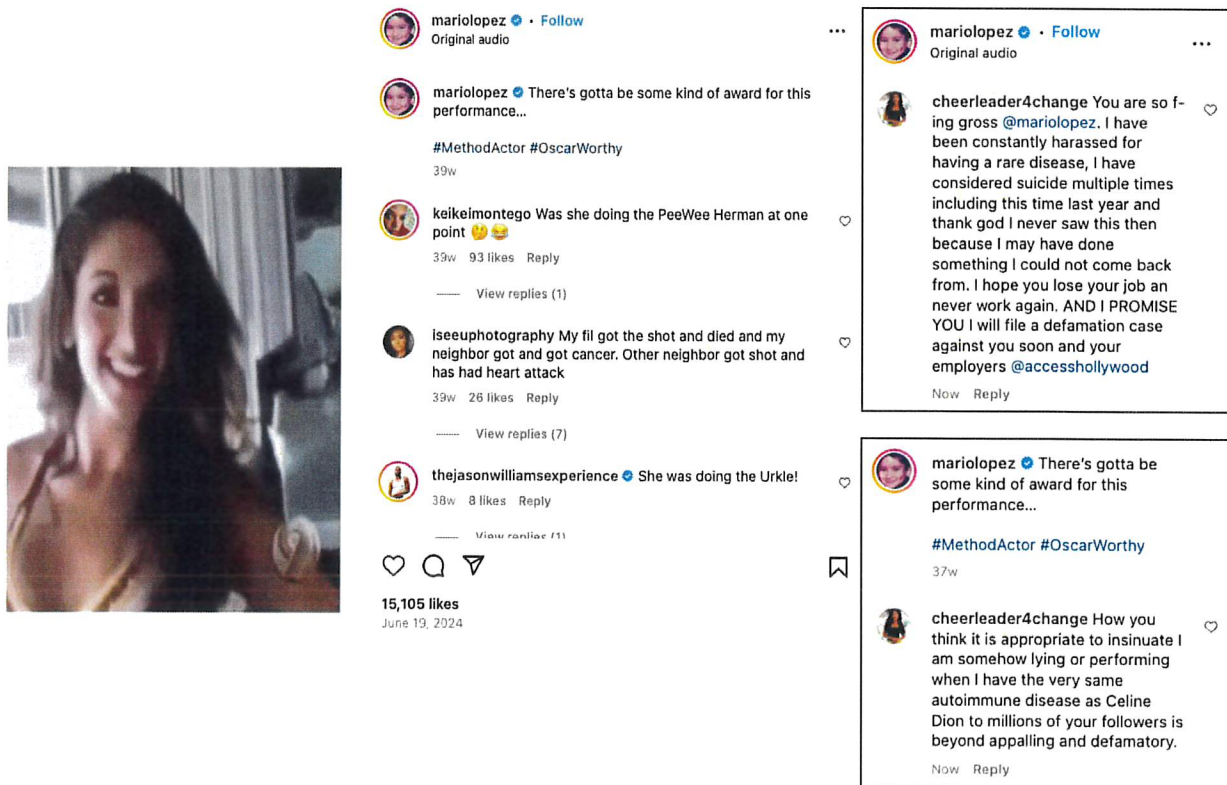
**“It’s all about the 5 Fs: Family, faith, food, fitness and fun, that’s sort of, not to be corny, but my brand if you will.”**

- Mario Lopez, interview on *The Candace Owens Show*, YouTube, June 23, 2019. <https://www.youtube.com/watch?v=FSDlx23uiDY>

11. On or about June 19, 2024, Juneteenth, a national holiday commemorating the end of slavery and honoring the recognition of Black suffering, resilience, and liberation, Defendant Mario Lopez used his public platform not to uplift, but to defame and dehumanize Plaintiff, a woman living with a rare neurological disability. Instead of honoring a day rooted in justice,

dignity, and the fight against systemic oppression, Lopez chose to weaponize his celebrity to perpetuate stigma, mock disability, and ignite public ridicule. His conduct on a day meant for healing and solidarity was not just ironic, it was grotesque. It reflects a troubling and increasingly apparent pattern of disregard for empathy, integrity, and social awareness.

12. On or about March 10, 2025, Plaintiff discovered that Defendant Lopez had published a false and defamatory statement about her on Instagram, <https://www.instagram.com/reel/C8Zx0QdpG9c> (last visited June 7, 2025). In an effort to correct the record and publicly defend herself, Plaintiff posted two comments directly addressing the defamatory nature of the statement on the same post. Rather than respond or retract his statement, Lopez took the retaliatory step of blocking Plaintiff's account, thereby silencing and preventing her from engaging with the post or correcting the harmful falsehood in the same public forum where it was made.



