1	DESIREE TOWNSEND 2901 Ocean Park Blvd, Ste. 201	Electronically FILED by Superior Court of California, County of Los Angeles			
2	Santa Monica, California 90405	8/1/2025 8:00 AM David W. Slayton,			
3	(323) 844-1338 RESPONDENT <i>IN PRO SE</i>	Executive Officer/Clerk of Court, By D. Galvez, Deputy Clerk			
4					
5	SUPERIOR COURT OF THE STATE OF CALIFORNIA				
6	FOR THE COUNTY OF LOS ANGELES				
7					
8	MARIO LOPEZ,	CASE NO. 25STRO03858			
9	Petitioner,	ASSIGNED FOR ALL PURPOSES TO			
10	V.	HON KIMBERLY REPECKA, DEPT. 65			
11	DESIREE TOWNSEND,	RESPONDENT DESIREE TOWNSEND'S			
12	,	1. NOTICE OF MOTION AND SPECIAL MOTION TO STRIKE			
13	Respondent.	[CODE CIV. PROC. § 425.16] OR,			
14		ALTERNATIVELY, 2. OPPOSITION TO PETITION FOR			
15		INJUNCTION UNDER CODE CIV. PROC. § 527.6;			
16		DECLARATION OF DESIREE			
17		TOWNSEND; AND			
18		3. EXHIBITS			
19		Date:			
20		Time: 65			
21		Вери. 03			
22					
	PLEASE TAKE NOTICE that on	, at, or as soon thereafter as the			
23	matter may be heard, in Department 65 of the	above-entitled Court, located at 1945 S Hill St., Los			
24	Angeles, CA 90007, Respondent Desiree Townsend will and hereby does move the Court for an order				
25	striking the Petition in its entirety pursuant to C	Code of Civil Procedure § 425.16. The Petition arises			
26	from Townsend's constitutionally protected acti	vity, including lawful litigation conduct and speech in			
27	connection with matters of public interest invo	olving an admitted public figure. As such, the entire			
28					

Petition constitutes a strategic lawsuit against public participation ("SLAPP") and must be stricken.

This Special Motion to Strike is brought on the grounds that the entirety of Petitioner Mario Lopez's civil harassment petition constitutes a strategic lawsuit against public participation ("SLAPP") within the meaning of Code of Civil Procedure § 425.16. The Petition is based entirely on Townsend's constitutionally protected activity, including her social media commentary on matters of public concern involving an admitted public figure, her ongoing legal proceedings with Petitioner, and Petitioner's public conduct. These communications and litigation-related actions fall squarely within the protections of § 425.16(e)(3) and (e)(4), as they are directly connected to issues subject to governmental and judicial scrutiny and were made in a public forum on matters of widespread interest.

In addition, the video documenting Petitioner being lawfully served, which was captured and shared as part of the public record of litigation events, further supports Townsend's constitutionally protected right to speak on legal matters in a public forum. Petitioner cannot demonstrate a probability of prevailing on the merits of any of these claims.

Moreover, to the extent the Petition seeks to enjoin or penalize statements made in connection with Townsend's pending defamation lawsuit—including lawful service of process, case updates, and references to involved parties—such speech is absolutely protected under the litigation privilege codified in Civil Code § 47(b). Accordingly, the challenged speech cannot, as a matter of law, support the issuance of a civil harassment restraining order.

In the alternative, this Court should deny Petitioner's request for a harassment restraining order even apart from Code of Civil Procedure § 425.16, because the petition fails to satisfy the statutory requirements of § 527.6. As further discussed in Part III.C below, the alleged conduct—consisting primarily of constitutionally protected activity, including expressive speech and a one-time lawful act of process service—does not meet the legal standard for "harassment" under the statute and does not justify issuance of a restraining order. Furthermore, to the extent the petition is based on actions arising out of ongoing litigation, such as process serving and public commentary on the proceedings, those actions are absolutely protected under the litigation privilege codified in Civil Code § 47(b), which bars liability for any communication or act undertaken in connection with a judicial proceeding.

Townsend's Special Motion to Strike is based on this Notice, the attached Memorandum of Points and Authorities, the Declaration of Desiree Townsend and its Exhibits, the records and pleadings on file in this case, and such other evidence as may be presented. Respectfully Submitted, Dated: August 1, 2025 Desiree Townsend Pro se

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MEMORANDUM OF POINTS AND AUTHORITIES

MOTION TO STRIKE UNDER § 425.16

Petitioner Mario Lopez, a widely recognized public figure and national entertainment personality, improperly seeks a harassment restraining order in response to Respondent's constitutionally protected conduct—including social media commentary, public statements concerning issues of significant public interest, and a one-time, lawful act of process service related to pending litigation. As a celebrity with substantial access to media platforms and a history of public engagement, Lopez is subject to a heightened threshold for First Amendment protections under both federal and state law. The challenged conduct includes commentary directly connected to ongoing litigation, namely, a defamation lawsuit against Lopez and Paramount Global alleging that Lopez helped disseminate a false narrative portraying Respondent as having fabricated a medically diagnosed neurological disability. These allegations, now the subject of active litigation, are privileged under California Civil Code § 47(b).

Rather than refute these claims through appropriate legal channels, Lopez now seeks to silence Respondent by weaponizing the restraining order process as a form of censorship. Upon information and belief, an individual acting on behalf of Petitioner boasted that \$50,000 was spent solely on a retainer for this proceeding, underscoring that the petition was filed in bad faith as a calculated effort to intimidate and suppress constitutionally protected speech. That same individual later exposed Respondent's personal cell phone number online. (See Exhibit A). The petition constitutes an unconstitutional prior restraint and an impermissible gag order, aimed at silencing commentary on a high-profile lawsuit involving a public figure. It seeks to suppress discourse on matters of public concern, including prior allegations levied against Petitioner Lopez and the misuse of the restraining order process as a public relations tactic. That demand is baseless, and this Court should grant Respondent Townsend's anti-SLAPP motion to strike the speech-based portions of the Petition.

In the alternative, and without waiving the right to file a separate Supplemental Opposition, the evidence and arguments presented herein further support denial of the Petition in its entirety.

