

CH-100**Request for Civil Harassment Restraining Orders**

Clerk stamps date here when form is filed.

Read Can a Civil Harassment Restraining Order Help Me? (form CH-100-INFO) before completing this form. Also fill out Confidential CLETS Information (form CLETS-001) with as much information as you know.

1 Person Seeking Protection

a. Your Full Name:

Mario LopezAge: 51

Your Lawyer (if you have one for this case)

Name: Alexandra KazarianState Bar No.: 244494Firm Name: GERAGOS & GERAGOS

b. Your Address (If you have a lawyer, give your lawyer's information. If you do not have a lawyer and want to keep your home address private, you may give a different mailing address instead. You do not have to give telephone, fax, or e-mail.)

Address: 644 S. Figueroa St.City: Los Angeles State: CA Zip: 90017Telephone: 213-625-3900 Fax: (Petitioner did not provide)E-Mail Address: GERAGOS@GERAGOS.COM

FILED
Superior Court of California
County of Los Angeles

JUN 20 2025

David W. Slayton, Executive Officer/Clerk of Court
By: M. Kocharyan, Deputy

Fill in court name and street address:

Superior Court of California, County of

Los Angeles Superior Court
Northwest District - East Courthouse
6230 Sylmar Avenue
Van Nuys, CA 91401

Court fills in case number when form is filed.

Case Number:

25STR003858**2 Person From Whom Protection Is Sought**Full Name: Desiree TownsendAge: 45Address (if known): 2901 Ocean Park Blvd. Suite 201City: Santa Monica State: CA Zip: 90405**3 Additional Protected Persons**a. Are you asking for protection for any other family or household members? ☒ Yes ☐ No If yes, list them:

Full Name	Sex	Age	Lives with you?	How are they related to you?
<u>Courtney Lopez</u>	<u>Female</u>	<u>42</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<u>Spouse</u>
<u>Gia Lopez</u>	<u>Female</u>	<u>14</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<u>Child</u>
<u>Dominic Lopez</u>	<u>Male</u>	<u>11</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<u>Child</u>
<u>Santino Lopez</u>	<u>Male</u>	<u>5</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<u>Child</u>

☒ Check here if there are more persons. Attach a sheet of paper and write "Attachment 3a—Additional Protected Persons" for a title. You may use form MC-025, Attachment.

b. Why do these people need protection? (Explain below):

☐ Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 3b—Why Others Need Protection" for a title.

because Ms. Townsend has repeatedly involved and exposed Mr. Lopez's family, including his minor children, in her campaign of harassment—culminating in her accompanying a process server to their home and posting footage of their residence online. Her conduct has caused fear, distress, and an ongoing threat to their safety and privacy.

This is not a Court Order.

4 Relationship of Parties

How do you know the person in (2)? (Explain below):

☐ Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 4—Relationship of Parties" for a title.

Mr. Lopez has never met nor had any contact with Desiree Townsend. In addition to

5 Venue online harassment. He's a public figure and she is obsessed with him.

Why are you filing in this county? (Check all that apply):

- a. ☒ The person in (2) lives in this county.
b. ☒ I was harassed by the person in (2) in this county.
c. ☐ Other (specify): _____

6 Other Court Cases

a. Have you or any of the persons named in (3) been involved in another court case with the person in (2)?

☒ Yes ☐ No (If yes, check each kind of case and indicate where and when each was filed.)

Kind of Case	Filed in (County/State)	Year Filed	Case Number (if known)
(1) <input type="checkbox"/> Civil Harassment	_____	_____	_____
(2) <input type="checkbox"/> Domestic Violence	_____	_____	_____
(3) <input type="checkbox"/> Divorce, Nullity, Legal Separation	_____	_____	_____
(4) <input type="checkbox"/> Paternity, Parentage, Child Custody	_____	_____	_____
(5) <input type="checkbox"/> Elder or Dependent Adult Abuse	_____	_____	_____
(6) <input type="checkbox"/> Eviction	_____	_____	_____
(7) <input type="checkbox"/> Guardianship	_____	_____	_____
(8) <input type="checkbox"/> Workplace Violence	_____	_____	_____
(9) <input type="checkbox"/> Small Claims	_____	_____	_____
(10) <input type="checkbox"/> Criminal	_____	_____	_____
(11) <input checked="" type="checkbox"/> Other (specify): <u>Civil</u>	<u>Los Angeles, CA</u>	<u>2025</u>	<u>25NNCV04089</u>

b. Are there now any protective or restraining orders in effect relating to you or any of the persons in (3) and the person in (2)? ☒ No ☐ Yes (If yes, attach a copy if you have one.)

7 Description of Harassment

Harassment means violence or threats of violence against you, or a course of conduct that seriously alarmed, annoyed, or harassed you and caused you substantial emotional distress. A course of conduct is more than one act.

a. Tell the court about the last time the person in (2) harassed you.

- (1) When did it happen? (provide date or estimated date): 6/15/2025 and continuing daily
(2) Who else was there?
Mr. Lopez's three children.

This is not a Court Order.



7 a. (3) How did the person in (2) harass you? (Explain below):

☒ Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 7a(3)—Describe Harassment" for a title.

(4) Did the person in (2) use or threaten to use a gun or any other weapon?

☐ Yes ☒ No (If yes, explain below):

☐ Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 7a(4)—Use of Weapons" for a title.

(5) Were you harmed or injured because of the harassment?

☒ Yes ☐ No (If yes, explain below):

☐ Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 7a(5)—Harm or Injury" for a title.

Mr. Lopez was harmed by the most recent harassment when Ms. Townsend arrived at his home on Father's Day with a process server, causing chaos and fear for his young children and family members who witnessed the event. She then escalated the harm by posting a video of the service on TikTok, exposing his family and home address to millions of viewers, placing them at risk of further harassment, public ridicule, and potential physical danger.

(6) Did the police come? ☐ Yes ☒ No

If yes, did they give you or the person in (2) an Emergency Protective Order? ☐ Yes ☐ No

If yes, the order protects (check all that apply):

☐ Me ☐ The person in (2) ☐ The persons in (3).

(Attach a copy of the order if you have one.)

b. Has the person in (2) harassed you at other times?

☒ Yes ☐ No (If yes, describe prior incidents and provide dates of harassment below):

☒ Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 7b—Previous Harassment" for a title.

This is not a Court Order.



Check the orders you want. ☒

8 ☒ Personal Conduct Orders

I ask the court to order the person in (2) not to do any of the following things to me or to any person to be protected listed in (3):

- a. ☒ Harass, intimidate, molest, attack, strike, stalk, threaten, assault (sexually or otherwise), hit, abuse, destroy personal property of, or disturb the peace of the person.
- b. ☒ Contact the person, either directly or indirectly, in any way, including, but not limited to, in person, by telephone, in writing, by public or private mail, by interoffice mail, by e-mail, by text message, by fax, or by other electronic means.
- c. ☒ Other (specify):

☐ Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 8c—Other Personal Conduct Orders," for a title.

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.

The person in (2) will be ordered not to take any action to get the addresses or locations of any protected person unless the court finds good cause not to make the order.

9 ☒ Stay-Away Orders

a. I ask the court to order the person in (2) to stay at least 100 yards away from (check all that apply):

- (1) ☒ Me. (8) ☒ My vehicle.
- (2) ☒ The other persons listed in (3). (9) ☐ Other (specify):
- (3) ☒ My home.
- (4) ☒ My job or workplace.
- (5) ☒ My school.
- (6) ☒ My children's school.
- (7) ☒ My children's place of child care.

b. If the court orders the person in (2) to stay away from all the places listed above, will he or she still be able to get to his or her home, school, or job? ☒ Yes ☐ No (If no, explain below):

☐ Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 9b—Stay-Away Orders," for a title.