13. Upon information and belief, in the days following Plaintiff's discovery of Defendant Lopez's defamatory Instagram post, and his subsequent awareness that Plaintiff had identified and objected to the content, Lopez, either directly or through agents acting on his behalf, including what is believed to be a retained crisis public relations team, initiated a coordinated smear campaign targeting Plaintiff across multiple social media platforms.

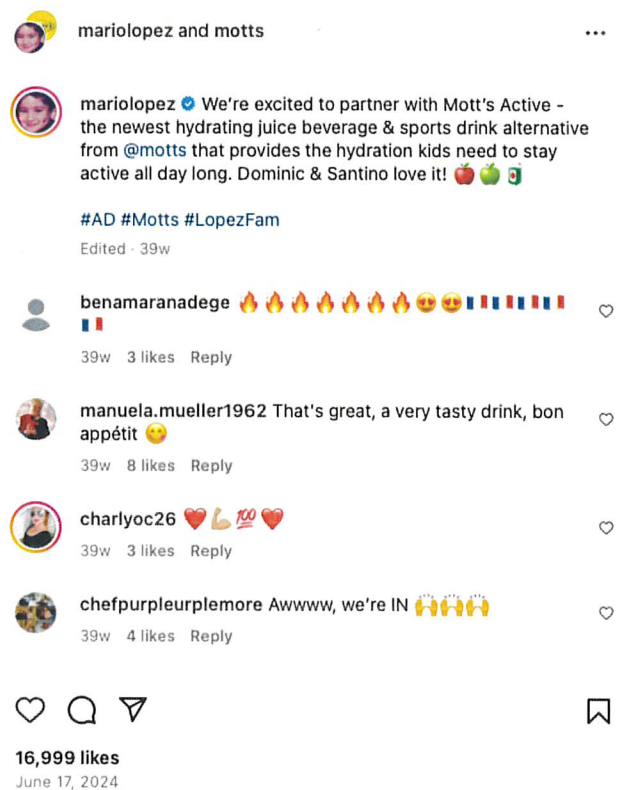
14. Upon information and belief, while Plaintiff is not personally aware of any specific prior smear campaigns orchestrated by Defendant Lopez, such as those potentially used in response to allegations of sexual misconduct or other reputational threats, the rapid escalation from Plaintiff's public confrontation to the launch of a coordinated, multi-platform smear campaign within mere days strongly suggests the existence of a premeditated and well-practiced playbook. Defendant's swift and aggressive deployment of a tactical public relations team to discredit Plaintiff, immediately after learning of her intent to pursue legal action, constitutes not merely retaliation, but a calculated strategy bearing the hallmarks of a familiar response he has likely used before to silence or delegitimize those who challenge him. **The timing, tone, and scale of the attack support a reasonable inference that Lopez is familiar with deploying reputational warfare as a tool of intimidation, particularly when facing potential exposure.**

15. As stated during his appearance on *The Candace Owens Show*, Defendant Lopez publicly defines his personal "brand" around the "5 Fs" of family, faith, food, fitness, and fun. This branding is prominently featured across his widely followed Instagram account, which showcases curated, family-friendly content, inspirational messaging, and a stream of sponsored advertisements. Defendant has carefully cultivated a public image rooted in positivity, wholesomeness, and trustworthiness, an image that stands in stark contrast to the defamatory and malicious conduct he directed toward Plaintiff. His defamatory post about Plaintiff appeared grossly out of character and off-brand, until one considers the underlying motive: **to exploit**