I. Introduction

Desirée Townsend is a litigation paralegal and the plaintiff in a defamation and harassment

lawsuit filed against Petitioner Mario Lopez. (See *Townsend v. Lopez*, LASC Case No. 25NNCV04089). In connection with the lawsuit, Townsend has made a series of social media posts and public commentary addressing the factual allegations and legal claims asserted in her complaint. These posts are directly tied to the ongoing litigation and constitute constitutionally protected speech concerning matters of public interest involving an admitted public figure. As part of the litigation process, Townsend also recorded as evidence and later publicly shared a video documenting the lawful service of process on Lopez, a one-time procedural event that further underscores the legal nature of her conduct. Both the commentary and the video evidence of the service of process fall squarely within the protections of the First Amendment and the litigation privilege under Civil Code § 47(b).

Mario Lopez is a public figure and media personality who has long been a subject of public commentary and scrutiny. Over the years, he has been linked to various controversies that have made him the target of widespread discussion on matters of public concern, including past allegations of sexual misconduct dating back to the 1990s. More recently, Lopez was seen on video at a UFC event embracing Andrew Tate, an internet personality currently facing charges in Romania for alleged human trafficking and participation in a criminal enterprise exploiting women. This and other publicly available matters of legitimate public concern, already widely reported online, are what Respondent has addressed in her commentary, including coverage of Petitioner's interaction with Andrew Tate¹. These public associations and controversies place Lopez squarely within the realm of public discourse, making commentary on his conduct protected under the First Amendment.

Respondent Townsend's commentary, whether in her publicly filed defamation lawsuit or on social media, has consistently remained within the bounds of constitutionally protected speech. At no point did she threaten Petitioner with violence or assert as a matter of fact that he committed any crime. In contrast, Lopez in his Petition has described Respondent as "delusional," "unhinged," and suffering from a "mental health disorder." These statements not only support Respondent's defamation claims currently pending against Petitioner, but they also constitute inadmissible layperson opinion on mental health. Under California Evidence Code §§ 720 and 801, **testimony concerning a person's**

¹Melissa Willets, *Mario Lopez Criticized After Hugging Andrew Tate*, Distractify (July 9, 2024), https://www.distractify.com/p/mario-lopez-hugs-andrew-tate.

psychological condition requires qualification as an expert, and lay opinions are inadmissible where they pertain to complex medical or psychological diagnoses.

Petitioner Mario Lopez has improperly invoked Code of Civil Procedure § 527.6 not to address any credible threat of harassment, but as a retaliatory tactic in response to Respondent's recently filed defamation lawsuit against him. Rather than seeking protection from legitimate harassment, Petitioner appears to be using this proceeding to reframe himself in the press as a "victim" while continuing to target Respondent through reputational and psychological harm.

Moreover, as detailed below, Petitioner's verified TikTok account—as well as an account believed to belong to Petitioner's attorney, Alexandra Kazarian, who styles herself as a legal influencer and has repeatedly inserted herself into high-profile criminal cases and viral media narratives, including the Menendez brothers—has actively engaged with content on Respondent's page. This performative and opportunistic behavior, consistent with a pattern of fame-chasing rather than legal advocacy, directly undermines any assertion of a credible threat under § 527.6 and further supports the conclusion that this petition was filed in bad faith as part of a coordinated PR stunt and retaliatory smear effort against Respondent. Rather than a protective measure, this petition appears to be a continuation of the media smear campaign detailed in Respondent's defamation lawsuit against Mr. Lopez.

California law provides a clear procedural remedy for silencing attempts made under the guise of restraining order petitions: the anti-SLAPP statute (Cal. Code Civ. Proc. § 425.16). That statute applies equally to actions brought under Code of Civil Procedure § 527.6, and mandates dismissal where the claims arise from protected speech.

Under § 425.16, the Court must grant Respondent Townsend's special motion to strike because:

- 1. The petition arises from protected activity. Specifically, Respondent's constitutionally protected commentary made on social media and in connection with her pending defamation lawsuit against Petitioner Mario Lopez. These statements squarely fall within her rights of petition and free speech under both the United States and California Constitutions concerning matters of public interest, celebrity misconduct, and retaliatory legal action which covers Townsend's social media posts and lawsuit.
- 2. Petitioner Lopez cannot meet his burden of establishing a probability of prevailing on the

merits. As detailed herein, there is no credible threat of violence, and the petition itself is riddled with speculative, defamatory, and retaliatory assertions lacking evidentiary or legal support.

Accordingly, Respondent Townsend respectfully requests that the Court grant her anti-SLAPP motion and strike the petition in its entirety. In the alternative, the same factual and legal arguments outlined herein establish that the petition must also be denied on the merits under § 527.6, and those arguments are incorporated by reference for that purpose.

II. Statement of Relevant Facts

Townsend is a litigation and intellectual property paralegal who actively advocates for increased access to legal services, including reform efforts aimed at removing the law school requirement for legal practice. She regularly publishes legal commentary and analysis on high-profile civil litigation, intellectual property disputes, and broader legal issues. Her work forms part of a public interest mission to shed light on the misuse of judicial processes, particularly the retaliatory use of courts by public figures, and to challenge the systemic barriers that enable intimidation, reputational smears, and the silencing of victims. (Townsend Decl. ¶ 1.)

As detailed in the Declaration of Desiree Townsend, her recent coverage has included analysis of the defamation lawsuit she filed against Petitioner Mario Lopez, including references to longstanding public allegations of sexual assault and widely circulated commentary concerning *his* entitled and inappropriate behavior in public—comments that have been echoed for years across social media and the internet. Notably, despite this extensive public discourse, Petitioner has not filed similar petitions against any of the numerous individuals who have made such remarks, further underscoring that this action is retaliatory and selectively targeted at Respondent for her protected legal activity.

Lopez's Petition relies on selectively cherry-picked phrases such as "serial rapist," "grapist," "clown," and "D-list has-been," presented without their full context in an attempt to mischaracterize constitutionally protected speech as harassment and fabricate the appearance of unlawful harm. He further uses these isolated phrases to support speculative and inflammatory claims, including unfounded assertions that Respondent suffers from a "mental health disorder" or is experiencing "delusions," despite lacking any mental health expertise. **Respondent respectfully requests that the Court strike**

from the Petition all references that purport to offer layperson psychological diagnoses, specifically terms such as "mental health disorder," "delusional," "unhinged," or any similarly defamatory and inflammatory language which serve only to advance a broader smear campaign against the Respondent and have no probative value in establishing a credible threat under the statute.