10 ☒ Firearms (Guns), Firearm Parts, and Ammunition

Does the person in (2) own or possess any firearms (guns), firearm parts, or ammunition? This includes firearm receivers and frames, and any item that may be used as or easily turned into a receiver or frame (see Penal Code section 16531). ☐ Yes ☐ No ☒ I don't know

If the judge grants a protective order, the person in (2) will be prohibited from owning, possessing, purchasing, receiving, or attempting to purchase or receive firearms (guns), firearm parts, and ammunition while the protective order is in effect. The person in (2) will also be ordered to turn in to law enforcement, or sell to or store with a licensed gun dealer, any firearms (guns) and firearm parts within their immediate possession or control. If an order is granted, the person in (2) will also be prohibited from owning, possessing, or buying body armor and would have to relinquish any they have.

This is not a Court Order.

11 ☒ **Temporary Restraining Order**

I request that a Temporary Restraining Order (TRO) be issued against the person in (2) to last until the hearing. I am presenting form CH-110, *Temporary Restraining Order*, for the court's signature together with this *Request*.

Has the person in (2) been told that you were going to go to court to seek a TRO against him/her?

☐ Yes ☒ No (If you answered no, explain why below):

☐ Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 11—Temporary Restraining Order" for a title.

Notice should not be required because Ms. Townsend has already demonstrated a willingness to escalate her harassment in response to perceived legal action, including confronting Mr. Lopez at his private residence and broadcasting the event online. Providing advance notice of the TRO request risks triggering further retaliation, endangering Mr. Lopez, his family, and their privacy, and undermining the very protection.

12 ☒ **Request to Give Less Than Five Days' Notice of Hearing**

You must have your papers personally served on the person in (2) at least five days before the hearing, unless the court orders a shorter time for service. (Form CH-200-INFO explains What Is "Proof of Personal Service"? Form CH-200, Proof of Personal Service, may be used to show the court that the papers have been served.)

If you want there to be fewer than five days between service and the hearing, explain why below:

☐ Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 12—Request to Give Less Than Five Days' Notice" for a title.
I need more time to locate Desiree Townsend.

13 ☒ **No Fee for Filing or Service**

- a. ☒ There should be no filing fee because the person in (2) has used or threatened to use violence against me, has stalked me, or has acted or spoken in some other way that makes me reasonably fear violence.
- b. ☒ The sheriff or marshal should serve (notify) the person in (2) about the orders for free because my request for orders is based on unlawful violence, a credible threat of violence, or stalking.
- c. ☐ There should be no filing fee and the sheriff or marshal should serve the person in (2) for free because I am entitled to a fee waiver. (You must complete and file form FW-001, Application for Waiver of Court Fees and Costs.)

14 ☒ **Lawyer's Fees and Costs**

I ask the court to order payment of my ☒ lawyer's fees ☒ Court costs.

The amounts requested are:

Item	Amount	Item	Amount
Attorney's Fees	\$ TBD		\$
	\$		\$
	\$		\$

☐ Check here if there are more items. Put the items and amounts on the attached sheet of paper or form MC-025 and write "Attachment 14—Lawyer's Fees and Costs" for a title.

This is not a Court Order.



15 ☒ **Possession and Protection of Animals**

I ask the court to order the following:

- ☒ That I be given the sole possession, care, and control of the animals listed below, which I own, possess, lease, keep, or hold, or which reside in my household.

(Identify animals by, e.g., type, breed, name, color, sex.)

French Bulldog, Oscar De La Hoya Lopez (brindle)French Bulldog, Sanchez Lopez (Merle)French Bulldog, Betts Lopez (white with brown spot)

I request sole possession of the animals because (specify good cause for granting order):

- ☐ Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 15a—Possession of Animals" for a title.

Ms. Townsend has demonstrated a pattern of erratic and retaliatory behavior, including targeting Mr. Lopez's family and home, creating a credible concern that she may escalate her harassment to include harm or distress to the family's pets as a means of intimidation or emotional manipulation. Protecting the animals is necessary to ensure the full safety and emotional well-being of the household.

- ☒ That the person in (2) must stay at least 100 yards away from, and not take, sell, transfer, encumber, conceal, molest, attack, strike, threaten, harm, or otherwise dispose of, the animals listed above.

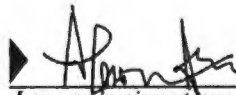
16 ☐ **Additional Orders Requested**

I ask the court to make the following additional orders (specify):

- ☐ Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 16—Additional Orders Requested," for a title.

17 Number of pages attached to this form, if any: 44Date: JUNE 19, 2025Alexandra Kazarian

Lawyer's name (if any)


Lawyer's signature

I declare under penalty of perjury under the laws of the State of California that the information above and on all attachments is true and correct.

Date: 06/19/2025Mario Lopez

Type or print your name


Sign your name

This is not a Court Order.

SHORT TITLE:
Mario Lopez vs. Desiree Townsend

25STR003858

(This Attachment may be used with any Judicial Council form.)

<u>Full Name</u>	<u>Sex</u>	<u>Age</u>	<u>Lives with you?</u>	<u>How are they related to you?</u>
<u>Elaine Mazza</u>	<u>Female</u>	<u>76</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<u>Parent</u>
<u>Frances Pons</u>	<u>Female</u>	<u>71</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<u>Aunt</u>
<u> </u>	<u> </u>	<u> </u>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<u> </u>

Attachment 7a(3)—Describe Harassment

I. INTRODUCTION

Petitioner Mario Lopez seeks a Civil Harassment Restraining Order pursuant to California Code of Civil Procedure section 527.6. Respondent Desiree Townsend has engaged in a knowing and willful course of conduct that includes defamatory online attacks, cyber harassment, reputational damage, and public exposure of Petitioner's private information. These actions have caused Petitioner to fear for his safety and that of his family. Because Respondent's conduct is not constitutionally protected speech and serves no legitimate purpose, injunctive relief is appropriate and legally supported.

II. LEGAL STANDARD

California Code of Civil Procedure § 527.6 permits a person who has suffered harassment to seek injunctive relief. Harassment is defined as:

- 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 serves no legitimate purpose.

(C.C.P. § 527.6(b)(3).)

"Course of conduct" includes harassing correspondence by any means, including internet and social media communications. (C.C.P. § 527.6(b)(1).)

III. ONLINE DEFAMATION AND CYBER HARASSMENT
QUALIFY AS HARASSMENT UNDER § 527.6

California courts have expressly recognized that speech constituting harassment under § 527.6 is not protected by the First Amendment. In *E.G. v. M.L.*, the court upheld a civil harassment restraining order where the respondent engaged in online defamation that was adjudicated to be false and aimed at discrediting the petitioner through repetition of baseless accusations. 105 Cal. App. 5th

1 688, 704 (2024). The court held such speech was not constitutionally protected and affirmed that
2 substantial evidence supported a finding of harassment for no legitimate purpose. *Id.*

3 Likewise, in *Luo v. Volokh*, the court acknowledged the potential for online exposure of
4 private details to cause significant fear, reputational damage, and emotional distress—even where
5 the conduct falls short of a physical threat. 102 Cal. App. 5th 1312, 1323 (2024).

6 Here, Respondent Townsend has published false, inflammatory, and defamatory statements
7 about Petitioner and his family across social media platforms, in connection with a broader online
8 smear campaign that also included viral video reposts, TikTok commentary, and Reddit threads.
9 These posts have no legitimate purpose and are calculated to inflict reputational and emotional harm.