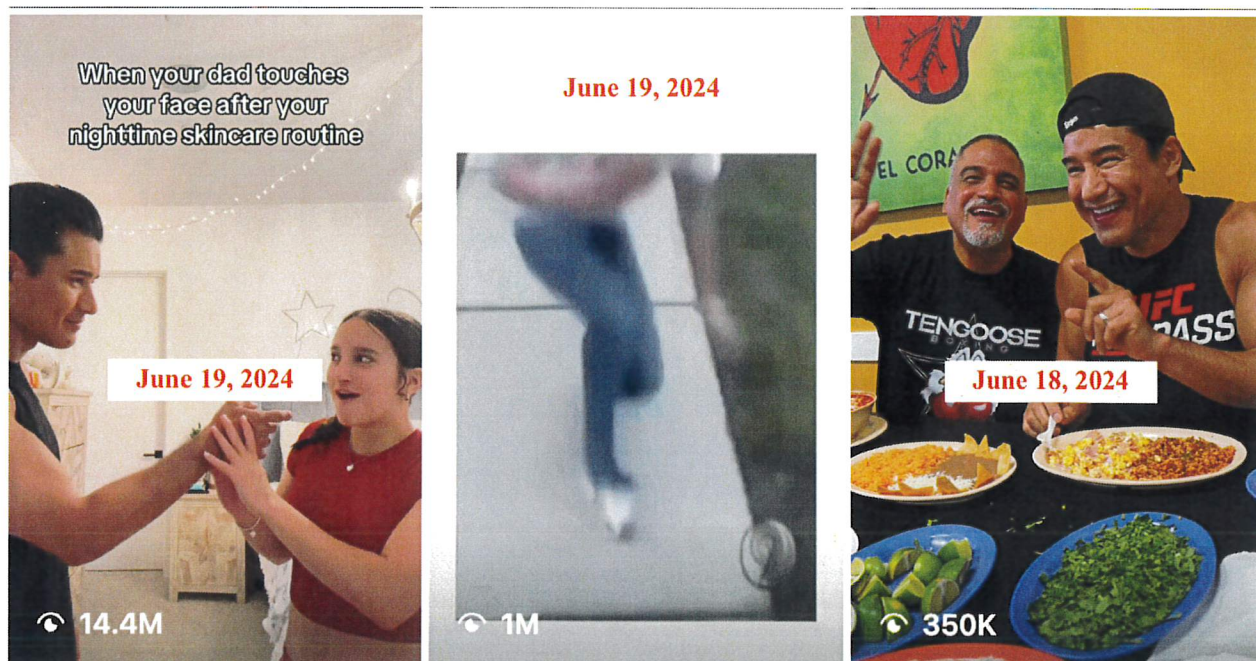


Plaintiff's reputation for his own algorithmic and reputational gain, then discard her once the intended effect was achieved.

16. Upon information and belief, Defendant Lopez's republication of a defamatory *Inside Edition* segment, accompanied by his own defamatory commentary, was strategically timed to manipulate Instagram's engagement algorithm. Two days prior to the defamatory post, on or about June 17, 2024, Defendant had published a paid advertisement with the Mott's juice company, which, under Meta's well-known platform behavior, can suppress organic post visibility. By posting inflammatory and provocative content and commentary likely to drive comments, shares, and user engagement, **Defendant used Plaintiff's reputation as a tool to boost his reach and recover favor in Instagram's unforgiving and opaque algorithm—one that routinely penalizes creators following sponsored content unless they can provoke viral outrage.**



17. Lopez’s attempt to manipulate Instagram’s algorithm appears to have been successful. The defamatory post targeting Plaintiff quickly amassed over 1 million views, followed by a subsequent post that surged to 14.4 million views. This engagement stands in stark contrast to the post Lopez published the day after Mott’s paid advertisement, which reached only 350,000 views. See <https://www.instagram.com/mariolopez/reels> (last accessed June 7, 2025). Upon information and belief, Defendant used the inflammatory nature of his defamatory commentary with Paramount Global’s defamatory content to “recover” his standing within Meta’s algorithm, capitalizing on outrage and public engagement to regain traction after the promotional content suppressed his organic reach. The sudden spike in visibility suggests that Plaintiff was used as a tool for algorithmic gain at the cost of her reputation.



## **B. THE COORDINATED SMEAR CAMPAIGN ACROSS SOCIAL MEDIA**

18. Upon information and belief on or about March 13, 2025, approximately three days after Plaintiff confronted Defendant on Instagram, Lopez, either directly or through agents acting



on his behalf, including a retained crisis public relations team, initiated a coordinated online smear campaign targeting Plaintiff. After Plaintiff discovered Lopez’s defamatory post and was subsequently blocked by him, an anonymous Reddit account operating under the handle “Top-Strategy-1261” began flooding existing threads regarding the Plaintiff with a barrage of approximately eight malicious and defamatory comments about Plaintiff. The timing and nature of these posts strongly suggest retaliatory intent. See <https://www.reddit.com/user/Top-Strategy-1261> (last visited June 7, 2025).

19. In a striking display of irony, a Reddit user operating under the handle “Top-Strategy-1261” targeted multiple posts discussing Plaintiff, engaging in a deliberate effort to defame and discredit her. The username itself—“Top Strategy”—appears to reflect the very tactic employed: a calculated campaign to malign Plaintiff’s character and sway public opinion ahead of the filing of this Complaint. The user referred to Plaintiff as “mentally ill” and “obsessed with Mario Lopez,” comments clearly designed to discredit her credibility and preemptively undermine her claims. At least two of the comments were removed by Reddit moderators for violating platform policies due to their inflammatory and harassing nature. The timing, tone, and focus of the posts suggest that this was not random internet trolling, but rather part of a broader strategy to suppress Plaintiff’s voice through public ridicule and reputational harm.

r/skeptic ·



‘Flu Shot Cheerleader’ speaks out years after stoking anti-vaccine movement: Desiree Jennings went viral in 2009 after claiming she had been injured by a seasonal flu shot. Jennings has changed her perspective since then and is speaking out on being used by the anti-vaccine movement's “PR machine.”