Furthermore, Petitioner Lopez attempts to frame Respondent Townsend's video evidence documenting the lawful service of process at his residence—as an invasion of privacy or harassment. However, the footage captures only the exterior of the home from a public vantage point and does not reveal any private or sensitive information. Importantly, Petitioner himself has repeatedly shared images and videos of the same residence on his own public social media accounts, thereby negating any reasonable expectation of privacy. Moreover, the address of the property, conspicuously absent from the video evidence, has already been disclosed in publicly filed court documents in an unrelated civil action, *Mario Lopez, et al. vs. Grandway Construction, LLC, et al.*, LASC Case No. 23STCV30154. As such, Petitioner cannot now seek to restrain Respondent's speech regarding a matter made public through official court proceedings and Petitioner's own social media activity, including the following:

- Instagram Reel posted by Petitioner on or about January 15, 2025, available at:
 www.instagram.com/reel/DE2u2pVyYjB/?igsh=NTc4MTIwNjQ2YQ%3D%3D
 This video, promoting Petitioner's shoe line and tequila, prominently features the exterior of his home and has received approximately 10.5 million views during the L.A. fires.
- 2. Instagram Reel posted by Petitioner on or about January 11, 2025, available at: www.instagram.com/reel/DEsg0oFSIYo/?igsh=NTc4MTIwNjQ2YQ%3D%3D
 This video depicts the front of Petitioner's home and a fallen tree, garnering approximately 1.1 million views.
- 3. **TikTok Video** posted by Petitioner on or about July 11, 2024, available at: www.tiktok.com/t/ZT6JM96xD/

In this video, Petitioner is seen jogging and promoting tequila in front of his home, with approximately 385,500 views.

Mr. Lopez brings this Petition not out of genuine fear, but in pursuit of a quick and sensationalized media headline, one designed to falsely portray Respondent as suffering from a "mental health disorder" and to strategically reframe himself as a victim in the wake of the defamation lawsuit filed against him. The proper venue for raising such allegations, if they had any merit, would have been through a counterclaim in the pending civil litigation and not by misusing the court's restraining order process. That Petitioner has thus far declined to bring any counterclaims speaks volumes: he appears to recognize that he cannot prevail on defamation or related claims, especially given the flimsy, out-of-context comments and social media posts he now cites as evidence of "harassment" or fear. This Petition is a transparent attempt to chill protected speech and retaliate against Respondent's ongoing legal claims.

III. Argument

A. The Anti-SLAPP Statute, § 425.16, Applies to this Proceeding

This Court should strike Lopez's Petition under California's anti-SLAPP statute (Cal. Code Civ. Proc., § 425.16), which applies to § 527.6 civil harassment petitions—except for purely interim TROs—as well as to other civil actions. Courts have consistently held that anti-SLAPP protections extend to speech-based restraining order petitions. (See *Huntingdon Life Scis., Inc. v. Stop Huntingdon Animal Cruelty USA, Inc.* (2005) 129 Cal.App.4th 1228, 1239; *Thomas v. Quintero* (2005) 126 Cal.App.4th 635, 641–642.) Most recently, in *Luo v. Volokh* (2024) 102 Cal.App.5th 1312, 1321; 322 Cal.Rptr.3d 323, the Court of Appeal affirmed the dismissal of a § 527.6 harassment petition through an anti-SLAPP motion, holding that such petitions cannot be weaponized to suppress constitutionally protected commentary on matters of public concern.

Under § 425.16,

- (b)(1) A cause of action against a person arising from any act of that person in furtherance of the person's right of . . . free speech under the United States Constitution . . . in connection with a public issue shall be subject to a special motion to strike, unless the court determines that the plaintiff has established that there is a probability that the plaintiff will prevail on the claim.
- (e) ... "[A]ct in furtherance of a person's right of ... free speech under the United States ... Constitution in connection with a public issue" includes: (1) any ... statement or writing made before a legislative, executive, or judicial proceeding, or any other official proceeding authorized by law, (2) any ... statement or writing made in connection with an issue under consideration or review by a legislative, executive, or judicial body, or any other official proceeding authorized by law, (3) any ... statement or writing made in

a place open to the public or a public forum in connection with an issue of public interest, or (4) any other conduct in furtherance of the exercise of . . . the constitutional right of free speech in connection with a public issue or an issue of public interest.

Section 425.16 calls for "a two-step process for determining whether an action is a SLAPP" (*Navellier v. Sletten* (2002) 29 Cal.4th 82, 88), and thus whether the action must be struck:

- 1. *First step:* "First, the court decides whether the defendant has made a threshold showing that the challenged cause of action is one arising from protected activity. 'A defendant meets this burden by demonstrating that the act underlying the plaintiffs cause fits one of the categories spelled out in section 425.16, subdivision (e)." (*Id.* (citation omitted)).
- 2. **Second step:** "If the court finds that such a showing has been made, it must then determine whether the plaintiff has demonstrated a probability of prevailing on the claim." (*Id.*)

"[P]laintiffs' burden as to the second prong of the anti-SLAPP test is akin to that of a party opposing a motion for summary judgment." *Navellier v. Sletten* (2003) 106 Cal. App. 4th 763, 768. "In opposing an anti-SLAPP motion, the plaintiff cannot rely on the allegations of the complaint, but must produce evidence that would be admissible at trial." (*HMS Capital, Inc. v. Lawyers Title Co.* (2004) 118 Cal.App.4th 204, 212.)

Townsend's social media commentary, the allegations raised in her defamation lawsuit, and the video evidence of the lawful service of process fall squarely within the scope of Code of Civil Procedure § 425.16 under the first step, because they constitute "act[s]" "in furtherance of" Townsend's "right of . . . free speech," under three separate clauses:

- a. They are "writing[s] made in connection with an issue under consideration or review by a legislative, executive, or judicial body" (§ 425.16(e)(2)).
- b. They are "writing[s] made in a place open to the public or a public forum in connection with an issue of public interest" (§ 425.16(e)(3)).
- c. They are "conduct in furtherance of the exercise of . . . the constitutional right of free speech in connection with a public issue or an issue of public interest" (§ 425.16(e)(4)).

Because Townsend's defamation lawsuit, the lawful service of process and video evidence in connection with that lawsuit, and her related public commentary are all constitutionally protected, and are not covered by § 527.6, Lopez cannot meet his burden at step two of demonstrating "a probability

that [he] will prevail on the claim" (§ 425.16(b)(1)).

