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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN MATEO

MAHSA PARVIS, Petitioner, vs. ANDREW GEORGE WATTERS, Respondent.	Case No.: 26FAM01592 RESPONDENT'S MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF EX PARTE APPLICATION TO RECALL AND DISSOLVE TEMPORARY RESTRAINING ORDER

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I. INTRODUCTION

Petitioner Mahsa Parvis, also known as Mahsa Parviz ("Petitioner") was in a month-long relationship with Respondent in May 2021, *over five years ago*. The relationship was entirely based on false pretenses represented by Petitioner, such as that she was a M.D./Ph.D. graduate of Harvard and a successful medical professional who had just moved to the Bay Area, none of which was true. The parties' last in-person contact was in May 2021, which is when Respondent ended the relationship due to Petitioner's bizarre, erratic behavior that was centered around an obsessive crusade to retrieve her daughter from court-ordered foster care. Petitioner was then arrested on Federal charges in June 2021 for conduct that pre-dated the relationship (Respondent's Request for Judicial Notice ("RJN"), Exhs. 1–3.), was convicted in December 2021 (RJN, Exh. 8.), and spent the next several years in prison, being released in early 2026 (RJN, Exh. 10.). While in prison, Petitioner previously sought domestic violence restraining-order relief against Respondent in 2023 in Case No. 23FAM01495 in this Court. No restraining order was issued, and the proceeding was ultimately dismissed (RJN, Exh. 1–3.). Now, without disclosing the prior case or the result, Petitioner has re-filed and obtained extraordinary emergency relief based on a fabricated set of facts, speculation, a relationship that ended five years ago, materially incomplete answers concerning prior litigation, and internet materials that do not establish any act of abuse by Respondent Andrew G. Watters ("Respondent"). This TRO is a extreme and undue burden on Respondent, who is a known shooting sports enthusiast and concealed carry permit holder, and will have to turn in his firearms and CCW permit over this baseless, malicious filing. This is a violation of Respondent's civil rights and cannot be allowed to stand.

Petitioner identifies only two purportedly recent incidents. Neither supports the restraint of Respondent, even on a temporary basis.

First, Petitioner claims that Respondent accessed her Apple or iCloud account and attempted to track her location on July 30, 2026 and on other occasions. Her sole evidence is an automated "Find My" notification stating that a sound was played on a device identified only as "M." The notification does not identify Respondent. It does not show who initiated the sound, what account or device was used, whether anyone logged into Petitioner's account, or whether anyone obtained her location. Petitioner submitted no Apple records, login history, IP information, authentication records, forensic analysis, or other evidence connecting Respondent to the notification. Respondent has never had access to Petitioner's electronic devices or accounts, nor does he have any interest in tracking Petitioner after being happily married to someone else since early 2022.

Second, Petitioner alleges that Respondent retaliated against her on July 27, 2026, by publishing or republishing sexually explicit or defamatory internet content after members of her family requested information concerning Respondent's professional-liability insurance. This is a complete fabrication/delusion. First, Petitioner does not identify the particular content allegedly published on that date. She supplies no link to an allegedly newly posted video, no copy of the alleged material, no before-and-after comparison, no website metadata, and no other evidence showing that Respondent published anything on July 27, 2026. Respondent did not publish anything on that date about Petitioner, nor does Respondent have any sexual videos of Petitioner. The only thing Petitioner could possibly be referring to is a video that *Petitioner* filmed in 2021 of the parties having sex, which was on *Petitioner's phone* that was later seized and erased by the

U.S. government as part of her prosecution. The video no longer exists and is not in Respondent's possession, custody, or control.

Instead of attaching anything from the claimed time frame, Petitioner attached older webpages. The webpage concerning Petitioner dates to March 2022, and the copy attached to her request reflects a last update of February 12, 2026, more than five months before the alleged July 27 retaliation. The separate webpage concerning Judge Chinhayi Cadet addresses Respondent's opinions regarding that judicial officer and proceedings before her, which has nothing to do with Petitioner and in any event is free speech about a public figure. The attached pages do not identify Petitioner, communicate with Petitioner, threaten Petitioner, or establish any act of domestic violence against her. Unlike *In re Marriage of Evilsizor & Sweeney* (2015) 237 Cal.App.4th 1416, where the respondent actually accessed and disseminated the petitioner's private electronic communications, Petitioner here presents no evidence that Respondent accessed any account, obtained any private information, or disseminated any confidential communication.