**Top-Strategy-1261** replied to **Benocrates** 18 days ago

You’re asking excellent questions. She has an instagram called cheerleader4change. It’s absolute madness. Seems she is legitimately mentally ill. Not a reliable narrator at all.

↑ 1 ↓    Reply    Share    ...



r/illnessfakers • Desiree Jennings- Dystonia

**Top-Strategy-1261** replied to **wet-otter** 18 days ago

Check out her instagram handle @cheerleader4change. She's obsessed with Mario Lopez and James Franco. Runs multiple websites targeting them. It looks like she has legitimate mental illness and I feel bad for her. Regardless, the vaccine court case proves she was still trying to connect vaccine injury to her "symptoms" and now is claiming she has stiff person syndrome like Celine Dion. Except there's no proof of this, and it's even addressed in the vaccine court case. All very strange.

↑ 1 ↓    ○ Reply    ➦ Share    ...



r/illnessfakers • Desiree Jennings- Dystonia

**Top-Strategy-1261** replied to **Connect-Membership** 18 days ago

You should check out her current instagram handle @cheerleader4change and witness the absolute madness that unfolded. I'm really surprised the media hasn't picked up on it. It's a bit sad as it looks like she's actually mentally ill, but with a huge axe to grind against James Franco apparently?

↑ 1 ↓    ○ Reply    ➦ Share    ...

20.        The smear campaign did not end with Reddit. On or about April 4th and 5th, 2025, and less than one month after Plaintiff publicly confronted Defendant Lopez on Instagram regarding his defamatory post, two TikTok accounts, @lightlyseasonedmike (www.tiktok.com/@lightlyseasonedmike) and @difyoucatchthis (www.tiktok.com/@difyoucatchthis), each republished the same defamatory video segment that had been obtained and used by Defendant Lopez. One of the accounts, @lightlyseasonedmike, not only reposted the defamatory segment but escalated the attack by adding its own defamatory commentary, portraying Plaintiff as deceptive and untrustworthy in connection with her medical history. The TikTok videos prominently featured footage from a February 4, 2010 broadcast of *Inside Edition*, a clip with a long, damaging legacy that has significantly contributed to widespread public misunderstanding of Plaintiff's condition. This very segment is also the subject of a separate

defamation lawsuit currently pending in federal district court against Paramount Global, CBS Broadcasting Inc., and Inside Edition Inc. See *Desiree Guerriere Townsend v. Paramount Global, CBS Broadcasting Inc., and Inside Edition Inc.*, No. 2:25-cv-04077 (United States District Court for the Central District of California filed May 7, 2025).

21. Upon information and belief, as of June 7, 2025, the two TikTok videos that formed part of the targeted smear campaign against Plaintiff have collectively garnered approximately 9 million views, over 774,200 likes, and more than 12,000 comments, many of which included harassing, mocking, or threatening language directed at Plaintiff. The viral spread of these videos dramatically escalated the reputational harm and emotional distress experienced by Plaintiff, as the online harassment spilled onto Plaintiff's personal TikTok account, which was inundated with hateful and abusive comments and messages. The content and commentary not only defamed Plaintiff, but also painted her in a false light, portraying her as mentally unstable, dishonest, and attention-seeking, thereby compounding the public ridicule and humiliation she endured.

22. Plaintiff's personal TikTok account became the target of public backlash after the Defendants' defamatory videos began circulating in the feeds of millions of users. One of Plaintiff's own videos—featuring footage of her walking in Newport Beach, California, around 2023—garnered over 770,000 views and was inundated with hundreds of defamatory and abusive comments, further amplifying the reputational harm and emotional distress inflicted upon her. See <https://www.tiktok.com/t/ZTjsg52r3/> (last accessed June 9, 2025). In both substance and presentation, these videos painted Plaintiff in a false light, distorting her character and public image in a manner that would be highly offensive to a reasonable person, and amplifying a malicious narrative that bore no resemblance to her lived reality.

23. Upon information and belief, the timing, sourcing, and coordinated nature of the two TikTok videos, posted less than 24 hours apart, and shortly after Plaintiff publicly confronted



Defendant Lopez and signaled her intent to pursue legal action, strongly suggest the involvement of Lopez himself or individuals acting at his direction or in concert with him. The swift rollout, coupled with the striking similarity in content, tone, and coordinated use of a difficult-to-access *Inside Edition* segment, strongly suggests a calculated and strategic campaign to smear Plaintiff and undermine her credibility in anticipation of this lawsuit.