B. <u>Step One: Townsend's Commentary, Defamation Lawsuit, & Related Litigation Activity</u> <u>are Presumptively Protected Under § 425.16</u>

California "courts have repeatedly held that reports of judicial proceedings," including those shared on websites or social media platforms, "are an exercise of free speech within the meaning of section 425.16." (*Traditional Cat Assn., Inc. v. Gilbreath* (2004) 118 Cal.App.4th 392, 397.) This protection applies to commentary made "in connection with an issue under consideration or review by a legislative, executive, or judicial body" (§ 425.16(e)(2)).

As such, Townsend's social media commentary concerning her defamation lawsuit against Petitioner Mario Lopez—including her discussion of the lawsuit's underlying allegations and longstanding criticisms of Petitioner's public behavior widely circulated online for years—falls squarely within the ambit of § 425.16. Courts have made clear that:

- A social media post reporting on "statements made during deposition or . . . at [a] custody trial" is covered by § 425.16 (Sipple v. Found. for Nat. Progress (1999) 71 Cal.App.4th 226, 238).
- Commentary addressing ongoing legal and executive disputes are protected where they are "clearly united by dependence on or relation to the official executive, legislative, and judicial actions they described." (*Lafayette Morehouse, Inc. v. Chron. Publ'g Co.* (1995) 37 Cal.App.4th 855, 863, superseded by statute on other grounds, Damon v. Ocean Hills Journalism Club (2000) 85 Cal.App.4th 468, 478.)
- Even commentary on executive investigations has been found protected under § 425.16. (Braun v. Chron. Publ'g Co. (1997) 52 Cal.App.4th 1036, 1047 [cited approvingly in Briggs v. Eden Council for Hope & Opportunity (1999) 19 Cal.4th 1106, 1116-17].)

In fact, the Court of Appeal recently reaffirmed in *Luo v. Volokh* (2024) 102 Cal.App.5th 1312, 1321, that commentary surrounding litigation, including controversial or critical speech, is constitutionally protected and subject to anti-SLAPP protections. There, the court affirmed dismissal of a § 527.6 petition via anti-SLAPP motion, reiterating that the statute may not be used to censor lawful speech merely because it is unwelcome or unflattering to the petitioner.

And once a defendant shows that the cause of action arises from such "writing[s] made in connection with an issue under" governmental consideration, there is no need for a plaintiff to satisfy "any separate 'public issue' requirement." (*Briggs*, *supra*, 19 Cal.4th at 1113.)

Likewise, Townsend's legal commentary and public posts—including analysis of the lawsuit *Townsend v. Mario Lopez*, Los Angeles Superior Court Case No. 25NNCV04089—are "in connection with an issue under consideration or review by a . . . judicial body," within the meaning of § 425.16(e)(2). Her coverage of this litigation, including commentary on the underlying facts, documentation of procedural milestones such as the service of process, and video evidence capturing that service, squarely concerns a pending judicial matter. As such, her public analysis and discussion remain protected speech while the matter is actively "under consideration or review" by the Los Angeles Superior Court.

Townsend's posts to social media platforms are also covered by § 425.16(e)(3). They were posted on "Web sites accessible to the public," which "are 'public forums' for purposes of the anti-SLAPP statute" (*Barrett v. Rosenthal* (2006) 40 Cal.4th 33, 41, fn. 4; *see also Nygard, Inc. v. Uusi-Kerttula* (2008) 159 Cal.App.4th 1027, 1038 [holding that magazines are "public forums" for purposes of the statute as well]). And they are "in connection with a public issue," because it concerns the conduct of a high-profile civil defamation lawsuit and broader questions about access to justice, celebrity privilege, and misuse of legal process—topics at the core of public discourse about the integrity of the civil justice system.

Finally, Townsend's speech falls squarely within the protection of § 425.16(e)(4), as it constitutes "conduct in furtherance of the exercise of . . . the constitutional right of free speech in connection with a public issue or an issue of public interest." Her commentary, both on social media and within the pleadings of her defamation lawsuit against Mario Lopez, directly addresses matters of societal concern: the retaliatory use of legal process by public figures, longstanding public allegations surrounding Mr. Lopez, and the weaponization of PR smear campaigns by the wealthy to silence criticism and whistleblower speech. As part of that public discourse, Townsend naturally references the individuals and conduct at issue, just as any journalist or legal commentator would cite named parties when analyzing active litigation. That inclusion does not convert protected speech into harassment;

rather, it underscores that her expression is precisely the type of public-interest communication the anti-SLAPP statute was designed to protect.

C. Step Two: Lopez Cannot "establish []" "a probability that [he] will prevail on the claim"

Townsend has thus satisfied her first-step burden of showing that her statements and legal filings are presumptively protected by § 425.16; and Lopez cannot meet his second-step burden of demonstrating a probability of prevailing on his claims.

1. Townsend's social media commentary and litigation coverage are protected by the First Amendment and therefore cannot be enjoined or serve as the basis for a § 527.6 injunction

Townsend's social media posts and defamation lawsuit against Petitioner Mario Lopez constitute protected speech under Code of Civil Procedure § 425.16, as they involve commentary on matters of public concern—including abuse of legal process, celebrity misconduct, and broader systemic issues in the entertainment and judicial systems. These communications are directly tied to ongoing litigation—

Townsend v. Lopez, LASC Case No. 25NNCV04089—and aim to inform the public about the nature and progress of that suit. In Luo v. Volokh (2024) 102 Cal.App.5th 1312, 1321, the Court of Appeal affirmed the trial court's denial of a civil harassment petition, noting that the alleged harmful conduct was "likely protected free speech." The court also concluded that the alleged facts did not constitute "acts of violence, threats of violence, or a course of conduct that seriously alarmed, annoyed, or harassed the petitioner and caused substantial emotional distress."

Townsend's social media postings discuss matters of public concern, including commentary on public record information and allegations raised in the ongoing litigation with Petitioner, and are therefore protected by the First Amendment. "[T]he States may not impose sanctions on the publication of truthful information contained in official court records open to public inspection." (*Gates v. Discovery Commc'ns, Inc.* (2004) 34 Cal.4th 679, 688 (quoting *Cox Broadcasting Corp. v. Cohn* (1975) 420 U.S. 469, 495.) This extends to rape victims' names, when they appear in government-provided documents. (*Florida Star v. B.J.F.* (1989) 491 U.S. 524, 526.)