10
11 IV. CIVIL HARASSMENT RESTRAINING ORDERS DO NOT VIOLATE THE FIRST
12 AMENDMENT WHEN THEY ADDRESS UNLAWFUL SPEECH

13 It is well-established that civil harassment restraining orders do not constitute
14 unconstitutional prior restraints where the speech in question has been judicially determined to be
15 unprotected. In *Huntingdon Life Sciences, Inc. v. Stop Huntingdon Animal Cruelty USA, Inc.*, the
16 court affirmed the issuance of an injunction against speech that rose to the level of harassment. 129
17 Cal. App. 4th 1228, 158-59 (2005).

18 In *R.D. v. P.M.*, the court upheld a restraining order that limited harassing conduct without
19 unduly impairing protected speech. 202 Cal.App.4th 181, 190-91 (2011).

20 Moreover, *Parisi v. Mazzaferro* holds that an injunction prohibiting repetition of speech
21 found to be unlawful does not amount to a prohibited prior restraint. 5 Cal.App.5th 1219, 1228-29
22 (2016).

23 Thus, courts have recognized that even online expression may be curtailed when it amounts
24 to harassment. *See also* *In re Marriage of Evilsizor & Sweeney*, 237 Cal.App.4th 1416, 1425-26
25 (2015), upholding an order prohibiting dissemination of private information following a finding of
26 abuse.

27 V. THE FACTS HERE WARRANT INJUNCTIVE RELIEF
28

a. *All Harassing Social Media Posts are authored by Desiree Townsend*

The harassing social media posts attached to this request were authored by Desiree Guerriere Townsend, as confirmed by multiple overlapping identifiers across platforms and her own admissions.

1. Direct Name Usage and Public Identity:

On LinkedIn, all posts about the lawsuits against Paramount and Mario Lopez were published under the verified account of "Desirée Guerrière Townsend" (LinkedIn profile) Townsend social media. These posts explicitly refer to the lawsuits she filed and reference her personal medical history, matching the allegations in the complaint served on Mr. Lopez.

2. Consistent Handle Across Platforms:

The TikTok and Twitter posts targeting Mr. Lopez and referencing the lawsuits were published under the handle @cheerleader4change and @cheering4change, which are consistent with the branding Townsend publicly claims (referencing her prior nickname, the "Flu Shot Cheerleader"). Many of these posts include video and photo content of her and her legal filings, further confirming authorship.

3. Admission of Identity on Reddit:

On Reddit, Townsend commented under the username "FunctionTiny1302" and directly stated, "Yes, it's me... Desiree here (formerly Jennings)," in response to someone identifying her. In the same thread, she confirmed details about her lawsuit against Mr. Lopez and referenced harassment she believes is coming from his PR team—further linking her to both the Reddit and other social media content.

4. Cross-referencing of Content and Lawsuit:

The social media posts cite and preview exact claims, timelines, and screenshots from Townsend's publicly filed complaint against Mr. Lopez (LASC Case No. 25NNCV04089). For example, the June 16, 2025 TikTok post showing Mr. Lopez being served is captioned by @cheerleader4change with references to the legal action and her lawsuit timeline. These are

1 matters only known to Townsend and match the content of the filed complaint,
2 demonstrating she is the source.

3
4 In summary, Desiree Townsend has used her real name and confirmed social media handles
5 across platforms to promote and amplify the same false, inflammatory, and harassing content about
6 Mr. Lopez that she included in her civil lawsuit. There is no question that she is the originator of the
7 materials described and attached to this CHRO.

8 b. *Course of Conduct: Online Harassment and Delusional Allegations Involving Mario Lopez*

9
10 Beginning in early 2025, and escalating rapidly in the months leading up to this filing, Ms.
11 Desiree Guerriere Townsend has engaged in a pattern of obsessive and delusional conduct across
12 social media platforms—including TikTok, Reddit, Twitter, and LinkedIn—directly targeting Mario
13 Lopez and falsely accusing him of participating in a grand conspiracy with Paramount Global, CBS,
14 and other media organizations to defame, discredit, and suppress her. These posts reflect not just
15 harassment, but the kind of detached-from-reality fixation that creates a credible threat.

16
17 On March 23, 2025, Townsend tweeted from her account that she was “getting ahead of a
18 disgusting media push Mario Lopez is planning against me,” and that she would be filing a
19 defamation suit once she collected “defamatory statements” from his alleged PR team on Reddit.
20 She then posted “two can play at this game fuckface @mariolopezviva,” followed by “how’s your
21 new vagina bitch?”—language that is both aggressive and deeply unhinged .


22
23 By March 24, 2025, Townsend escalated to accusing Mr. Lopez of rape, tweeting, “no one
24 seems disturbed that @mariolopezviva was accused in the 90s of raping teenage girls.”

25
26 On April 2, 2025, she published a video titled “How I will prove Mario Lopez defamed me,”
27 in which she continued her baseless campaign of personal attacks on Mr. Lopez and his family .
28

1 On May 31, 2025, she posted a TikTok with the caption, "Lawsuit #3 drops Father's Day.
2 Mario Lopez, consider this your early gift. #LitigationShark." That same day, she mocked Mr.
3 Lopez's religious Instagram post, stating: "God's plan won't save you from the consequences,
4 Mario. God's soldier wears heels, files lawsuits and never misses her marks".

5
6 By June 6, 2025, she posted another TikTok taunting: "Let's see if you guys can cover up my
7 lawsuit next week against actor Mario Lopez too. Summons and conformed Complaint coming
8 soon..." . On June 7, she appeared to post three separate TikToks filmed on the NBCUniversal lot
9 using their WiFi, while publicly claiming she was using company resources to sue "NBC's Mario
10 Lopez." She stated that her \$10 million lawsuit would go to "Women in Media" and declared herself
11 "Hollywood's Destroyer".

12
13 On June 8, she solicited help from the public, offering to pay "\$50/hour" to "serve Mario
14 Lopez" in Los Angeles. This offer was made publicly via TikTok and raised real fears that she was
15 mobilizing third parties to physically approach Mr. Lopez and his family .

16
17 On June 14, she wrote that her "Mario Lawsuit  " would "expose Paramount Next
18 Week," and bizarrely blamed Mr. Lopez for causing problems at a shareholder meeting, calling him
19 "Mario 'Tippy-toes' Lopez" . The next day, she published: "Townsend v. Lopez et al. POV Karma:
20 when Mario Lopez orchestrates a smear campaign against you and instantly gets it returned to
21 sender" .

22 On June 16, she posted video of Mr. Lopez being served on Father's Day, captioned with
23 triumphal and mocking language. She followed this with several TikTok videos claiming he had
24 defamed her and "cost [her] jobs," falsely alleging that his Instagram still contains defamatory
25 content. In these comments, she claims he "used [her] for fame," "chased clout," and "cost [her]
26 income" .

1 Simultaneously, on Reddit, using the account "FunctionTiny1302," Townsend posted dozens
2 of vile and delusional accusations over a period of three months. These included:

- 3 • Claims that Mr. Lopez had to pay women for sex, committed "date rape" in
4 the 1990s, and is friends with sex trafficker Andrew Tate
- 5 • That he had plastic surgery to feminize his appearance, including "vaginal
6 rejuvenation" due to "roast beef" allegedly visible in gym shorts
- 7 • That he orchestrated a coordinated "astroturfing smear campaign" against her
8 via Reddit and that his PR team is behind anonymous Reddit accounts attacking her
9 credibility
- 10 • A statement that watching his film performance in The Journey: Absolution
11 inspired her to "shave and bleach [her] buttohole" to get into Hollywood

12 She has called Mr. Lopez a "serial rapist," "grapist," "clown," and "D-list has-been" across
13 multiple platforms and comment threads. In her LinkedIn posts, she accuses him of being part of a
14 corporate conspiracy to suppress news of her lawsuit and influence insider trading at Paramount and
15 CBS.