24. This coordination may have included the use of public relations affiliates, social media contractors, or other agents acting on behalf of Defendant Lopez, including Doe Defendants such as media consultants, digital content managers, or paid influencers. The proximity in time to Plaintiff's public confrontation and the scale of virality achieved reflect a calculated campaign, not an organic resurgence. Links to the original defamatory videos are as follows: <https://www.tiktok.com/t/ZT2oJ14MG/> and <https://www.tiktok.com/t/ZT2otJLVA/> (last accessed June 7, 2025).

25. The irony of Defendant Lopez's conduct is striking: while publicly defaming Plaintiff and attacking her credibility, Lopez himself has currently become the subject of viral discourse across multiple social media platforms. The public is actively resurfacing and scrutinizing past allegations against him—including claims of sexual misconduct, instances of entitled behavior, and a series of questionable associations. Notably, Lopez was seen affectionately embracing controversial internet personality Andrew Tate at a UFC event on or about March of 2025, just days before reports emerged as part of a civil lawsuit alleging Tate's assault of his ex-girlfriend at the Beverly Hills Hotel. The fact that Defendant would weaponize his platform to malign Plaintiff's character while he remains entangled in ongoing reputational controversies and disturbing affiliations, reveals not only staggering hypocrisy, but also a deeply cynical abuse of his public influence.

**B. MARIO LOPEZ, PARAMOUNT GLOBAL & ACTUAL MALICE**

26. Defendant Lopez appears to have had exclusive access to the defamatory *Inside Edition* footage originally broadcast in 2010, content that upon information and belief, had not been widely available on social media and remained restricted to Paramount Global's digital platforms. Given the segment's long-standing copyright protections and its unavailability through standard social media or public distribution channels, serious questions arise as to how, and from whom, Lopez obtained the footage. Its sudden reappearance, first on Lopez's Instagram account and then in two widely circulated TikTok videos that surfaced shortly after Plaintiff publicly confronted him—strongly indicates that the segment was sourced from an internal media archive or provided through direct industry contacts at Paramount Global, rather than acquired through any organic or publicly accessible means.

27. Given Defendant Lopez's longstanding position within the entertainment industry, particularly his professional affiliations with NBCUniversal and *Access Hollywood*, it is reasonable to infer that he obtained the *Inside Edition* footage through private media channels, most plausibly from individuals within Paramount Global or CBS Broadcasting Inc., both of whom are named Defendants in a separate federal defamation lawsuit currently pending in the Central District of California. *See Townsend v. Paramount Global*, No. 2:25-cv-04077. The timing and circumstances suggest that Lopez was made aware of the original segment's prior virality and, with the implicit or explicit cooperation of Paramount Global, republished the footage to boost engagement on his Instagram account following a preplanned advertisement for Mott's.

28. This exchange appears mutually beneficial: **Paramount gained renewed attention for its ailing *Inside Edition* brand, while Lopez reaped the algorithmic rewards of manufactured virality.** The selective retrieval and calculated republication of difficult-to-access, copyright-protected content points not to coincidence, but to a coordinated effort between

Defendant Lopez and Paramount Global—executed with strategic intent, not organic discovery.

29. More troublingly, Defendant’s professional background as a television host, media figure, and public-facing journalist, who has himself covered multiple stories involving individuals, allegations, and controversies, requires him to exercise a heightened duty of care and awareness regarding the power and consequences of defamatory publications. Lopez is not an uninformed bystander reacting to viral content, he is a seasoned media professional who has spent decades within the entertainment news ecosystem and, given the resurfacing of serious allegations against him, is acutely aware of the reputational consequences such accusations can carry.

30. Notably, Lopez was aware of Plaintiff’s real-life medical condition as recently as August of 2023, when NBC News ran a human-interest segment about her, which aired nationally. Upon information and belief, following its release, the 2023 NBC segment was internally circulated and pitched for broader coverage across multiple NBCUniversal-affiliated programs, including, presumably, *Access Hollywood*, where Defendant Lopez serves as a longtime host. Given his direct affiliation with the network and the internal visibility of the segment, it is reasonable to infer that Lopez had access to accurate and updated information about Plaintiff, making his decision to promote outdated and defamatory content all the more reckless and malicious.

31. The segment was produced by NBC journalist Brandy Zadrozny, and its internal circulation within NBCUniversal further supports the inference that Defendant Lopez had actual or, at minimum, constructive knowledge of the truth regarding Plaintiff prior to republishing the defamatory content with his own defamatory commentary. That Lopez chose to ignore more recent and credible reporting—**produced by his own parent media organization**—in favor of amplifying an outdated and discredited segment, demonstrates a knowing disregard for the truth. His decision to publicly defame Plaintiff using the false narrative of a media organization,

Paramount Global and its subsidiaries CBS Broadcast Inc. and Inside Edition Inc., long challenged for its accuracy, while deliberately sidestepping more accurate and contemporaneous information readily available to him at NBCUniversal, further supports a finding of malice. Defendant's actions were not merely reckless, they were professionally and ethically indefensible.