In *Luo v. Volokh*, the Court of Appeal rejected a nearly identical attempt to reframe protected legal commentary as harassment, emphasizing that "there was no evidence that Volokh stalked Luo,

made harassing phone calls, or sent her harassing correspondence." Instead, Volokh's writings "served a legitimate purpose—a discussion on how a litigant's use of a pseudonym could affect open access to court proceedings and impede investigations into a litigant's credibility." The court concluded that the petitioner's "failure to cite to any evidence that Volokh harassed her within the meaning of section 527.6 is fatal to her argument that she demonstrated her restraining order petition has minimal merit." (*Id.* at p. 1321.) The same logic applies here: Townsend's one-time service of process video evidence, procedural conduct, and public litigation commentary serve legitimate purposes and fall far short of the threshold for unlawful harassment under California law. While *Luo v. Volokh* involved a non-party's commentary on litigation, the protections for litigation-related speech are even more compelling when exercised by an actual party to the case. Townsend's speech concerns her own legal claims and proceedings, making the constitutional protections all the more robust, not less.

Furthermore, Petitioner's handwritten assertion that "she is obsessed with him" clearly reflects a personal grievance or emotional discomfort and not a legal claim (Petition att. 4). Courts have repeatedly emphasized that injunctive relief under Code of Civil Procedure § 527.6 is designed solely to prevent future unlawful conduct, not to punish individuals for past speech or perceived fixation. As the Court of Appeal made clear in *Luo v. Volokh* (2024) 102 Cal.App.5th 1312, 1323, "injunctive relief under section 527.6 is designed to 'prevent threatened future harm' and 'is not intended to punish the restrained party for past acts of harassment." (*Id.*, quoting *Olson v. Doe* (2021) 12 Cal.5th 669, 673, 678.) Even if Petitioner sincerely believes that Townsend is "obsessed," that subjective characterization is not a substitute for objective evidence of unlawful harassment. Townsend's conduct, including her lawsuit and litigation-related speech, is constitutionally protected and aimed at redressing past defamation, not at threatening future harm.

To be sure, speech that tends to cause illegal conduct can indeed be punished if it fits within the narrow exception for "incitement" (*Bill, supra*, at 1006-07; *McCollum, supra*, at 1000). But that requires a showing that the speech constituted "advocacy of the use of force or of law violation" and was "directed to inciting or producing imminent lawless action" and was "likely to incite or produce such action." (*Brandenburg v. Ohio* (1969) 395 U.S. 444, 447; *NAACP v. Claiborne Hardware Co.* (1982) 458 U.S. 886, 927-28 [applying *Brandenburg* as a limit on civil liability, where it was alleged that some

listeners criminally attacked people who had been denounced in speech distributed by the NAACP].)

Townsend's social media commentary and litigation-related posts did not advocate lawless action; they were not directed to producing such action; and they were certainly not intended or likely to produce imminent lawless action. Petitioner merely speculates that Townsend's public discussion of her lawsuit or references to the parties involved somehow placed him or his family at risk. But speculation alone is not sufficient to meet the strict constitutional threshold for incitement. There is no evidence that any member of the public was incited to engage in unlawful behavior as a result of Townsend's commentary. As established in *Brandenburg v. Ohio* and reaffirmed in *NAACP v. Claiborne Hardware Co.*, speech concerning public matters—particularly litigation—is protected under the First Amendment, even if it includes an unflattering portrayal of those being discussed.

2. <u>Townsend's evidence video documenting lawful process service outside</u> <u>Petitioner's home does not strip her speech of First Amendment protection</u>

Petitioner's assertion that Townsend "accompan[ied] a process server to [his] home and post[ed] footage of [his] residence online" does not establish harassment under California law. Lawful service of process is a constitutionally and statutorily protected component of litigation and is explicitly shielded from liability under the litigation privilege, Civil Code § 47(b). The act of documenting a one-time, non-violent, and non-intrusive legal event—conducted without trespass, threats, or crude language on the part of Townsend—cannot be transformed into actionable harassment simply because it was made public or because Petitioner found it unflattering.

The video cited by Petitioner, in which he audibly refers to Townsend as a "crazy fucking bitch," underscores that any emotional intensity during the interaction originated from him and not from her. In fact, the video itself is affirmatively protective of Respondent, as it clearly demonstrates that no threats, aggressive behavior, or unlawful conduct occurred on her part. There is no credible threat of violence shown in the footage, only a routine, lawful service of process met with Petitioner's disproportionate reaction. California courts have consistently held that constitutionally protected activity, including speech and litigation conduct, cannot serve as the basis for a civil harassment order. As the Court of Appeal recently reaffirmed in *Luo v. Volokh* (2024) 102 Cal.App.5th 1312, 1321 [322 Cal.Rptr.3d 323].

Petitioner's claim that the process serving incident disrupted a family celebration and caused

visible distress to his children is contradicted by his own actions and public conduct. Petitioner himself has repeatedly posted videos of the exterior of his residence on social media (see p. 5 above), voluntarily exposing his home to public view and thereby undermining any claim of heightened privacy or danger resulting from Respondent's brief documentation of a lawful legal act. Contrary to his assertion that "Respondent did not merely arrange for lawful service—she stood at the gate of my home while her process server confronted me in front of my children," the publicly available video provided to *Radar Online* shows Petitioner, not the process server or Respondent, escalating the encounter by aggressively slamming the gate on the process server, locking out his own son in the process.

The video is available at: https://radaronline.com/p/mario-lopez-served-court-papers-defamation-lawsuit-flu-shot-cheerleader-video/. Petitioner Lopez cannot overcome Respondent Townsend's First Amendment rights through vague or manufactured claims of "privacy." Townsend's evidence video documenting service of process outside Petitioner's residence—footage that shows only publicly visible exteriors and contains no private intrusion—cannot serve as a basis for restraint. This is especially true where Petitioner himself has voluntarily posted images of his home across his own public social media platforms and where the address has already appeared in publicly filed court records in his separate lawsuit: *Mario Lopez, et al. vs. Grandway Construction, LLC*, et al., LASC Case No. 23STCV30154.