Petitioner also withheld material context from her petition. She did not disclose that the parties' brief dating relationship ended in 2021 and that Respondent has had no actual contact with her for approximately five years. She did not accurately disclose the disposition of her 2023 San Mateo restraining order proceeding. No restraining order was granted in that case, and the proceeding was dismissed due to Petitioner's failure to prosecute. Yet Petitioner checked "Yes" in response to the present DV-100's question asking whether a restraining order was currently in effect or had expired within the prior six months and identified July 6, 2023 as the date of the supposed order. There was no order, and further, the conduct claimed in the prior case was all addressed by Respondent and is now beyond any statute of limitations.

Petitioner further sought protection for her parents, husband, and daughter (the daughter who was taken away from her in Texas) without identifying any recent contact, threat, communication, approach, or other act directed toward any of them. Respondent has never met Petitioner's parents and has never threatened, inappropriately contacted, or approached any of the additional protected persons.

The Court already recognized the insufficiency of a significant portion of Petitioner's presentation. Although it issued temporary personal-conduct and stay-away orders, the Court declined to order the removal of the internet content, finding Petitioner's requested relief "overly broad" and requiring additional information. The internet content is protected speech and cannot be enjoined in this fashion. If Petitioner has a problem with the web page about her, she can file a civil action for defamation (and it should be noted, she has not done so in the four years since the article was published).

The remaining temporary orders should now be dissolved. Petitioner's application does not provide reasonable proof that Respondent committed a recent act of abuse, and her own exhibits undermine the chronology on which her request depends.

II. FACTUAL AND PROCEDURAL BACKGROUND

A. The Parties Brief Relationship Ended in 2021

Respondent and Petitioner briefly dated in April and May 2021. They were in a relationship for approximately 30 days, during which Petitioner's erratic, bizarre behavior resulted in the end of the relationship shortly before her arrest on Federal charges for conduct preceding the relationship, on which Petitioner was later convicted after a criminal jury trial in December 2021 (RJN, Exhs. 8–9.). The dating relationship ended in May 2021 and was never resumed.

The parties never married, never became engaged, never registered as domestic partners, never lived together, never had a child together, never shared property, and never maintained a joint household. Contrary to Petitioner's representations, Respondent was never Petitioner's attorney—helping a girlfriend out with legal matters does not qualify, and this issue was previously closed out by the State Bar in Respondent's favor—a fact also omitted from Petitioner's petition, though it was addressed *ad nauseam* in the prior DVRO proceeding. The parties have no ongoing domestic, family, financial, or personal relationship. Nor has Respondent contacted or attempted to contact Petitioner during that time, with the sole exception that Respondent filed a civil lawsuit against Petitioner in 2023 seeking to enjoin her from making false, fraudulent Domestic Violence filings after she originally threatened to do so in 2023 (discussed below). Respondent has no interest in contacting Petitioner or knowing anything further about her, as he seeks to avoid her due to her multiple mental illnesses, criminal history, obsessive crusade at regaining custody of her daughter, and similar issues.

As set forth in Respondent's declaration, Respondent has not had any direct personal contact with Petitioner for approximately five years. He has not attempted to resume their former relationship, has not appeared at her claimed home or workplace, has not followed her, has not approached her, nor has attempted to determine her location.

Petitioner's DV-100 merely checks the generic box stating that the parties "are dating or used to date." It does not disclose that their relationship ended over five years before she filed the current request and the current request is three years after her last, dismissed request (RJN, Exhs. 1–3.).

B. Petitioner Previously Sought Restraining-Order Relief Against Respondent

In 2023, Petitioner commenced a prior domestic violence proceeding against Respondent in San Mateo County Superior Court, Case No. 23FAM01495 (RJN, Exhs. 1–3.).