32. In approximately 2023, Plaintiff was featured in two episodes of *This Week in Virology*, a podcast hosted by Columbia University virologist Vincent Racaniello, Ph.D., where she provided an in-depth explanation of her condition, including its symptoms, etiology, and the fact that she was undergoing treatment and taking prescribed medication at the time she was filmed by *Inside Edition*. Given Plaintiff's continued and ongoing efforts to educate the public and correct misinformation, Defendant's failure to consider or acknowledge these efforts before publishing his defamatory statement demonstrates a reckless disregard for the truth. This is especially egregious given that he operates under the same corporate umbrella as NBCUniversal, which produced Plaintiff's updated news segment in August 2023. Defendant's actions are further compounded by the fact that Plaintiff has proactively addressed these issues in the public sphere, making his baseless attack not only intentional, but malicious.

### **C. PLAINTIFF'S PROFESSIONAL STANDING AND PUBLIC IMPACT**

33. After years of immune-suppressive therapy and intensive lifestyle modifications to manage her disability, Plaintiff's condition eventually stabilized, allowing her to reenter the workforce full-time. Her first full-time position was as an intellectual property legal assistant at Outpace Bio, Inc., a biotechnology company headquartered in Seattle, Washington. There, she contributed to the development and management of the company's intellectual property portfolio, including pending and issued patents involving chimeric antigen receptor T-cell (CAR-T) technology. Despite receiving a stellar performance review, Plaintiff's employment was abruptly and prematurely terminated after her employer became aware of the defamatory narrative about

her circulating online.

34. Plaintiff currently works as a litigation and intellectual property paralegal for law firms based in the Los Angeles area. She holds a Bachelor of Science in Biochemistry and Molecular Biology from the University of California, Irvine (UCI), where she also conducted scientific research in the Gershon Laboratory, assisting in the analysis of mass spectrometry data related to the molecular structure of the vaccinia virus. Her STEM background qualifies her to sit for the United States Patent and Trademark Office (USPTO) registration exam to become a licensed patent practitioner.

35. In the fall of 2024, Plaintiff spent several months in Washington, D.C., advocating for expanded access to legal services for underserved individuals and small businesses, as well as for the restoration of the trademark logo of former Washington Redskins figure Chief Two Guns White Calf. She lobbied members of Congress, including those on the Senate and House Judiciary Subcommittees on Intellectual Property, urging the creation of a federal registration system for non-attorney trademark practitioners. Modeled after the Patent Office's existing process for licensing patent agents, this proposed reform would significantly reduce the cost barrier to federal trademark protection by allowing qualified individuals to represent clients before the USPTO without a law degree. A 32-page draft of the proposed legislation, titled The Chief Two Guns White Calf Trademark Integrity Act of 2025, is currently under review by Congressman Lance Gooden of Texas and his legislative team.

36. In 2009, Plaintiff was employed as a Marketing Communications Manager, where she developed scripting and authored internal content for the technical phone queues at AOL. Previously she worked within AOL's Public Relations and Communications Department on internal and external messaging initiatives, contributing to the company's corporate communication strategy. During the summer of 2009, Plaintiff was selected to serve as a



Washington Redskins Cheerleader Ambassador, representing the team at official events and community engagements.

37. Plaintiff previously served as a registered securities representative at Morgan Stanley, one of the largest global investment firms. She held multiple advanced financial licenses, including Series 7, Series 66, and Series 31, authorizing her to advise clients and execute trades in securities, futures, options, and commodities. These credentials reflect a high level of financial acumen, professional trust, and regulatory clearance—further underscoring the reputational damage caused by Defendants’ defamatory actions.

38. Plaintiff’s accomplishments and public perception stand in stark contrast to those of Defendant Mario Lopez, who—**despite the resurfacing of multiple sexual misconduct allegations on social media**—continues to enjoy a thriving media career, including his role at *Access Hollywood*. Meanwhile, Plaintiff has been publicly vilified and discredited for no greater offense than suffering from a rare neurological condition, one that the medical community itself has historically struggled to fully understand or diagnose.

39. Despite enduring over 16 years of media-driven scrutiny, mockery, and reputational harm, Plaintiff has made every effort to rebuild her life and restore her professional standing. Since 2009, she has dedicated herself to public service and professional advancement, including working in the legal field, advocating for trademark reform before Congress, and actively pursuing registration as a patent agent. In sharp contrast, Defendant Lopez appears to face minimal professional consequences despite repeated allegations of sexual misconduct and a well-documented pattern of entitled behavior.