16
17 These are not random, single incidents. This is a deliberate, ongoing, and malicious
18 campaign of targeted harassment fueled by conspiracy, rage, and what appears to be a mental health
19 disorder. Mr. Lopez reasonably fears that Ms. Townsend's delusions may escalate into physical
20 danger for himself or his family.

21
22 He has never met or interacted with Ms. Townsend in any personal capacity. Her obsession
23 with him, and with fabricating a narrative that casts him as a perpetrator in some vast media
24 conspiracy, is both defamatory and deeply frightening. The need for a restraining order is urgent and
25 obvious.

26 c. *Delusional and Conspiratorial Allegations in Civil Filing*
27 *Demonstrate a Threatening Pattern of Behavior*
28

1 Ms. Townsend's civil complaint against Mr. Lopez, filed on June 13, 2025 in Los Angeles
2 Superior Court (Case No. 25NNCV04089), is not a typical defamation suit. It is a document filled
3 with inflammatory, baseless, and paranoid conspiracy theories that reveal the extent of her
4 delusional fixation on Mr. Lopez and his family. The content of this complaint, which has been
5 publicly posted and shared across her social media platforms, demonstrates the need for immediate
6 protection.

7
8 Among the disturbing allegations contained in her 37-page complaint:

9 • She accuses Mr. Lopez of "manipulating Instagram's algorithm" to
10 suppress her and punish her for confronting him, stating that he deliberately used her as
11 "algorithmic fuel" to recover from visibility penalties following a paid advertisement. This
12 demonstrates a profound detachment from reality and a belief that Mr. Lopez controls or
13 weaponizes complex tech infrastructure for the sole purpose of targeting her.

14 • She alleges a wide-ranging media and public relations conspiracy,
15 involving not just Mr. Lopez, but also NBCUniversal, Paramount Global, CBS, and unnamed
16 "crisis PR teams," whom she claims collaborated to launch a "coordinated smear campaign"
17 against her across multiple social platforms including TikTok and RedditMario.

18 • She refers to Mr. Lopez's social media posts as "psychological
19 warfare" and repeatedly compares his actions to those of Harvey Weinstein, asserting that
20 he follows a "reputation management playbook" designed to silence dissent and suppress
21 women.

22 • She expresses a belief that Mr. Lopez orchestrated anonymous Reddit
23 campaigns against her, based on posts from a user named "Top-Strategy-1261," who she
24 theorizes is either Mr. Lopez or someone hired by him. She identifies this anonymous
25 criticism as part of a broader "tactical defamation network" aimed at destabilizing her mental
26 health and silencing her voice.

1 • **She invokes themes of retaliation and industry-wide corruption, framing**
2 herself as the lone truth-teller in a system designed to protect predators, concluding with a
3 statement that this lawsuit is "just the beginning" of a larger effort to dismantle power
4 structures in Hollywood.

5 This type of language and worldview is not only unhinged—it is threatening. Ms. Townsend
6 has demonstrated:

- 7
- 8 • A repeated willingness to publicly accuse Mr. Lopez of heinous crimes
 - 9 without evidence;
 - 10 • A fixation on imagined surveillance, manipulation, and retaliation;
 - 11 • An obsessive focus on Mr. Lopez's family and home life, including filming
 - 12 and broadcasting video of her lawsuit service at his private residence on Father's Day in front
 - 13 of his young children;
 - 14 • An escalating pattern of grievance and revenge-seeking behavior.
- 15

16 Mr. Lopez and his family are reasonably afraid that Ms. Townsend's detachment from reality
17 and public threats of "exposure" will escalate into physical confrontations or further psychological
18 terror. The content of her own complaint confirms she believes she is in a personal battle against Mr.
19 Lopez, not simply a litigant in a civil case.

20 These documented conspiratorial beliefs, especially her perception that Mr. Lopez is
21 omnipresent in her online life and reputation, show the type of mental state that courts have previously
22 found to justify restraining orders under Code of Civil Procedure § 527.6. Her actions and statements
23 are not constitutionally protected expression; they are targeted harassment and intimidation that serve
24 no legitimate purpose.

25

26 At the time of this filing, Ms. Townsend continues to publish new TikTok videos in which she
27 aggressively and delusionally accuses Mr. Lopez of crimes and misconduct that are entirely baseless.
28 Despite being served with a civil harassment complaint and having full knowledge that her posts are

1 being used as evidence of harassment, she has not relented—instead, she has escalated her campaign.
2 Her recent posts include renewed false claims that Mr. Lopez is under investigation, that he
3 orchestrated a “smear operation” funded by Paramount, and that he is using media connections to
4 silence her. These videos continue to feature dramatic and conspiratorial language, unverified
5 accusations, and statements that suggest she believes she is in an ongoing war with Mr. Lopez and
6 powerful media institutions. Her refusal to stop, despite pending legal proceedings, underscores her
7 instability and makes clear that the harassment is ongoing, deliberate, and dangerous.

8
9 This conduct mirrors that in *E.G. v. M.L.*, where the respondent’s repetition of harmful, false
10 content on social media was sufficient for injunctive relief. Petitioner respectfully requests the Court
11 enjoin Respondent from engaging in further defamatory or harassing speech targeting him or his
12 family.

13 VI. CONCLUSION

14
15 Respondent’s conduct constitutes a knowing and willful course of harassment under
16 California Code of Civil Procedure § 527.6. Because her actions are not constitutionally protected
17 and have resulted in severe reputational and emotional harm, Petitioner respectfully requests that the
18 Court issue a Civil Harassment Restraining Order enjoining Respondent from:

- 19 • Posting or disseminating further defamatory or harassing statements about
20 Petitioner or his family online or offline;
21 • Approaching Petitioner or his family in person;
22 • Engaging in any further acts of harassment.

23 For all the foregoing reasons, Petitioner respectfully requests that the Court grant all forms of
24 relief authorized under California Code of Civil Procedure § 527.6, including but not limited to: a
25 temporary restraining order and injunction prohibiting Respondent Desiree Guerriere Townsend from
26 harassing, contacting, or approaching Petitioner Mario Lopez, his spouse, his children, his home, his
27 workplace, or any location where he is present. Petitioner further requests that the Court issue an order
28

1 enjoining Respondent from making, posting, or republishing any content on the internet—including
2 but not limited to TikTok, Reddit, Twitter (X), Instagram, LinkedIn, or any other platform—
3 concerning or referring to Mr. Lopez or his family, either directly or indirectly. Given the ongoing,
4 escalating, and delusional nature of her conduct, such an order is necessary to protect Mr. Lopez and
5 his family from further psychological harm, reputational damage, and the credible threat of future
6 escalation.