That proceeding involved the same parties, the same internet webpage, and substantially the same historical controversy Petitioner again presents in this case (RJN, Exhs. 2.). As demonstrated by the judicial records submitted with Respondent's Request for Judicial Notice, no temporary or final restraining order was granted against Respondent. The case was dismissed on August 9, 2023, and no restraining order was ever in effect (RJN, Exhs. 1, 3.). It should be noted that Petitioner tried to re-file under the old case number twice in 2023, and the filings were rejected (RJN, Exh. 1.). Petitioner has now spelled her name differently (Compare RJN, Exhs. 1–3 ["Parviz"] with RJN, Exhs. 4–5 ["Parvis"].), presumably to prevent the court from pulling up the old case under a name search. Respondent is filing a Notice of Related Case with this filing.

Petitioner nevertheless answered "Yes" to item 4(a) of her present DV-100, which asks whether a restraining order is currently in place or expired within the preceding six months. She identified July 6, 2023 as the date of the supposed restraining order. A request for a restraining order that was denied is not itself a restraining order, which makes this a false declaration.

Petitioner also omitted the prior case number, the fact that no restraining order was entered, and the case's ultimate dismissal. This combined with everything else is fraud upon the court from someone who is obviously a vexatious litigant.

C. Prior Federal Litigation Between the Parties

In 2023, Respondent filed an action against Petitioner in the United States District Court for the Western District of Washington, *Watters v. Parviz*, Case No. 2:23-cv-00755-RSL. (RJN, Exhs. 6–7.) Respondent sought temporary injunctive relief in that proceeding, which the district

court denied. The district court ultimately dismissed Respondent's action (RJN, Exh. 7.), and the Ninth Circuit affirmed in Case No. 23-35601. The case centered around Petitioner's then-threat to file false Domestic Violence proceedings in San Mateo County in order to trash Respondent's reputation with the local legal community, which she has now done twice. Petitioner expressly demanded the deletion of her Hall of Shame web page, or else she would file the false DV proceedings. When Respondent refused to submit to this blackmail, Petitioner filed her original DVRO petition in 2023. It should be noted that the prior TRO in 2023 was denied, which makes the current partial grant very unfortunate.

The rulings in the Federal action did not find that Respondent committed domestic violence, accessed Petitioner's Apple account, tracked her location, threatened her, or committed any of the conduct alleged to have occurred in July 2026. The Ninth Circuit's disposition concerned the sufficiency of Respondent's federal pleading and federal subject-matter jurisdiction, which was found to be absent. In other words, there was no adjudication on the merits.

Petitioner nevertheless attached only the one-page federal judgment of dismissal to her current request. She did not explain the issues adjudicated, the basis for the dismissal, or the absence of any domestic-violence finding. She also answered "No" when asked whether she was involved in another court case with Respondent, while simultaneously relying upon documents from prior litigation between them.

At a minimum, Petitioner's disclosure was materially incomplete and deprived the Court of the context necessary to evaluate the significance of the attached judgment.

D. Petitioner's Federal Convictions and Recent Release

Petitioner was convicted in the United States District Court for the Central District of California of making a false statement in a passport application, in violation of title 18 United States Code section 1542, and aggravated identity theft, in violation of title 18 United States Code section 1028A(a)(1). (RJN, Exh. 8; *United States v. Parviz* (9th Cir. 2025) 131 F.4th 966.)

The convictions arose from Petitioner's use of false statements and a fraudulent medical letter in an effort to obtain a passport for her biological daughter after her parental rights had been terminated. The Ninth Circuit affirmed both convictions and Petitioner's sentence in *United States v. Parviz* (9th Cir. 2025) 131 F.4th 966, though Petitioner continues to aggressively litigate all possible bases to challenge her conviction, stubbornly refusing to take responsibility for her actions in attempting to kidnap her estranged daughter to Iran.

Official records further reflect that Petitioner was released from federal custody on or about February 27, 2026 (RJN, Exh. 10.), and is subject to a term of supervised release. Respondent offers these records for the limited purposes of establishing the complete procedural chronology and evaluating Petitioner's credibility, not to suggest that a criminal conviction alone resolves the present request. However, it should be noted that Petitioner admits to several serious mental illnesses, including Borderline Personality Disorder, Bipolar Disorder, and others in her various Federal filings including her own psychologist's pre-sentencing report.

