

Desirée Townsend  
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PLAINTIFF *IN PRO SE*

Plaintiff,  
DESIREE GUERRIERE TOWNSEND

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

DESIRÉE GUERRIÈRE TOWNSEND, an  
individual,

Plaintiff,

v.

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

Defendant.

Case No.: 25NNCV04089

ASSIGNED FOR ALL PURPOSES TO THE HON.  
ASHFAQ G. CHOWDHURY, DEPT. E

**DECLARATION OF DESIREE TOWNSEND  
IN SUPPORT OF OPPOSITION TO  
DEFENDANT MARIO LOPEZ'S SPECIAL  
MOTION TO STRIKE FIRST AMENDED  
COMPLAINT**

*[Filed concurrently with Opposition to Special  
Motion to Strike First Amended Complaint; Request  
for Judicial Notice; Notice of Lodging; and  
Evidentiary Objections to the Declaration of Daniel  
Tapetillo]*

Date: September 19, 2025

Time: 8:30 AM

Place: Dept. E

Reservation ID: 760241912018

**DECLARATION OF DESIREE TOWNSEND**

I, Desiree Townsend, declare as follows:

1. I am over the age of eighteen and a party in the above-entitled action. I have personal knowledge of the facts set forth herein, which are known by me to be true and correct, and if called as a witness, I could and would competently testify thereto.

2. This declaration is submitted in support of the Opposition (“Opposition”) to Defendant Mario Lopez’s Special Motion to Strike the First Amended Complaint. Unless otherwise stated, capitalized terms have the same meaning as in the Opposition.

3. I am a professional in the legal field focused on litigation and intellectual property with nearly a decade of experience. My work is primarily behind the scenes, supporting attorneys, clients, and businesses. Although I have built a professional reputation for diligence and competence within my industry, I am not a public figure. My name is not widely known to the general public, and I am not the subject of regular media reporting or entertainment press coverage. I have not, at any time, deliberately sought, invited, or encouraged public attention, nor have I attempted to inject myself into any public controversy related to the subject matter of this action. To the contrary, the controversy at issue arose only after Defendant Mario Lopez published false and misleading statements about me on his widely followed Instagram account.

4. The false narrative has negatively impacted my professional opportunities. In June 2024, just days before Defendant’s Instagram post, I was in contact with UCLA’s Technology Development Group regarding potential collaboration with my company at the time, SparkMarks. Through an introduction email, one UCLA contact introduced me to another. Shortly thereafter, following Defendant’s post, I never heard back from either individual. It is my belief that the dissemination of Mr. Lopez’s post to a wide Los Angeles audience, including within professional and academic circles, contributed to the loss of this opportunity.

5. In April 2025, I was subjected to thousands of demeaning, violent, and hateful comments after two videos began circulating on TikTok within hours of each other. Both videos used the same publicly unavailable *Inside Edition* segment that Defendant Mario Lopez had posted on Instagram and

1 that NBC News had previously used in its August 2023 update featuring me. One of the videos, posted  
2 by the account @lightlyseasonedmike, was particularly damaging as it mocked my disability and falsely  
3 claimed that I was faking it for “clout.” Following this video, I was harassed online for weeks. The videos  
4 also appeared in the social media feeds of people I personally know, including a family member and  
5 several co-workers, who brought them to my attention.

6         6. On June 9, 2025, I was contacted through TikTok by an individual who said he worked at  
7 NBCUniversal and could assist me with serving Mario Lopez. I declined his offer because I did not want  
8 to jeopardize his employment, but I thanked him and continued to communicate with him after he  
9 provided another location and address to a church where a process server could attempt service. The  
10 individual identified himself as Angel Mendez. In the course of our conversations, we became friendly  
11 and discussed personal matters, such as the passing of his uncle, as well as professional topics, including  
12 the trademark reform work I was pursuing at Congress.

13         7. I reviewed the Petition filed by Defendant Mario Lopez on June 20, 2025, in the related  
14 matter *Lopez v. Townsend*. The Petition was signed on June 19, 2025, exactly seventy-two (72) hours  
15 after Defendant was served with the summons and complaint in this action, and precisely one year to the  
16 day after his June 19, 2024 Instagram post. Much of the language in the Petition closely mirrored wording  
17 I had previously observed in Reddit posts and in content later published through one of the two TikTok  
18 videos and the TikTok account @walking\_backwards, both of which formed part of the broader smear  
19 campaign directed at me. The Petition also contained more than twenty pages of comments collected  
20 from multiple social media platforms, an unusually large volume for a filing prepared within such a short  
21 timeframe. In my personal experience working for law firms, retaining counsel alone typically requires  
22 at least one to two days if not more, which suggests to me that Defendant’s firm was already prepared  
23 with this filing of the Petition upon service of this lawsuit. Given that it was signed and filed less than  
24 four days after service of my lawsuit, I believe the Petition was drafted in anticipation of my lawsuit and  
25 intended primarily to continue defaming, harassing, and intimidating me.