As the California Supreme Court held in *Gates v. Discovery Communications, Inc.* (2004) 34 Cal.4th 679, 696: "An invasion of privacy claim based on allegations of harm caused by a media defendant's publication of facts obtained from public official records of a criminal proceeding is barred by the First Amendment." This protection is not limited to institutional press. Courts have repeatedly emphasized that the First Amendment "equally protects media and nonmedia speakers." (*Bartnicki v. Vopper* (2001) 532 U.S. 514, 525 n.8; *Miller v. Nestande* (1987) 192 Cal.App.3d 191, 200 n.7; *Obsidian Finance Group, LLC v. Cox* (9th Cir. 2014) 740 F.3d 1284, 1291 ["a First Amendment distinction between the institutional press and other speakers is unworkable"]). Thus, as a nontraditional, but nonetheless protected speaker engaged in lawful commentary on ongoing litigation and public matters, Townsend's speech cannot be enjoined merely because it is inconvenient or unflattering to Petitioner.

Petitioner's discomfort with being served at his residence, or with public scrutiny of that

moment, does not override Townsend's legal rights to document and comment on judicial proceedings involving her own claims. Public dissemination of court-related activity—even when critical or uncomfortable for the subject—remains protected under both the First Amendment and California's anti-SLAPP statute.

Petitioner clearly cannot overcome Townsend's First Amendment protections by invoking generalized claims of "privacy." "[A]n invasion of privacy claim based on allegations of harm caused by a media defendant's publication of facts obtained from public official records of a criminal proceeding is barred by the First Amendment." (*Gates v. Discovery Communications, Inc.* (2004) 34 Cal.4th 679, 696.) Although Townsend is not a media defendant, she is a party to the underlying litigation and retains the same constitutional right to speak publicly about her own case. As a litigant, Townsend is entitled to publicly document and discuss the legal proceedings in which she is directly involved, and doing so cannot constitute unlawful harassment.

If Petitioner "witnessed [his] kids become visibly frightened and confused," as claimed, the cause appears to be his own reactive conduct—not Respondent's. Process serving is a necessary and constitutionally protected aspect of litigation. Petitioner's attempt to reframe a routine legal procedure as harassment is not only unavailable under Civil Code § 47(b), which shields all communications and acts made in connection with judicial proceedings, but is also legally insufficient under Code of Civil Procedure § 527.6. The statute requires a course of conduct that is unlawful and not protected by the Constitution; a single instance of lawful process service, accompanied by Petitioner's own disproportionate response, does not meet that threshold. The First Amendment does not permit the issuance of a harassment injunction merely because the lawful act of serving court documents elicited an emotional reaction from the recipient, and that reaction happened to be unflattering when seen by the public.

3. Townsend's social media commentary and litigation coverage are not "harassment" under § 527.6

Petitioner Lopez has no likelihood of succeeding on his § 527.6 claim, and thus cannot satisfy his second-step burden under § 425.16, because Townsend's social media commentary and litigation-related speech are categorically protected by the First Amendment. Lopez also cannot meet his burden

because Townsend's commentary is categorically excluded from the statutory definition of "harassment" under § 527.6(b) (emphasis added):

- (1) "Course of conduct" is a pattern of conduct composed of a series of acts over a period of time, however short, evidencing a *continuity of purpose* *Constitutionally protected activity is not included within the meaning of "course of conduct."*
- (3) "Harassment" is unlawful violence, a credible threat of violence, or a knowing and willful course of conduct *directed at* a specific person that seriously alarms, annoys, or harasses the person, and that *serves no legitimate purpose*. The course of conduct must be that which would cause a *reasonable person* to suffer substantial emotional distress, and must actually cause substantial emotional distress to the petitioner.

This is so for four reasons:

- 1. Constitutionally protected activity is not included within the meaning of "course of conduct." Section 527.6(b)(1) expressly provides that "[c]onstitutionally protected activity is not included within the meaning of 'course of conduct." Townsend's speech—including social media posts discussing her own defamation case, public statements about litigation updates, and commentary on the legal conduct of a public figure—is protected under both state and federal constitutional principles. As such, it cannot serve as the basis for a finding of unlawful harassment.
- 2. Petitioner and did not include any "credible threat of violence." The commentary in question focused on matters of public concern and litigation involving a public figure. Statements referencing Petitioner were made in the context of discussing legal claims arising out of publicly filed court documents and proceedings. They were not part of a targeted or personalized campaign of harassment; they were part of ongoing legal discourse in which Townsend, as the plaintiff, has every right to participate. At no point did Townsend's speech contain any language, conduct, or implication that could reasonably be construed as a credible threat of violence. Petitioner's attempt to recharacterize lawful and nonthreatening public commentary as harassment under § 527.6 fails both as a matter of law and constitutional protection.
- 3. The speech served a "legitimate purpose." Townsend's public commentary served the legitimate purpose of informing the public about her pending defamation lawsuit and addressing broader concerns about media misconduct and celebrity influence. The speech at issue falls well

within the bounds of protected commentary about judicial proceedings and public figures, both of which are recognized as legitimate purposes under the statute and prevailing case law.

4. Townsend's conduct would not cause a reasonable person to suffer substantial emotional distress. Nothing in the record supports a finding that Townsend's litigation-related speech would cause a reasonable person to suffer substantial emotional distress, as required under § 527.6(b)(3). Even if Petitioner subjectively found the commentary upsetting or unflattering, courts require more than mere annoyance or reputational discomfort. The statute demands conduct that is both objectively distressing and unjustified. There is no "clear and convincing evidence" (§ 527.6(i)) of any coordinated or repeated campaign directed at Petitioner that would meet this threshold. Petitioner's own public visibility, his pattern of engaging with the media, and his voluntary exposure of his personal life online further diminish any claim that Townsend's commentary was extreme, threatening, or outside the bounds of lawful discourse.

4. <u>Lopez's petition seeks an unconstitutional prior restraint</u>

Even aside from the fact that Townsend's social media commentary and litigation-related speech are protected under § 425.16, Lopez's requested relief further underscores the constitutional infirmity of his position. His petition effectively seeks a judicial order barring Townsend from discussing public facts, court proceedings, and her own lawsuit, a remedy that would amount to an impermissible prior restraint on speech. In his petition, Lopez asks the Court to prohibit Townsend from (Petition att. 8c):

 Orders enjoining Respondent from posting, reposting, commenting on, or otherwise publishing any statements about me or my family -directly or indirectly-on any public platform, including but not limited to. TikTok. Reddit, Instagram, Twitter (now known as X). LinkedIn, and any blog, podcast, or website under her control or influence;

Such restrictions would bar Townsend from engaging in constitutionally protected commentary about a matter in which she is a direct participant. It would prevent her from publicly discussing her own legal claims, her experience with the litigation process, and Petitioner's conduct—all of which are issues of public interest and concern. If granted, this would mean that Townsend could not even share or quote publicly filed documents in her own defamation case, respond to public misstatements, or engage with press coverage involving the parties. It would also bar her from discussing updates in that

case, including any future court rulings, trial proceedings, or appellate decisions—effectively gagging her from discussing the very lawsuit that Petitioner himself made the subject of his restraining order petition.