E. Petitioner Filed the Present DV-100

On August 3, 2026, Petitioner filed the present DV-100. She requested no-abuse, no-contact, 100-yard stay-away, firearms turn-in, recording, internet-content-removal, and related orders. She also requested protection for her mother, father, daughter, and claimed husband.

Petitioner identified July 30, 2026 as the date of the most recent alleged abuse. She alleged that an automated Apple notification meant that Respondent had accessed her account and attempted to track her location.

Petitioner separately alleged that on July 27, 2026, sexually explicit or defamatory material appeared online after members of her family requested information concerning Respondent's professional-liability insurance.

On August 4, 2026, the Court issued temporary no-abuse, no-contact, stay-away, firearms, and related orders. It set a firearms-compliance hearing for August 24, 2026, and a hearing on the DVRO request for August 26, 2026. The Court did not grant Petitioner's requested website-removal order, finding it overly broad and requiring additional information.

III. LEGAL STANDARD

The Domestic Violence Prevention Act ("DVPA") authorizes a court to issue a protective order upon "reasonable proof of a past act or acts of abuse." (Fam. Code, § 6300, subd. (a).) "Abuse" includes intentionally or recklessly causing or attempting to cause bodily injury, sexual assault, placing a person in reasonable apprehension of imminent serious bodily injury, or engaging in conduct that may be enjoined under Family Code section 6320. (Fam. Code, § 6203, subd. (a).) Section 6320 permits the Court to enjoin conduct including stalking, threatening, harassing, contacting, and "disturbing the peace of the other party." (Fam. Code, § 6320, subd. (a).)

"Disturbing the peace" means conduct that, under the totality of the circumstances, destroys the mental or emotional calm of the other party. (Fam. Code, § 6320, subd. (c); *In re Marriage of Nadkarni* (2009) 173 Cal.App.4th 1483, 1497*)* Electronic conduct may constitute abuse where the evidence establishes that a respondent actually accessed, read, disclosed,

monitored, or otherwise misused a petitioner's private electronic information. (*Nadkarni*, supra, at pp. 1497-1499.) In *Nadkarni*, for example, the allegations were sufficient because the respondent allegedly accessed, read, and publicly disclosed the petitioner's confidential emails.

But the DVPA does not authorize a restraining order merely because challenged conduct is upsetting or objectionable. In *Curcio v. Pels* (2020) 47 Cal.App.5th 1 the Court of Appeal reversed a DVRO where a former partner's single private Facebook post did not constitute sufficient evidence that she disturbed the petitioner's peace. (Id. at pp. 14-16.) The court distinguished cases such as *Nadkarni*, where the restrained party actually accessed and disseminated confidential communications, and emphasized that there was no evidence in *Curcio* of unwanted communications, disclosure of private information, or comparable conduct.

The burden remains on the party seeking protection to establish abuse. The issuance of a temporary restraining order does not create a presumption that the allegations are true or shift the burden to the restrained party to disprove them. (*Curcio*, supra, 47 Cal.App.5th at pp. 17-19.) Rather, the petitioner bears the burden of establishing past abuse by a preponderance of the evidence. (*In re Marriage of Davila & Mejia* (2018) 29 Cal.App.5th 220, 226*; Curcio*, supra, at pp. 17-18.)

Although the age of an alleged act of abuse does not, standing alone, preclude relief, the Court must consider the totality of the circumstances. (Fam. Code, § 6301, subd. (d).) Thus, the approximately five-year absence of contact between these parties is not independently dispositive, but it is properly considered together with the nature, timing, and evidentiary support for Petitioner's claimed recent acts.

Finally, San Mateo County Superior Court Local Rule 5.6(H) expressly authorizes a responding party to request that an ex parte order be set aside before the noticed hearing. Where

such a request is made, notice must be provided to the moving party, and the Court may set aside the order or, upon a proper showing, modify the order or set an earlier hearing in lieu of setting it aside. (San Mateo County Super. Ct. Local Rules, rule 5.6(H).) The same local rule provides that ex parte applications are strongly disfavored and are granted only upon a substantial showing of need. Against that standard, the temporary order should not remain in place where Petitioner's asserted recent acts of abuse are unsupported by competent evidence and her own exhibits undermine the factual basis for emergency relief.