26         8. Shortly before the first hearing in the related matter, the individual who described himself  
27 as Angel Mendez disclosed to me that he had been working with Defendant’s attorney, Alexandra  
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1 Kazarian, and that his role was to gather information and feed me a “false narrative” intended to make  
2 me appear “unhinged.” He sent me a text message that appeared to be between himself and Ms. Kazarian.  
3 Mr. Mendez was one of only a small number of individuals who had my new phone number, which I  
4 obtained in June 2025. Based on this, I believe that he, or others working with Mr. Lopez, including his  
5 attorney Ms. Kazarian, were responsible for operating the social media account @walking\_backwards,  
6 which publicly posted (doxed) my phone number.

7 9. To identify Angel Mendez, I conducted a reverse image search using one of the  
8 photographs he had sent me. The search results revealed a mugshot and several news articles reporting  
9 his arrest and subsequent prison sentence for criminal threats and for stalking multiple women in  
10 California. After reviewing these materials, I located one of his prior victims and asked whether the  
11 photographs he had sent me matched the individual who had stalked and harassed her. She confirmed  
12 that the images were of the same individual, whose true name is Josiah James Johnstone. That victim  
13 later provided me with posts from a Facebook survivor’s group, dated July 16, 2023, which displayed the  
14 same phone number that both I and Alexandra Kazarian had been using to communicate with him.

15 10. On August 8, 2025, I appeared in the related matter, *Lopez v. Townsend*, where I requested  
16 that the Court permit me to question Defendant’s attorney, Alexandra Kazarian, under oath—not about  
17 privileged attorney-client communications, but regarding her communications with the individual  
18 identifying himself as “Angel Mendez.” Although the Court declined to allow me to question her directly,  
19 it did compel Ms. Kazarian to produce text messages between herself and this individual. Ms. Kazarian  
20 produced multiple such messages for the Court. During the proceedings, the judge asked Ms. Kazarian  
21 to provide the phone number of the individual with whom she had been communicating. Ms. Kazarian  
22 referred to him as “Angel” and confirmed that the phone number she possessed for him was the same  
23 number I had been using to communicate with that individual. I believe Ms. Kazarian was working with  
24 this individual on behalf of Defendant Mario Lopez. She represented to the Court that the individual had  
25 first contacted her through social media. I find it implausible that an attorney affiliated with a law firm  
26 as prominent and well-established as Geragos & Geragos would accept or rely upon an unsolicited  
27 approach from a random individual on social media for information related to this litigation, unless she  
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1 had first been introduced to him by her client. This inference is further supported by the fact that the  
2 individual had previously sent me a photograph of himself with Defendant Mario Lopez. I also believe  
3 this explains why Defendant and his counsel, Alexandra Kazarian, chose not to submit Declarations in  
4 support of his Motion.

5 11. I have reviewed the Declaration of Daniel Tapetillo in support of Mario Lopez's Motion.  
6 The Declaration makes numerous factual assertions that I know of my own personal knowledge to be  
7 false, some of which are identified below. For the avoidance of doubt, these are examples, and are not  
8 intended to be a comprehensive list of every false statement in Tapetillo's Declaration:

9 a. I have not "actively and repeatedly engaged in public media appearances" for more  
10 than "16 years," as stated in paragraph 4 of the Tapetillo Declaration. In reality, media coverage of me  
11 has been limited to two discrete periods: first, in 2009–2010, when *Inside Edition* and other outlets  
12 reported on me without my solicitation and, in many cases, without my participation; and second, in  
13 2023, when NBC News included me in a brief follow-up segment. Outside of those isolated instances, I  
14 have not voluntarily participated in any major media interviews or televised appearances regarding my  
15 medical condition. In the 2023 segment, I did not discuss the details of my medical condition, and it  
16 generated no further or sustained media attention. In fact, I was informed by the journalist who developed  
17 the segment, Brandy Zadrozny, that the segment had been circulated and pitched for broader coverage  
18 across multiple NBCUniversal-affiliated programs, including, to the best of my recollection, *Access*  
19 *Hollywood*. At no point have I sought or solicited publicity on these issues, nor have I attempted to make  
20 myself a public figure in relation to them. In fact, the coverage of this lawsuit, the related matter *Lopez*  
21 *v. Townsend*, and my case against Paramount Global has received no attention from any major media  
22 outlets, including NBC, MSNBC, CBS, ABC, CNN, Fox News, and all other large news organizations.  
23 This absence of coverage underscores that I am a private individual and that my personal matters are of  
24 no legitimate interest to the public.