**DECLARATION OF COURTNEY LOPEZ IN SUPPORT OF REQUEST FOR CIVIL
HARASSMENT RESTRAINING ORDER (C.C.P. § 527.6)**

I, Courtney Lopez, declare:

1. I am an individual residing in Los Angeles County, California, and the wife of Mario Lopez. I submit this declaration in support of a request for a Civil Harassment Restraining Order against Desiree Guerriere Townsend, pursuant to California Code of Civil Procedure § 527.6.
2. Unless otherwise stated, the facts in this declaration are based on my personal knowledge. Where I lack direct knowledge, the information is stated on information and belief and I believe it to be true.
3. On Sunday, June 16, 2025—Father's Day—Ms. Townsend accompanied a process server to our family home to serve my husband with a civil lawsuit (LASC Case No. 25NNCV04089). My husband and our small children were present when this occurred.
4. The process server approached our home gate and attempted to serve my husband in front of our children. Ms. Townsend stood nearby, observing the service. Our children were frightened and confused. What should have been a joyful, private family moment turned into a deeply upsetting and chaotic scene.
5. Almost immediately after the service, Ms. Townsend posted a video online documenting the event. The video, which she published to her public TikTok account, shows identifiable features of our home and describes the service in inflammatory terms. This video has since gone viral and continues to be shared online, exposing our family's location and private life to millions of strangers.
6. Since that day, I have lived in a constant state of anxiety. I worry about our children's safety and well-being. We have had to take additional security measures and restrict

1 where and how our children can play outside our home. I no longer feel safe at my
2 own residence.

3
4 7. Ms. Townsend's actions did not stop with that video. Over the past several months,
5 she has published numerous false and deeply disturbing statements about my husband
6 online. These include false accusations of sexual misconduct, claims that he is
7 dangerous, and attacks on his reputation and character. In doing so, she has targeted
8 not only him, but by extension, our entire family.

9
10 8. I believe Ms. Townsend's conduct is escalating. Her decision to physically show up at
11 our home, publish our location, and use that moment for public humiliation
12 demonstrates a complete disregard for our safety, privacy, and peace of mind. Her
13 online behavior has been obsessive and aggressive, and I fear she may return or
14 attempt further acts of intimidation.

15
16 9. I respectfully request that the Court issue a Civil Harassment Restraining Order to
17 protect my family and me. Specifically, I ask that Ms. Townsend be:

- 18 ○ Prohibited from contacting me, my husband, or our children, directly or
19 indirectly;
- 20 ○ Prohibited from coming within 100 yards of our home, workplace, or
21 children's school;
- 22 ○ Prohibited from filming, recording, or photographing any member of our
23 family or our residence;
- 24 ○ Ordered to refrain from publishing, reposting, or distributing any defamatory,
25 harassing, or inflammatory statements about our family online, including but
26 not limited to TikTok, Instagram, Reddit, and YouTube.

27 10. I never imagined that simply being married to someone in the public eye would
28 subject our children to this kind of fear and exposure. Ms. Townsend's conduct has

1 crossed every reasonable line. Her campaign of harassment has left me feeling unsafe,
2 exposed, and desperate for relief. I ask the Court to protect my family from further
3 harm.

4 I declare under penalty of perjury under the laws of the State of California that the foregoing
5 is true and correct.
6
7

8 Executed this 19th day of June, 2025, at Los Angeles, California.
9

10
11 /s/ Courtney Lopez

12 COURTNEY LOPEZ

13 Declarant
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**DECLARATION OF MARIO LOPEZ IN SUPPORT OF REQUEST FOR CIVIL
HARASSMENT RESTRAINING ORDER (C.C.P. § 527.6)**

I, Mario Lopez, declare:

1. I am an individual residing in Los Angeles County, California. I make this declaration in support of my request for a Civil Harassment Restraining Order against Desiree Guerriere Townsend, pursuant to California Code of Civil Procedure § 527.6.
2. Unless otherwise stated, the facts in this declaration are based on my personal knowledge. Where I lack direct knowledge, the information is stated on information and belief and I believe it to be true.
3. On Father's Day, June 16, 2025, Respondent personally accompanied a process server to my private residence to serve me with a civil lawsuit (LASC Case No. 25NNCV04089). I was at home with my young children at the time. The deliberate timing and method of service, in front of my children on a meaningful family holiday, caused significant emotional disruption, fear, and distress.
4. 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. I witnessed our kids become visibly frightened and confused, and the entire incident disrupted what should have been a peaceful family celebration.
5. Shortly thereafter, Respondent published a video on her public TikTok account showing footage from the service of process at my home. The video includes visual references to the exterior of my residence, making its location publicly identifiable. That video has since circulated widely, exposing my home and my family to millions of online viewers.
6. I am deeply concerned for the safety of my wife and children. Respondent's decision to publicize my private residence, and to weaponize the service of process for internet

1 content, has jeopardized our security. I have had to increase residential security and
2 limit my children's outdoor activities as a direct result.

- 3 7. This is not the first instance of harassment by Respondent. She has repeatedly made
4 false, inflammatory, and defamatory statements about me online, including
5 accusations of serious criminal conduct and personal attacks against my character.
6 These statements have gone viral, and the emotional toll on my family and me has
7 been significant.
- 8 8. I fear that Respondent will continue to escalate her conduct unless the Court
9 intervenes. Her obsessive pattern of behavior—spanning direct confrontations, public
10 accusations, viral videos, and now showing up at my home—reflects an intent not just
11 to litigate, but to humiliate, endanger, and provoke.
- 12 9. I respectfully request that the Court issue a Civil Harassment Restraining Order that
13 includes the following relief:
- 14 ○ Prohibiting Respondent from contacting me, my wife, or our children directly
15 or indirectly;
 - 16 ○ Prohibiting Respondent from coming within 100 yards of my home,
17 workplace, or my children's school;
 - 18 ○ Prohibiting Respondent from filming, recording, or photographing me, my
19 family, or our residence;
 - 20 ○ Enjoining Respondent from posting or republishing any defamatory, harassing,
21 or inflammatory statements or content about me or my family on any online
22 platform, including but not limited to TikTok, Instagram, Reddit, and
23 YouTube.
- 24 10. I do not seek this relief lightly. I respect the rights of all people to speak freely and to
25 seek legal remedies through proper channels. However, Respondent's conduct has far
26 exceeded lawful boundaries. Her actions have created genuine fear and caused my
27 family to live in a state of distress and hyper-vigilance. This Court's protection is
28 essential to restoring our sense of safety.

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

Executed this 19th day of June, 2025, at Los Angeles, California.

/s/ Mario Lopez

MARIO LOPEZ

Declarant

Attachment 7b—Previous Harassment

Beginning in early 2025, and escalating rapidly in the months leading up to this filing, Ms. Desiree Guerriere Townsend has engaged in a pattern of obsessive and delusional conduct across social media platforms—including TikTok, Reddit, Twitter, and LinkedIn—directly targeting Mario Lopez and falsely accusing him of participating in a grand conspiracy with Paramount Global, CBS, and other media organizations to defame, discredit, and suppress her. These posts reflect not just harassment, but the kind of detached-from-reality fixation that creates a credible threat.

On March 23, 2025, Townsend tweeted from her account that she was “getting ahead of a disgusting media push Mario Lopez is planning against me,” and that she would be filing a defamation suit once she collected “defamatory statements” from his alleged PR team on Reddit. She then posted “two can play at this game fuckface @mariolopezviva,” followed by “how’s your new vagina bitch?”—language that is both aggressive and deeply unhinged .

By March 24, 2025, Townsend escalated to accusing Mr. Lopez of rape, tweeting, “no one seems disturbed that @mariolopezviva was accused in the 90s of raping teenage girls.”


On April 2, 2025, she published a video titled “How I will prove Mario Lopez defamed me,” in which she continued her baseless campaign of personal attacks on Mr. Lopez and his family .