IV. ARGUMENT

A. The Apple Notification Does Not Provide Reasonable Proof That Respondent Accessed or Tracked Petitioner

Petitioner's alleged "most recent abuse" depends entirely on an automated Apple notification stating that a sound was played on a device identified as "M" on July 30, 2026.

The notification does not identify Respondent. It does not identify:

1. The person who initiated the sound;
2. The Apple account used to initiate it;
3. The device from which it was initiated;
4. An IP address associated with the request;
5. Any login by Respondent;
6. Any authentication associated with Respondent;
7. Any geographic information obtained by Respondent; or
8. Any communication from Respondent.

Petitioner submitted no declaration from Apple, no account-access history, no device records, no forensic analysis, and no other competent evidence tying Respondent to the notification.

Respondent declares unequivocally that he did not access Petitioner's Apple or iCloud account, did not cause a sound to be played on her device, and did not attempt to determine her location. He does not possess and has never had her password, authentication codes, device passcodes, or other account credentials. Respondent has never had access and does not now have access to any iCloud or Apple accounts of Petitioner, nor does he have any interest in doing so after ending the relationship with Petitioner in May 2021 and being happily married to someone else since early 2022, including having two children since then.

Petitioner's theory requires the Court to assume that Respondent retained access to an account for approximately five years, remained logged into the account, initiated the sound, and did so for the purpose of tracking Petitioner. The Apple notification proves none of those propositions.

An unsupported inference layered upon an unattributed automated message is not reasonable proof that Respondent committed an act of abuse.

B. The Petitioner Submitted No Evidence of a July 27, 2026 Retaliatory Publication

Petitioner also alleges that sexually explicit or defamatory material appeared online after members of her family requested Respondent's professional-liability insurance information on July 27, 2026.

However, Petitioner does not identify the particular content allegedly posted on that date.

She supplies:

1. No link to an allegedly newly posted video;
2. No copy of any alleged video or image;
3. No identification of the particular statement allegedly added;
4. No screenshot showing that the content first appeared on July 27;
5. No before-and-after comparison of the webpage;

6. No publication metadata;
7. No website audit or access log;
8. No archived version of the webpage; and
9. No evidence showing that Respondent published or republished anything in response to the insurance request.

The webpage concerning Petitioner is dated March 11, 2022. The version attached to Petitioner's own filing reflects a last update of February 12, 2026, more than five months before the alleged July 27 incident.

Respondent denies creating, uploading, publishing, republishing, or materially modifying the webpage on July 27, 2026 or otherwise publishing the claimed content. He further denies posting any material in retaliation for a request concerning insurance information. In any case, there was no contact to his law firm for the requested information in the time frame specified, which Respondent can be sure of because he has blocked the entire Parviz family from emailing due to their own harassing behavior (they can still call the office, however—but have not done so). Respondent denies having any explicit video of Petitioner—Petitioner, however, did have one explicit video of the parties in 2021, and that was on a device that was later wiped by the Federal government. There is no video, nor has Respondent ever threatened to release or actually released a video or anything else improper. Petitioner points to no such threat anywhere.

Petitioner's evidence therefore fails to establish either the alleged act or its supposed connection to Respondent.

C. The Judge Cadet Webpage Does Not Mention Petitioner or Constitute Abuse Against Her

Petitioner also relies on a separate webpage concerning Judge Chinhayi Cadet.

As the Court can determine from the pages attached to Petitioner's own request, that posting concerns Respondent's opinions regarding Judge Cadet and proceedings before that judicial officer. The displayed pages discuss Judge Cadet, other attorneys, other litigants, and other family-law proceedings, which have nothing to do with Petitioner.

The attached pages do not identify Petitioner. They do not communicate with Petitioner, direct any statement to Petitioner, threaten Petitioner, disclose a private communication from Petitioner, or encourage anyone to contact her.

Respondent stands by his posting concerning Judge Cadet, who is a public figure and deserves criticism in the court of public opinion. Whether Petitioner or her witnesses disagree with the posting is not evidence that Respondent committed domestic violence against Petitioner.

The DVPA does not provide a vehicle for restraining speech merely because a former dating partner disagrees with or is upset by commentary concerning an unrelated third person. (*Curcio v. Pels*, 47 Cal.App.5th 1 (2020))

D. Petitioner Materially Misrepresented the Prior 2023 Restraining-Order Proceeding

Item 4(a) of the present DV-100 asks whether any restraining order is currently in effect or expired within the preceding six months.