40. Defendant’s defamatory statement, along with the newly viral smear campaign carried out by Defendant and Does, has revictimized Plaintiff and retraumatized her by reigniting the same false narratives that have plagued her for over a decade. These defamatory attacks have

effectively dismantled years of hard-earned professional progress within the Los Angeles business community, severing relationships with law firms, universities, and respected members of the public. As a direct result of Defendant Lopez's smear campaign, many of these individuals have encountered the defamatory content in their social media feeds, including Defendant's Instagram post and the widely circulated TikTok videos tied to the coordinated effort to discredit Plaintiff.

41. Plaintiff brings this lawsuit, filed *pro se*, not only to protect her own livelihood, but to shield her current employer from the collateral damage of false, defamatory allegations that continue to circulate globally due to the reckless actions of an entitled celebrity Defendant. This action is about reclaiming truth and holding those in power accountable, including the Defendant whose own name is shadowed by a history of rape accusations. This action seeks justice not just for herself, but serves as a public warning to all the powerful men of Hollywood who victimize and silence children, women, and men alike: **Your time is up. This lawsuit is the first of many measures that will bring overdue accountability to every enabler, predator, and powerbroker who has upheld this morally bankrupt industry's legacy of abuse and silence.**

### **FIRST CLAIM FOR RELIEF**

**(Defamation)**

**Plaintiff Townsend v. All Defendants**

42. Ms. Townsend hereby repeats, reiterates, re-alleges and incorporates by reference each and every allegation of the Complaint as if set forth fully herein.

43. Ms. Townsend is a private figure.

44. As alleged hereinabove, Defendants Mario Lopez and Does 1 to 50, inclusive, either directly or through their agents, employees, crisis public relations teams, or social media contractors, published, caused the publication of, participated in the publication of, and/or reasonably should have foreseen that their conduct would result in the publication and viral

dissemination of materially false and defamatory statements of fact about Plaintiff. These defamatory statements included but were not limited to false claims that Plaintiff was “faking” her neurological illness, was mentally unstable, and had fabricated her condition for attention—statements that were spread across Instagram, TikTok, and Reddit, reaching millions of viewers and causing substantial reputational and emotional harm.

45. Defendants Mario Lopez and Does 1 through 50, inclusive, through their agents, public relations affiliates, and/or social media operatives, intentionally made and disseminated false statements of fact and republished content that conveyed a false and defamatory meaning about Plaintiff. These statements, initially posted by Defendant Lopez on his Instagram account and subsequently echoed in coordinated TikTok videos and Reddit commentary, were reasonably understood by the public to imply that Plaintiff was mentally unstable, dishonest, and fabricating or exaggerating a rare medical condition for public attention. Defendant Lopez’s own remarks, including a comment suggesting Plaintiff deserved “an Oscar,” falsely characterized her as a fraud and attention-seeker. The defamatory implications of these statements—that Plaintiff was deceitful, emotionally unwell, and untrustworthy—were widely circulated and understood to malign her personal integrity, credibility, and professional reputation. These statements were false and were made with actual malice or with reckless disregard for the truth, particularly given Defendant Lopez’s position as a seasoned media professional with access to accurate information through internal NBCUniversal channels.

46. As a reasonably foreseeable, and in fact intended, consequence of Defendants’ actions, third parties repeated, reposted, and amplified these false and defamatory statements across various media platforms, causing ongoing and compounding harm to Plaintiff’s reputation, livelihood, and well-being.

47. The defamatory nature of Defendants’ statements and coordinated social media

campaign is evident on its face. Defendant Mario Lopez, by republishing a misleading and outdated *Inside Edition* segment, part of a separate federal defamation lawsuit, alongside his own false and mocking commentary on Instagram, intentionally conveyed defamatory implications about Plaintiff—that she was mentally unstable, dishonest, and seeking attention under false pretenses. These misrepresentations were amplified by multiple TikTok videos and Reddit posts from accounts reasonably believed to be affiliated with or acting on behalf of Defendant Lopez and/or his public relations team. These posts employed selective video clips, inflammatory language, and sensationalist framing that falsely portrayed Plaintiff as fabricating her condition. These statements and implications were presented as fact and designed to incite public ridicule, harassment, and reputational destruction. Upon information and belief, the *Inside Edition* video clip used in Defendant Lopez’s post has since been removed from Paramount Global’s digital platforms—an implicit acknowledgment of its defamatory nature and the harm it has inflicted upon Plaintiff.

## **SECOND CLAIM FOR RELIEF**

**(False Light Invasion of Privacy – California Const., Art. I, § 1)**

**Plaintiff Townsend v. All Defendants**

48. Ms. Townsend hereby repeats, reiterates, re-alleges and incorporates by reference each and every allegation of the Complaint as if set forth fully herein.