On May 31, 2025, she posted a TikTok with the caption, “Lawsuit #3 drops Father’s Day. Mario Lopez, consider this your early gift. #LitigationShark.” That same day, she

mocked Mr. Lopez's religious Instagram post, stating: "God's plan won't save you from the consequences, Mario. God's soldier wears heels, files lawsuits and never misses her marks" .

By June 6, 2025, she posted another TikTok taunting: "Let's see if you guys can cover up my lawsuit next week against actor Mario Lopez too. Summons and conformed Complaint coming soon..." . On June 7, she appeared to post three separate TikToks filmed on the NBCUniversal lot using their WiFi, while publicly claiming she was using company resources to sue "NBC's Mario Lopez." She stated that her \$10 million lawsuit would go to "Women in Media" and declared herself "Hollywood's Destroyer" .

On June 8, she solicited help from the public, offering to pay "\$50/hour" to "serve Mario Lopez" in Los Angeles. This offer was made publicly via TikTok and raised real fears that she was mobilizing third parties to physically approach Mr. Lopez and his family .

On June 14, she wrote that her "Mario Lawsuit  " would "expose Paramount Next Week," and bizarrely blamed Mr. Lopez for causing problems at a shareholder meeting, calling him "Mario 'Tippy-toes' Lopez" . The next day, she published: "Townsend v. Lopez et al. POV Karma: when Mario Lopez orchestrates a smear campaign against you and instantly gets it returned to sender" .

On June 16, she posted video of Mr. Lopez being served on Father's Day, captioned with triumphal and mocking language. She followed this with several TikTok videos claiming he had defamed her and "cost [her] jobs," falsely alleging that his Instagram still contains defamatory content. In these comments, she claims he "used [her] for fame," "chased clout," and "cost [her] income" .

Simultaneously, on Reddit, using the account "FunctionTiny1302," Townsend posted dozens of vile and delusional accusations over a period of three months. These included:

- Claims that Mr. Lopez had to pay women for sex, committed "date rape" in the 1990s, and is friends with sex trafficker Andrew Tate
- That he had plastic surgery to feminize his appearance, including "vaginal rejuvenation" due to "roast beef" allegedly visible in gym shorts
- That he orchestrated a coordinated "astroturfing smear campaign" against her via Reddit and that his PR team is behind anonymous Reddit accounts attacking her credibility
- A statement that watching his film performance in The Journey: Absolution inspired her to "shave and bleach [her] buttohole" to get into Hollywood

She has called Mr. Lopez a "serial rapist," "grapist," "clown," and "D-list has-been" across multiple platforms and comment threads . In her LinkedIn posts, she accuses him of being part of a corporate conspiracy to suppress news of her lawsuit and influence insider trading at Paramount and CBS .

SHORT TITLE:

Mario Lopez vs. Desiree Townsend

CASE NUMBER

25STR003858

CH-100 Attachment: Petitioner's List of Exhibits

(This Attachment may be used with any Judicial Council form.)

Exhibits for Most Recent Incident of Harassment

Exhibit #1 Desiree Townsend Social Media Posts - This document is a chronological compilation of Ms. Townsend's public social media posts across multiple platforms in which she repeatedly targets and harasses Mario Lopez and his family, demonstrating a sustained and escalating pattern of defamatory and threatening conduct.

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

TikTok Videos

Date	Time	Description of post	Account handle	Link to Post
3/10/25	Not listed on TikTok	<p>'Pretty girls walk like this' song, Townsend walking to it in Fashion Island Orange County.</p> <p>In the comments she said on 5/23/25: "Frightening update: May 23. It's been almost 3 weeks & no single media outlet is covering this. How is no one covering the "Flu shot Cheerleader" filing \$100 million lawsuit against paramount? This proves the media lies & hides!"</p> <p>5/19 comment: "Inside Edition flat out admitted that they lied in 2010 segment. I have a letter from their defense council admitting this. Their attorneys</p>	@cheerleader4change	TikTok Link 1

		own admission will destroy them in court."		
4/22/25	Not listed on TikTok	Townsend walking towards the camera with caption "walking straight to court... hey CBS/Inside Edition... guess who now heads a law firm's litigation arm?"	@cheerleader4c hange	Link to TikTok 2
4/28/25	Not listed on TikTok	Captioned "CBS retaliates: Instagram deletes all my accounts", describing situation thinks Paramount/CBS went to Meta and had them delete accounts, including her Instagram account with 80 followers and the other with 5.	@cheerleader4c hange	Link to TikTok 3
5/25/25	Not listed on TikTok	Captioned "mass media coverup" describing trading spike about insider trading after her case	@cheerleader4c hange	Link to TikTok 4
5/31/25	Not listed on TikTok	Video of writing lawsuit captioned "lawsuit #3 drops Father's day. Mario Lopez, consider this your early	@cheerleader4c hange	Link to TikTok 5

		gift. #LitigationShark"		
5/31/25	Not listed on TikTok	Slideshow of 3 images: 1st image- Mario Lopez's caption on an Instagram post "We don't understand God's plan but he understands us...#StayPrayedUp" "God's plan won't save you from the consequences, Mario. God's soldier wears heels, files lawsuits and never misses her marks." Next slide- Townsend v. Paramount case, Last slide- Townsend v. Morrissey	@cheerleader4change	Link to TikTok 6
6/6/25	Not listed on TikTok	Captioned "Let's see if you guys can cover up my lawsuit next week against actor Mario Lopez too. Summons and conformed Complaint coming soon..."	@cheerleader4change	Link to TikTok 7
6/7/25	Not listed on TikTok	Captioned "Using NBC Universal's Wifi to Sue Mario Lopez...How's that for Full Circle"	@cheerleader4change	Link to TikTok 8
6/7/25	Not listed on	Captioned	@cheerleader4c	Link to TikTok 9

	TikTok	"Drafting a Lawsuit against NBC's Mario Lopez, while on NBC's lot, using NBC's wifi"	hange	
6/7/25	Not listed on TikTok	Captioned "How to Fix Hollywood... Women in Media lost their funding. My \$10M lawsuit against Mario Lopez? Every \$ will go to them."	@cheerleader4c hange	Link to TikTok 10
6/7/25	Not listed on TikTok	Captioned "Did you miss me? "Flu Shot Cheerleader as Hollywood's Destroyer..."	@cheerleader4c hange	Link to TikTok 11
6/8/25	Not listed on TikTok	Captioned "Los Angeles! Help me serve Mario Lopez. Will pay \$50/hour."	@cheerleader4c hange	Link to TikTok 12
6/11/25	Not listed on TikTok	Captioned "Mario Lopez Defamation Lawsuit: Drop Coming Soon"	@cheerleader4c hange	Link to TikTok 13
6/12/25	Not listed on TikTok	Image of Lopez at Universal Studios, Captioned "Mario Lopez: Dodging lawsuits like its cardio. Filming moved indoors to avoid service. When you're afraid of a 5'2 cheerleader and	@cheerleader4c hange	Link to TikTok 14

		her process server."		
6/12/25	Not listed on TikTok	Captioned "Will Paramount also Cover-up my Lawsuit against Mario? Townsend v. Paramount Global	@cheerleader4c hange	Link to TikTok 15
6/14/25	Not listed on TikTok	Captioned "Mario Lawsuit (bomb emoji) to expose Paramount Next Week... Just in time for the shareholder meeting. Paramount's real problem isn't Trump- it's Mario "Tippy-toes" Lopez".	@cheerleader4c hange	Link to TikTok 16
6/15/25	Not listed on TikTok	Captioned "Townsend v. Lopez et al. POV Karma: when Mario Lopez orchestrates a smear campaign against you and instantly gets it returned to sender..."	@cheerleader4c hange	Link to TikTok 17
6/16/25	Not listed on TikTok	Video of Mario Lopez being served on Father's Day	@cheerleader4c hange	Link to TikTok 18
6/16/25	Not listed on TikTok	Captioned "Why I filed the Lawsuits against Mario Lopez and	@cheerleader4c hange	Link to TikTok 19

