

1 **INTRODUCTION**

2 The purpose of this action is to enjoin and hold to account a self-described “First Amendment
3 Auditor” from Canada who regularly commits felonies by goading victims into being unlawfully
4 pepper sprayed by him, and then profits from the incidents he stages through a monetized
5 YouTube channel known as “True North Transparency.” The incidents have lately been targeted
6 against private citizens rather than public employees, thereby blurring the line between protected
7 activity and private harassment.

8 Plaintiff Andrew G. Watters hereby applies ex parte for a Temporary Restraining Order
9 (“TRO”) and Order to Show Cause re Preliminary Injunction pursuant to Federal Rule of Civil
10 Procedure 65 and 18 U.S.C. § 1964. This application is based on the attached Verified Complaint
11 (incorporated by reference as though fully set forth herein), the Declaration of Andrew G. Watters
12 filed herewith, and the memorandum below.

13 **MEMORANDUM OF POINTS AND AUTHORITIES**

14 **I. INTRODUCTION**

15 Defendant Richard Troyan, a Canadian “First Amendment Auditor” operating the monetized
16 YouTube channel “True North Transparency,” repeatedly threatened Plaintiff with physical
17 violence and pepper spray on March 29, 2026 at Draeger’s grocery store in Menlo Park, California.
18 Approximately two hours later the same day, Defendant actually pepper-sprayed a third party in
19 a similar setting nearby. These acts were staged solely to generate “click-bait” content for
20 Defendant’s revenue-generating YouTube channel. Defendant’s conduct violates RICO (18 U.S.C.
21 § 1962(c)), the Hobbs Act (18 U.S.C. § 1951), California assault law, and constitutes a conspiracy
22 against rights (18 U.S.C. § 241). Immediate injunctive relief is required to prevent further
23 irreparable harm.

24 **II. LEGAL STANDARD**

25 A TRO is warranted where the plaintiff shows: (1) likelihood of success on the merits; (2)
26 likelihood of irreparable harm absent relief; (3) that the balance of equities tips in plaintiff’s favor;
27 and (4) that the injunction is in the public interest. *Winter v. Natural Res. Def. Council, Inc.*,
28 555 U.S. 7, 20 (2008). In the Ninth Circuit, a sliding-scale approach may also apply. *Alliance for*

1 the Wild Rockies v. Cottrell, 632 F.3d 1127, 1131-35 (9th Cir. 2011). Ex parte relief is
2 appropriate when immediate and irreparable injury will result before the adverse party can be
3 heard and the movant certifies efforts to give notice (or reasons why notice should not be
4 required). Fed. R. Civ. P. 65(b)(1).

5 **III. LIKELIHOOD OF SUCCESS ON THE MERITS**

6 Plaintiff is likely to prevail on all claims in the Verified Complaint. Defendant engaged in a
7 pattern of racketeering activity (multiple acts of extortion by threats and actual violence under 18
8 U.S.C. § 1951 affecting interstate commerce via YouTube and retail establishments). The
9 same-day pepper-spray attack on a third party, combined with specific threats to Plaintiff (“hurt
10 [Plaintiff] really badly” and “mace the shit out of [Plaintiff]”), establishes the required pattern and
11 continuing threat under the law.

12 Supplemental state claims (assault) and federal claims (§ 1951, § 241) are also strongly
13 supported by the facts.

14 **IV. IRREPARABLE HARM**

15 Absent a TRO, Plaintiff faces a continuing and imminent risk of physical violence, emotional
16 distress, and interference with his lawful rights to shop and film in public, because he often shops
17 at this and similar stores. The Verified Complaint and Declaration detail the recent violent
18 incident, Defendant’s history of similar attacks (including on elderly women and families), and the
19 random nature of these staged crimes. Monetary damages cannot compensate for the fear of
20 imminent pepper-spray assault or bodily harm. See Herb Reed Enters., LLC v. Fla. Ent. Mgmt.,
21 Inc., 736 F.3d 1239, 1249-50 (9th Cir. 2013) (irreparable harm presumed in certain threat-of-harm
22 cases).

23 **V. BALANCE OF EQUITIES AND PUBLIC INTEREST**

24 The balance of equities tips sharply in Plaintiff’s favor: Defendant will suffer no legitimate
25 hardship from being enjoined from threatening or assaulting Plaintiff or filming him for
26 harassment purposes. The public interest strongly favors preventing violent crime, extortion, and
27 interference with commerce and constitutional rights.

28 **VI. NO ADEQUATE NOTICE POSSIBLE**

1 Defendant is a Canadian citizen with no known local address in the United States (last known:
2 201 Lee Avenue, Whitby, ON L1N 5L4, Canada). Service under FRCP 4(f) and the Hague
3 Convention cannot be completed before further harm occurs. The incident occurred only three
4 days ago (March 29, 2026). Notice is therefore impracticable and would defeat the purpose of the
5 TRO. Fed. R. Civ. P. 65(b)(1)(B); N.D. Cal. Civil L.R. 65-1.

6 Plaintiff additionally seeks a criminal referral of the Defendant to the FBI for his crimes.

7 **DECLARATION OF ANDREW G. WATTERS**

8 I, Andrew G. Watters, declare:

9 I am the Plaintiff in this action and the declarant herein. I have personal knowledge of the
10 facts stated below and, if called as a witness, could and would testify competently thereto.

11 All facts alleged in the Verified Complaint are true and correct. I incorporate the Verified
12 Complaint by reference.

13 On March 29, 2026, while lawfully shopping at Draeger's in Menlo Park, California, Defendant
14 repeatedly confronted me, threatened me with physical violence and pepper spray, and stated he
15 would "hurt [me] really badly" and "mace the shit out of [me]" while I was lawfully filming him
16 from a public space after completing my shopping.

17 Approximately two hours later the same day, Defendant pepper-sprayed a third party in a
18 similar retail setting nearby. Defendant has a documented pattern of staging such incidents for his
19 monetized YouTube channel "True North Transparency."

20 As a direct result, I suffered emotional distress, was obstructed from peacefully shopping and
21 filming in public, and now live in reasonable fear of a future violent attack on me and/or my
22 family of four whenever I shop at Draeger's, which is my favorite grocery store since 1994.
23 Defendant's random appearances throughout California create an imminent and ongoing threat
24 that is totally unpredictable.

25 I have no adequate remedy at law. Immediate injunctive relief is necessary to protect my
26 safety and rights, as well as the rights and safety of others.

27 I have made reasonable efforts to give notice by emailing this package to Defendant's email
28 address (Truenorthtransparency@gmail.com), but given Defendant's foreign citizenship and

1 unknown U.S. whereabouts, formal notice cannot be provided before irreparable harm occurs.

2 The video I took is available here and provides important evidence and context for
3 Defendant's style, showing that he is a whacked-out lunatic and a danger to the public:
4 <https://www.andrewwatters.com/hall-of-shame/agitators/Draegers.mp4>

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

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Date: March 31, 2026

By: Andrew G. Watters
Andrew G. Watters
Plaintiff