Such a sweeping restraint would clearly violate the First Amendment. As the U.S. Supreme Court has held, "prior restraints on speech and publication are the most serious and the least tolerable infringement on First Amendment rights." (*Nebraska Press Assn. v. Stuart* (1976) 427 U.S. 539, 559.) Petitioner's request for judicial censorship of litigation speech is not only unsupported by law, it is constitutionally prohibited.

California law recognizes that overbroad injunctions are unconstitutional even in cases alleging "harassment." (*See, e.g., Evans v. Evans* (2008) 162 Cal.App.4th 1157, 1164, 1169 [holding that "the court's preliminary injunction prohibiting [defendant] Linda from publishing any 'false and defamatory' statements on the Internet is constitutionally invalid," even when the court's rationale was a finding of "ongoing harassment activities" by defendant; "[b]ecause there has been no trial and no determination on the merits that any statement made by Linda was defamatory, the court cannot prohibit her from making statements characterized only as 'false and defamatory'"). And while California courts have allowed injunctions after a trial at which the enjoined speech has been found to be constitutionally unprotected—"once a court has found that a specific pattern of speech is unlawful, an injunctive order prohibiting the repetition, perpetuation, or continuation of that practice is not a prohibited 'prior restraint' of speech" (*Aguilar v. Avis Rent A Car Sys., Inc* (1999) 21 Cal.4th 121, 140)—for the reasons given, there can be nothing "unlawful" about reporting on the contents of public records.

RESPONSE TO § 527.6 PETITION

- 1. For the reasons given in Part III.C, Lopez cannot prevail on his § 527.6 claim.
- 2. Even if this Court decides to issue a restraining order against Townsend, that order cannot, consistently with the Second Amendment, prohibit Townsend from possessing or acquiring guns. "[T]he Second and Fourteenth Amendments protect an individual right to keep and bear arms for self-defense." New York State Rifle & Pistol Ass'n, Inc. v. Bruen (2022) 142 S.Ct. 2111, 2125. Based on text, history, and tradition, this right may be denied to "felons," id. at 2162 (Kavanaugh, J., concurring) (cleaned up); and courts have also allowed firearms restrictions on people who are subject to harassment orders that

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"reflect[] a real threat or danger of injury to the protected party by the party enjoined" may be consistent with the Second Amendment, *United States v. Luedtke* (E.D.Wis. 2008) 589 F.Supp.2d 1018, 1024 (quoting *United States v. Emerson* (5th Cir. 2001) 270 F.3d 203, 262). Here, there is no evidence that Townsend has ever posed a credible threat of violence. Even if the Court were to conclude that some of Townsend's social media posts, litigation commentary, or conduct surrounding process service were improper, none of it rises to the level of a threat that would justify depriving her of a constitutional right to armed self-defense.

Conclusion

A Harassment Restraining Order cannot constitutionally, or consistently with § 527.6, be based on social media commentary and legal analysis that merely report or discuss information from judicial records. Under § 425.16, Townsend is entitled to have Lopez's Petition struck. Alternatively, the Court should deny Lopez's Petition based on the facts and authorities set forth above.

Furthermore, Petitioner Mario Lopez and his attorney have actively engaged with Respondent Townsend's social media posts related to the coverage of this matter, clearly demonstrating that they do not fear Respondent. (See Exhibit A.) Their ongoing engagement with Respondent's online commentary, including posts they claim are harassing, demonstrates that they were not in fact alarmed, threatened, or distressed in the way described in the petition.

Rather, this engagement supports my belief that Petitioner filed the instant petition as a retaliatory measure to suppress public commentary on a matter of public interest. Instead, this behavior supports my belief that the petition was brought in bad faith, for the improper purpose of suppressing constitutionally protected speech on a matter of public concern. Respondent respectfully asks the Court to consider sanctions under Code of Civil Procedure § 425.16(c) for filing a frivolous and retaliatory petition intended to chill constitutionally protected activity.

Dated: August 1, 2025

(1) Word (1) -

Respectfully Submitted,

Desiree Townsend

Pro se

Declaration of Desiree Townsend

- I, Desiree Townsend, declare as follows:
- 1. I am a litigation and intellectual property paralegal that provides legal commentary on civil litigation, legal ethics, and the misuse of the legal system by wealthy individuals. I actively advocate for increased access to affordable legal services and support reforms aimed at expanding meaningful participation in the legal system by non-attorneys.
- 2. I regularly share educational and legal analysis content online, including discussions related to high-profile defamation matters involving public figures such as Petitioner Mario Lopez.
- 3. My commentary includes insights related to my own legal proceedings, including a defamation lawsuit filed against Petitioner Lopez, in which I detail serious allegations concerning his conduct and the media dissemination of defamatory narratives.
- 4. Attached hereto as Exhibit A are true and correct copies of publicly available social media interactions on TikTok by Petitioner and his attorney, Alexandra Kazarian, on Respondent's account, @cheerleader4change, which reflect their active engagement with content related to this matter. Exhibit A further includes screenshots of a TikTok account under the handle @Walking_backwards, believed to have been created by an individual who subsequently admitted to working with Petitioner and his attorney.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on August 1, 2025 in Los Angeles, California.

Desiree Townse

EXHIBIT A





Activity



Alexandra Kazarian liked your video. 6m





blueemoon54 reposted your video. 14m





blueemoon54 liked your video. 14m





Antonio 🎾 🚅 🛂 👼 and hazeyeyedazn liked your video.





countrygalAnnie liked your video.





Tracie liked your video. 36m





Armando Macias 482 added your video to Favorites. 50m





emilija liked your video. 1h





DJ liked your video. 1h







bridgetamichels liked your video.







Activity



one even saw it or cared until you made it a big deal 1h









Davie Dave commented: 🙈 🙈











Others



Alexandra Kazarian liked your video. 12m





Michael liked your video.