		Paramount Global et al."		
6/16/25	Not listed on TikTok	Captioned "Paramount: you're next"	@cheerleader4change	Link to TikTok 20
6/17/25	Not listed on TikTok	Captioned "Why Paramount needs to be Broken Up..."	@cheerleader4change	Link to TikTok 21
6/17/25	12:25 pm	Captioned "Mario Lopez Under Investigation at NBCUniversal"	@cheerleader4change	Link to TikTok 22
6/17/25	6:28 pm	Captioned "Multiple Allegations Against Mario Lopez at NBCUniversal"	@cheerleader4change	Link to TikTok 23

Linkedin Posts

1 month ago- exact date not noted but likely around 5/17/25	Not listed on Linkedin	Paramount Global's earning call information- case number and complaint information included	@Desirée Guerrière Townsend https://www.linkedin.com/in/desiree-townsend/	Linkedin Post 1
4 weeks ago- exact date not noted but likely around 5/20/25	Not listed on Linkedin	Captioned "CBS fired her to cover their asses, meanwhile they are actively squashing stories about my case, allowing privilege individuals who happened on my page to insider	@Desirée Guerrière Townsend	Linkedin Post 2

		trade, and keeping investors in the dark about how bad Paramount's corporate governance and risk mitigation truly is.		
1 month ago- exact date not noted but likely around 5/17/25	Not listed on Linkedin	Townsend's updated draft complaint for defamation against Paramount Global	@Desirée Guerrière Townsend	<u>Linkedin Post 3</u>
3 weeks ago- exact date not noted but likely around 5/27/25	Not listed on Linkedin	Email to Trump Attorney Captioned "Paramount Global, CBS Broadcasting, and their subsidiary Inside Edition Inc. have been actively suppressing news coverage of my \$100 million defamation lawsuit. Why? To keep shareholders in the dark, engage in potential insider trading, and negotiate a lower settlement in President Trump's defamation case, without disclosing the explosive	@Desirée Guerrière Townsend	<u>Linked n Post 4</u>

		<p>litigation they're hiding.</p> <p>So last night... I emailed all of President Trump's attorneys. Read the complaint here https://linktr.ee/defame"</p>		
1 month ago- exact date not noted but likely around 5/17/25	Not listed on LinkedIn	FCC complaint	@Desirée Guerrière Townsend	<u>LinkedIn Post 5</u>
4 months ago	Not listed on LinkedIn	Captioned "It is not an accident they called me the Flu Shot Cheerleader. Time is running out to build a vaccine."	@Desirée Guerrière Townsend	<u>LinkedIn Post 6</u>
1 month ago- exact date not noted but likely around 5/17/25	Not listed on LinkedIn	Emails of proof of deactivation of Instagram accounts captioned "My Instagram accounts taken down a mere hours after corresponding with Inside Edition's legal counsel with my intent to move forward with a defamation lawsuit. Both benign and relatively inactive accounts, one with my platform for running for mayor, deleted at	@Desirée Guerrière Townsend	<u>LinkedIn Post 7</u>

		the same time. "		
4 weeks ago	Not listed on LinkedIn	Lawsuit post stating that no media outlets reported on her lawsuit	@Desirée Guerrière Townsend	<u>LinkedIn Post 8</u>
2 weeks ago	Not listed on LinkedIn	Looking for a litigation paralegal or assistant in Los Angeles to poach for her case	@Desirée Guerrière Townsend	<u>LinkedIn Post 9</u>
1 month ago	Not listed on LinkedIn	Claimed that a CBS attorney labeled her medical records as "talking points" in writing stated that "publicly dismissing medical evidence from a disabled woman isn't just bad optics, it's malpractice in public relations".	@Desirée Guerrière Townsend	<u>LinkedIn Post 10</u>
4 weeks ago	Not listed on LinkedIn	Restated the "talking points" claim and stated "I am willing to bet multiple insiders, sold stock or shorted the company based on this information. This is their undoing. The SEC and DOJ must investigate trades made by insiders in the previous 13	@Desirée Guerrière Townsend	<u>LinkedIn Post 11</u>

		days."		
4 weeks ago	Not listed on Linkedin	<p>Captioned "A \$100 Million Lawsuit You Can Profit Off Of! Since Paramount and CBS are suppressing this news, use it to your advantage to short the stock ahead of shareholders notification of this. This this is a great opportunity for traders to make significant profits ahead of any news coverage of this lawsuit. Typically, this is considered insider trading, but since the media is suppressing this public info, it's yours to profit off of.</p> <p>Disclaimer: This is not financial advice. Please consult with a financial advisor before making any investment decisions."</p>	@Desirée Guerrière Townsend	<u>Linkedin Post 12</u>
2 months ago	Not listed on Linkedin	<p>Captioned "Getting ahead of any disgusting media push Mario Lopez is planning against me to paint me</p>	@Desirée Guerrière Townsend	<u>Linkedin Post 13</u>

		as the villain for calling him out for defaming me. I will be filing a lawsuit against him once I gather all the defamatory statements made by who I think is his PR team on Reddit."		
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Twitter Posts

3/23/25	2:45 pm	Cross tweet from LinkedIn "Getting ahead of any disgusting media push Mario Lopez is planning against me to paint me as the villain for calling him out for defaming me. I will be filing a lawsuit against him once I gather all the defamatory statements made by who I think is his PR team on Reddit: "	@cheering4change	Twitter Link 1
4/2/25	1:18 pm	Video Captioned "How I will prove	@cheering4change	Twitter Link 2

		Mario Lopez defamed me" video attacking his character and family values		
3/24/25	1:46 pm	<p>Captioned "It's amazing that I have to provide my medical records to be believed and when I do, the amount of mental gymnastics conducted to continue to discredit and dismiss me is, well...crazy. I understand @MonicaLewinsky so much now. Yet no one seems disturbed that @mariolopezviva was accused in the 90s of raping teenage girls. @accesshollywood</p>	@cheering4change	<u>Twitter Link 3</u>
6/15/25	2:20 pm	<p>Video of Lopez being served on Father's Day, Captioned "Mario Lopez served my \$10 million defamation lawsuit today by Maria. Any monetary awards from the suit will be donated to</p>	@cheering4change	<u>Twitter Link 4</u>