49. As alleged hereinabove, Defendants Mario Lopez and Does 1 to 50 publicly disclosed false and misleading information about Plaintiff’s medical condition, personal history, and moral character—most notably by republishing an outdated and defamatory *Inside Edition* segment alongside his own mocking commentary, and by triggering or coordinating a viral smear campaign across TikTok and Reddit. These acts portrayed Plaintiff in a false light that would be highly offensive to a reasonable person and were clearly designed to provoke public ridicule,

humiliation, and widespread distrust. The effect was to distort the truth of Plaintiff's lived experience and maliciously recast her as a manipulative, unstable figure, when in fact she suffers from a rare neurological condition misunderstood even by medical professionals.

50. The false light created by Defendants Lopez and Does 1 to 50 would be highly offensive and objectionable to a reasonable person in Plaintiff's position, as it falsely cast Plaintiff as mentally unstable, dishonest, and attention-seeking, turning her into the object of public scorn, ridicule, humiliation, and baseless suspicion. This portrayal was not only inaccurate, but deliberately calculated to damage her reputation and personal dignity in the eyes of the public.

51. Defendants Lopez and Does 1 to 50 knew, or acted with reckless disregard as to whether, their public disclosures, including Lopez's Instagram post and the subsequent viral TikTok smear campaign, would create a false and misleading impression about Plaintiff, namely that she was mentally unstable, dishonest, or fabricating her medical condition. Defendants proceeded with publication and amplification of these defamatory narratives in conscious disregard of the truth and the profound harm it would inflict on Plaintiff's reputation and livelihood.

52. As a direct and proximate result of the false, misleading, and widely disseminated defamatory statements made and orchestrated by Defendant Mario Lopez and Does 1 to 50, Plaintiff has suffered significant damage to her professional reputation, career prospects, and personal credibility. The public smear campaign, including Lopez's defamatory Instagram post and the coordinated viral videos, triggered a sudden and destructive shift in public perception, leading to severe emotional distress, including anxiety, humiliation, and reputational trauma. Plaintiff has experienced tangible professional setbacks, including loss of employment, interference with business relationships, and diminished future earning potential across the legal, media, and advocacy fields in which she works.



53. The conduct of Defendants Mario Lopez and Does 1 to 50, as described herein, was a substantial factor in causing Plaintiff serious reputational and emotional harm, constituted a grave invasion of her right to privacy, and reflected an egregious abuse of influence and media power, conduct so extreme and outrageous it shocks the conscience. Defendants acted with oppression, fraud, and malice by initiating, amplifying, and allowing the viral spread of defamatory and misleading narratives about Plaintiff across multiple social media platforms. Despite knowing or having reason to know the truth, they failed to retract, correct, or mitigate the damage. Accordingly, Plaintiff is entitled to an award of punitive and exemplary damages in an amount to be determined at trial.

**THIRD CLAIM FOR RELIEF**  
**(Intentional Infliction of Emotional Distress)**  
**Plaintiff Townsend v. All Defendants**

54. Ms. Townsend hereby repeats, reiterates, re-alleges and incorporates by reference each and every allegation of the Complaint as if set forth fully herein.

55. Defendants Mario Lopez and Does 1 to 50, as alleged herein, engaged in extreme and outrageous conduct with the intent to cause, or with reckless disregard for the probability of causing, Plaintiff severe emotional distress. Immediately following Plaintiff's public confrontation of Defendant Lopez regarding his defamatory Instagram post, Defendants launched or participated in a coordinated smear campaign across multiple social media platforms, republishing misleading and outdated footage alongside commentary that painted Plaintiff as mentally unstable, dishonest, and obsessed.

56. As a direct and substantial result of Defendants' wrongful and malicious conduct, Plaintiff suffered severe emotional distress.

57. Defendants' acts were willful, wanton, malicious, oppressive, and carried out in

conscious disregard for Plaintiff's rights, thereby justifying an award of punitive and exemplary damages according to proof at trial.

**PRAYER FOR RELIEF**

Wherefore, Plaintiff prays for judgment as follows:

1. For total damages in the amount of \$10,000,000.
2. For general damages, including emotional distress damages, according to proof on each cause of action for which such damages are available.
3. For special damages, according to proof of each cause of action for which such damages are available.
4. For compensatory damages, including emotional distress damages according to proof on each cause of action for which such damages are available.
5. For punitive damages and/or exemplary damages, as allowed by law, in an amount according to proof on each cause of action for which such damages are available.
6. For prejudgment interest and post-judgment interest according to law.
7. For costs of suit incurred in this action.
8. For such other and further relief that the Court deems proper and just.
9. Plaintiff affirms that all monetary awards obtained in connection with this action will be donated to Women In Media, a registered 501(c)(3) nonprofit organization based in Los Angeles, California, to support its mission of advancing equality and inclusion within the entertainment industry.

Dated: June 13, 2025

By:   
DESIREE GUERRIERE TOWNSEND  
Plaintiff