25 b. Tapetillo's Declaration states at paragraph 6, concerning the anonymous postings  
26 on Reddit, TikTok, and other online platforms, that "Defendant did not create, direct, authorize, or have  
27 any knowledge of the creation of these postings. I have no personal knowledge of the identity of the  
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1 individuals responsible for such postings, and no evidence has been presented to me suggesting  
2 Defendant's involvement." That is false. Mr. Tapetillo was present during hearings in the related matter,  
3 *Lopez v. Townsend*, in which both Mario Lopez and his wife testified regarding an individual working  
4 with their attorney. Mr. Tapetillo was also present, along with members of Geragos & Geragos and an  
5 individual who identified themselves as Mario Lopez's assistant appearing remotely via  
6 LACourtConnect, when co-counsel Alexandra Kazarian produced text messages in court confirming her  
7 communications with this individual. Ms. Kazarian identified him as "Angel" and confirmed that he was  
8 using the same phone number with which I had been in contact. Given his direct presence at these  
9 proceedings, Mr. Tapetillo cannot truthfully claim to have "no personal knowledge" of the individuals  
10 responsible for the anonymous postings or of their connection to Defendant's legal team.

11 12. My illness has been well-documented privately for years by my treating physicians and is  
12 not a matter of public concern. I suffer from diagnosed neurological autoimmune condition that required  
13 years of monthly immunosuppressive therapy, which produced excruciating side effects, including  
14 swelling of the meninges of the brain and spine. As part of my treatment, I required a feeding tube, which  
15 I relied upon for several years until my disease went into remission in early 2023. On more than one  
16 occasion, this disability placed me in the intensive care unit. In late 2023, I nearly lost my life during a  
17 severe breathing crisis in which my blood oxygen levels dropped dangerously low while I was being  
18 transported by ambulance to the hospital. My disability is not fabricated. It is a serious, life-threatening  
19 condition that I continue to live with on a daily basis. The only way I can preserve my health and avoid  
20 a catastrophic setback, or death, is to carefully manage this illness while enduring continuing false attacks  
21 and public ridicule directed at me by Defendant Mario Lopez.

22 13. I have suffered significant harm as a result of Lopez's defamation, including emotional  
23 distress, reputational damage, and the humiliation of being falsely portrayed as someone who malingered  
24 a very real neurological disability in front of a wide audience. Lopez's statements and the narrative that  
25 spread as a result have caused me to lose job opportunities, friendships, and family relationships. I have  
26 also sustained tangible financial losses. Among other things, I was forced to leave my full-time job for  
27 the safety of myself and my coworkers after a convicted felon connected to this matter obtained my work  
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1 address. I was further compelled to move residences and ultimately relocate across the country for my  
2 own safety after the same individual appeared to have obtained my home address from a neighbor and  
3 my personal phone numbers were publicly posted (doxed) online. In addition to these disruptions, I must  
4 carefully manage my disability on a daily basis while simultaneously enduring constant attacks from  
5 Lopez and those working with him, including his attorney, Alexandra Kazarian, and convicted felon  
6 Josiah James Johnstone. These actions have forced me to incur significant expenses to relocate abruptly  
7 and to protect my health, safety, and stability.

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

10 Executed on this 8th day of September, 2025 in New York, NY.

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12  
13 By: 

14 DESIREE GUERRIERE TOWNSEND  
15 PLAINTIFF *IN PRO SE*  
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Defendant's counsel has consented to electronic service in this matter. Accordingly, I caused the foregoing documents, entitled **DECLARATION OF DESIREE TOWNSEND** to be served electronically on the interested parties in this action as follows:

Mark Geragos  
Alexandra Kazarian  
Daniel Tapetillo  
Geragos & Geragos  
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By:   
DESIREE GUERRIERE TOWNSEND