		Women in Media a charity in Los Angeles. Thank you for your service Maria!"		
3/23/25	6:36 pm	Captioned "Oh GAWD I have no idea why @mariolopezviv a acting career tanked. "For a second I thought it was 9:23, but then I decided, no, no its 9:22" @accesshollywo od You guys should replace this clown with Al." Video of RiffTrax: The Journey: Absolution (preview clip) attached to tweet	@cheering4cha nge	<u>Twitter Link 5</u>
3/23/25	7:12 pm	Captioned "Oh gawd this was brutal to watch, but no wonder Mario Lopez can't get any decent movie gigs, his acting sucks as hard as the locker room scene from The Journey: Absolution. @lifetimetv Loser"	@cheering4cha nge	<u>Twitter Link 6</u>
3/18/25	3:24 pm	"The pyramid of cancel culture protects those at the very top... Until those at the bottom fight	@cheering4cha nge	<u>Twitter Link 7</u>

		back" Images of Mario Lopez, Bill Clinton, James Franco, Jenny McCarthy		
3/23/25	7:13 pm	Captioned "two can play at this game fuck face @mariolopezviva (middle finger emoji) Hey how's your new vagina bitch?"	@cheering4change	Twitter Link 8
6/16/25	8:29 pm	Reply "Except I was living my life as a private individual when he defamed me saying I faked an illness to millions of followers so HE could get clout. Explain to me how defending myself after he cost me jobs and income is chasing fame? I didn't ask him to post about me."	@cheering4change	Twitter Link 9
6/16/25	8:31 am	Reply "He cost me jobs!! That's why I am suing. How can I get a job when he has this defamatory statement still on his Instagram and a Google search by an employer pulls this up?! Wake up dumb ass."	@cheering4change	Twitter Link 10
6/16/25	8:33 am	Reply "He used me for fame and	@cheering4change	Twitter Link 11

		you're angry because I am fighting back?"		
6/15/25	7:59 pm	"No its there..." Images of Court order	@cheering4change	Twitter Link 12

Reddit Posts

Under username: **FunctionTiny1302**

3 months ago	Not listed on reddit	<p>Commented on a video with Mario Lopez acting in a show. "Mario Lopez when he allegedly had to pay women to have sex with him. After this he allegedly resorted to date rape, according to the two women accusers from the 1990s. One of the alleged accusers was a credible witness, but had waited too long to go to the police, thus the DA dropped the charges.</p> <p>Mario Lopez is friends with Andrew Tate too. He was seen hugging Tate at a UFC fight a mere days before Tate</p>	FunctionTiny1302	Reddit Post 1
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		<p>was accused of assaulting Brianna Stern at the Beverly Hills Hotel.</p> <p>Mario pretends to be a real stand up guy. He does Christmas family movies and selfies of him at church on ash Wednesday to make you think he is god fearing, but it's all a facade."</p>		
3 months ago	Not listed on reddit	<p>Another user writes Desiree? She comments "Yes, it's me and whoever Wise_Reception5478 is I am willing to bet he or she is part of Mario Lopez's PR team that has gone on an astroturfing rampage to defame me AGAIN to get ahead of my lawsuit against him."</p>	FunctionTiny1302	<u>Reddit Post 2</u>
3 months ago	Not listed on reddit	<p>Commented "Desiree here (formerly Jennings) no it was not functional neuro disorder, it was actually stiff person syndrome. I have high antibodies</p>	FunctionTiny1302	<u>Reddit Post 3</u>

		<p>to GAD, but no one ran the labs until several years after the fact. At the time this lab was run I was on years of IVIG and it was still showing high. I am speaking out more now because Mario Lopez from Access Hollywood defamed me, then when I called him out about two weeks ago, he started a smear campaign on Reddit (www.reddit.com/user/Top-Strategist-1261/). I am filing a defamation lawsuit against him shortly."</p> <p>Replied to herself "You know what the other messed up part is? In this sick country, I have to show my medical records to be believed and even when I show people these they do extreme mental gymnastics to find ways to discredit and dismiss me. Meanwhile, no one bats an eye to Mario Lopez</p>		
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		being accused of raping two teens in the 90s or hugging accused sex trafficker Andrew Tate."		
3 months ago	Not listed on reddit	<p>In reference to astroturfing Townsend says "It is what Blake Lively did to Justin Baldoni, allegedly. The way Mario Lopez is using it as a smear campaign to discredit me before I file a defamation lawsuit against him. Mario is the one that brought James Franco into this."</p> <p>In reference to her "beef with these guys" she says "Just a friendly competition. They are the Microsoft to my Apple."</p>	FunctionTiny1302	<u>Reddit Post 4</u>
3 months ago	Not listed on reddit	<p>Commented "Mario Lopez is the reason I realized I needed to shave and bleach my butthole. After watching him act in The Journey: Absolution I realized that was the only way I was also going to get into</p>	FunctionTiny1302	<u>Reddit Post 5</u>

		Hollywood."		
3 months ago	Not listed on reddit	On a rate Mario Lopez thread Townsend commented "I give him a 1 maybe a 1.5, sure he might have a symmetrical face, but he is a complete a-hole inside. Ever since his acting career completely bombed after Saved by the Bell, the best he can do is D-list holiday movies, because he has no useful skills other than reading off a teleprompter, which quite frankly AI can do better."	FunctionTiny1302	<u>Reddit Post 6</u>
3 months ago	Not listed on reddit	Comments on post discussing Lopez's take on Britney Spear's father " "Mario is a giant douché bag. He has vagina envy. I heard through the grapevine that he had a vaginal rejuvenation that didn't turn out well, but he had to do it because the roast beef was starting to drag to his kneecap and you	FunctionTiny1302	<u>Reddit Post 7</u>

		could see it coming out his gym shorts. I don't know how true this is, but I believe it!"		
3 months ago	Not listed on reddit	Commented "The court cherry-picked the records. If you actually read over the opinion there were multiple HIGH anti-GAD antibodies but the test was not run until years after the fact, which is why the court said it could not have been the vaccine, because no one thought to run the test in 2009 Mario. Hey I wonder where I can get the investigative report into your rape allegations from 1993, I bet I can get some real interesting details from that you has been D-list actor."	FunctionTiny130 2	<u>Reddit Post 8</u>
3 months ago	Not listed on reddit	Replied "You have no idea the hell I have been through. I have thought about suicide so many times I cannot even count. Including back in June of last year	FunctionTiny130 2	<u>Reddit Post 9</u>

		<p>when I lost business opportunities not know it was because Mario Lopez through his instagram defamed me to millions of followers: https://www.instagram.com/mariolopez/reel/C8Zx0QdpG9c/</p> <p>Then if that was not enough, 3 days later I discovered he had defamed me last year and called him out, he comes on here under Top-Strategy-126 1 to CONTINUE DEFAMING ME is beyond triggering: https://www.instagram.com/mariolopez/reel/C8Zx0QdpG9c/</p>		
3 months ago	Not listed on reddit	<p>Replied "This was me you flaming hot pile of garbage and no I was not faking it. I was a fucking NFL cheerleader why would I want to be known as a crippled?!! Does anyone ever use reasoning? What would my motives have</p>	FunctionTiny1302	<u>Reddit Post 10</u>

		<p>been to walk like a crippled and be made fun of? I mean come on, have you no fucking logic?</p> <p>I am not trying to erase anything, I was clearing the air on what happened to me so people would know what cons the anti-vaxxers are. And I am not privileged, I lost my job a month before this aired because Dr. Buttar died drumming up media interest and the biotech company I worked at, Outpace Bio in Seattle, found out I was in the media in 2009 then fired me. Which technically is firing someone for a disability."</p>		
3 months ago	Not listed on reddit	<p>Replied "None of the above, why would I want to be disabled instead of have a life as a NFL cheerleader who worked full time at a tech company making great money, owned my own home, to have be a full time crippled? It</p>	FunctionTiny1302	Reddit Post 11

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		doesn't make sense because that was not my goal. I got sick, I was used by anti-vaxxers, and then everyone on the damn internet is too stupid to do any deductive reasoning or logical analysis."		
3 months ago	Not listed on reddit	Commented "Mario Lopez is such a girl. I heard a rumor that he had vaginal rejuvenation done a few years ago. His wife was apparently complaining that his was starting to look like roast beef. But who knows how true that is. I wish TMZ would look more into this."	FunctionTiny1302	<u>Reddit Post 12</u>