Timothy Redman, grubwithdeedub and 2 others liked your video. 1h





Niki Zytion liked your video. 1h

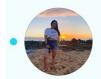






ElGeoTowing777LV and Petpolishers liked your video. 1h





Minerva Rose Go added your video to Favorites. 2h





JohnnyBlaze24 commented: Dude don't you understand everyone is looking for money anyway they can and you dont think she trying to scam? Even if



12:38 ••• 5G+ **Activity** oreosss liked your video. 2h **☆*.** ∴ **♦Arely ♦**∴. *☆ commented: Keyword: I. Meaning you, correct? Just because you enjoy something it doesn't mean every women enjoys it 2h Q Reply ♥ Like 💫 Ana 🐆 liked your video. 2h mario viked your video. 2h mario added your video to Favorites. 2h Ruyon liked your photos. 2h liz, Joel's RemodelingLLC and moni added your video to Favorites. 3h

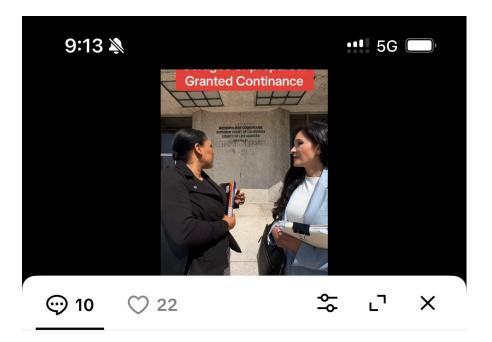


HollywoodPatriot liked a video you reposted. 511

Rojaz liked 2 posts. 3h









Desirée Townsend · Creator

Only "news" reporting on this case. Mario Lopez's attorneys unprepared for court. 22h





user258619102844

Mario Lopez is shameful! He's full of himself!

21h Reply









Peter V

Keep up your fight Desiree!!!

First comment

22h Reply









NewsRGV

The continuance is to inflict costs and emotional distress

















Replying to Walking_bac...









••• 5G



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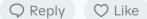
Activity

Priority



Walking_backwards commented: She has zero idea what she's doing. Mario paid 50k alone, just for the retainer fee 4m







Walking_backwards commented: Judge that knows the law and knows the truth 5m







Walking_backwards commented: FACTS 6m





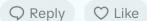




L. Oribio commented on your post. You now have 10 comments. 10m







Others



got2b_amy and Melly liked your video. 8m





user9688146204403, Poppops1960 and 4 others liked your video. 9m





Milada liked your video.



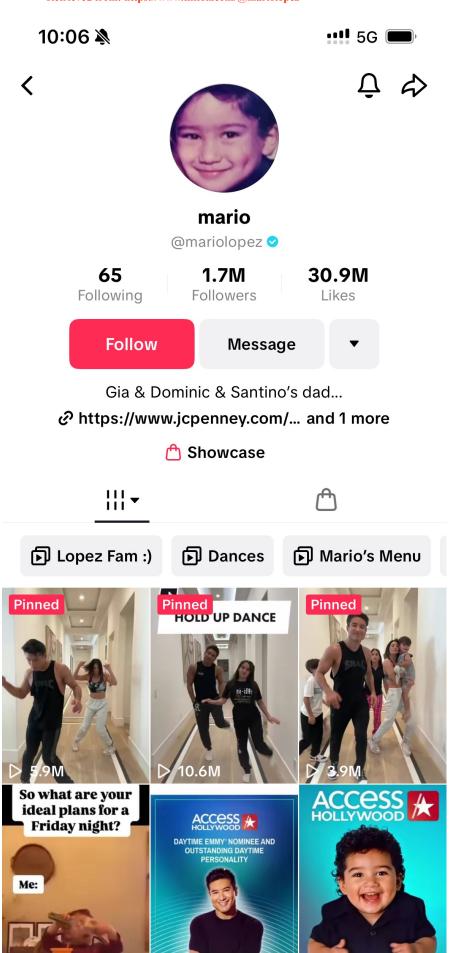














Retrieved from: https://www.tiktok.com/@akincontempt

Alexandra Kazarian







@akincontempt

275

117.5K

1.7M

Following

Followers

Likes

Follow

Message

Instagram: @akincontempt

213-290-2478 Criminal defense and civil trial attorney

@instagram.com/akincontempt





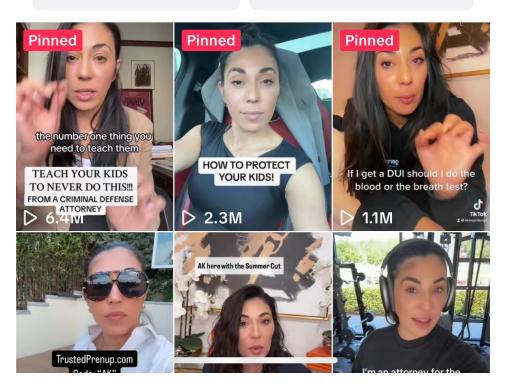


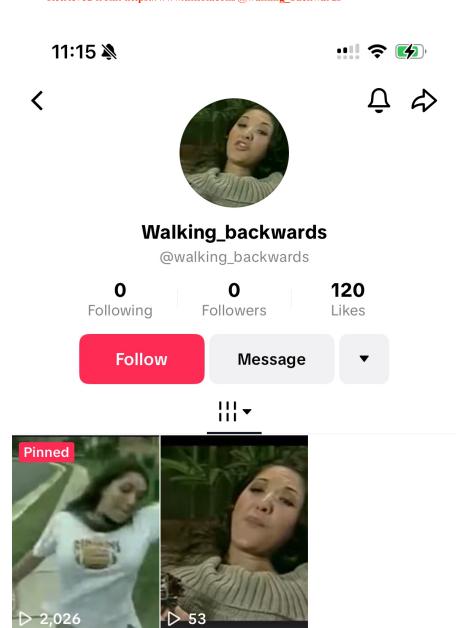




DUI Dos and Don'ts

Protect Your Children







July 13, 2025









Activity 🔻

Priority



Walking_backwards commented:









Others



ValenciaJewelryWatchBattery... liked your video. Just now





rusty9678 liked your video. 3m





rusty9678 added your video to Favorites. 3m





Familia Molina commented: 💞







Q Reply ♥ Like

7 💞 7m



Alma G. Schwartz lic#01356726 liked your video. 7m





Jeanette liked your video. 21m





Brandi Woolsey-Scott liked your video. 30m





Luis Ángel commented: Sexual harassment and racism

37m