Petitioner checked "Yes" and entered July 6, 2023 as the date of the purported restraining order. She filed her present request on August 3, 2026, more than three years later.

More importantly, the judicially noticeable records demonstrate that no temporary or final restraining order was granted in the 2023 proceeding. Petitioner's request was denied, and the case was dismissed. (RJN, Exhs. 1–3.)

A denied request for a restraining order is not itself a restraining order. Petitioner's answer affirmatively declares that an order had existed when the records show that none was entered.

Petitioner also omitted the prior case number, the denial of relief, the dismissal, and the fact that the earlier proceeding involved the same internet webpage and underlying controversy. (RJN, Exh. 2.)

Those omissions were material. The incomplete answer prevented the Court from evaluating the present ex parte request against the backdrop of Petitioner's prior unsuccessful effort to obtain restraining-order relief arising from substantially the same dispute. This demonstrates that the filing by Petitioner is a complete fraud on the court and was solely filed to harass and intimidate Respondent into removing his Hall of Shame web page about Petitioner.

E. Petitioner's Supporting Declarations Do Not Establish Recent Abuse

Petitioner submitted declarations from Sophia Sobhani and Shamsi Parviz. Neither declarant claims to have personally observed

Respondent:

1. Access Petitioner's Apple or iCloud account;
2. Cause a sound to be played on Petitioner's device;
3. Obtain Petitioner's location;
4. Follow or approach Petitioner;
5. Threaten Petitioner in July 2026;
6. Publish sexually explicit material on July 27, 2026; or
7. Contact or threaten any additional protected person.

The declarations instead repeat statements allegedly made by Petitioner, discuss historical disputes, express opinions concerning Respondent, and speculate about electronic access and online publication.

The declarants' purported concern for Petitioner does not supply the missing evidentiary connection between Respondent and either alleged July 2026 incident.

F. There Is No Factual Basis for Protecting Petitioner's Parents, Husband, or Daughter from Respondent

Petitioner obtained temporary protection for her mother, father, daughter, and husband. Her request identifies no recent communication, threat, physical approach, surveillance, contact, or other act directed toward any of those people.

Respondent declares that:

1. He has never met Petitioner's mother, Shamsi Parviz;
2. He has never met Petitioner's father, Bahman Parviz;
3. He has never contacted, threatened, or approached either parent, except to respond to their email correspondence to him, which was entirely appropriate;
4. He has never contacted, threatened, or approached Petitioner's claimed husband, Blake Maso;
5. He has never contacted or approached Petitioner's daughter who is in foster care (and was taken away from Petitioner for various prior felonies); and
6. He does not know the present locations, workplaces, schools, or daily activities of the additional protected persons.

The declarations express fear of Respondent but do not identify conduct establishing that any additional protected person requires emergency protection from him.

Family Code section 6320 permits protection of additional family or household members only "on a showing of good cause." (Fam. Code, § 6320, subd. (a).) Where Petitioner identifies

no threat, contact, approach, surveillance, or other conduct directed toward any of these additional persons, the record does not establish good cause for extending emergency protection to them.

G. Petitioner's Firearm Allegations Are Factually Incorrect and Do Not Establish Abuse

Respondent does not own a Smith and Wesson revolver as claimed by Petitioner, nor did he ever show any firearms to Petitioner during the brief month-long relationship, or otherwise—early on in the relationship, Petitioner presented as not mentally stable, and certainly was not responsible enough to handle firearms safely. Respondent is a known shooting sports enthusiast who has several other firearms, and this is also known to Petitioner. Petitioner is using the threat of removal of a modest gun collection to pressure Respondent into settling, and this is improper as well as a violation of Respondent's civil rights.

H. Petitioner's Convictions Bear on the Credibility of Her Unsupported Allegations

Petitioner's present request depends almost entirely on her credibility. No objective evidence connects Respondent to the Apple notification, and no objective evidence establishes a July 27, 2026 retaliatory publication.

The judicially noticeable records establish that Petitioner was most recently convicted of making a false statement in a passport application and aggravated identity theft. The Ninth Circuit affirmed those convictions in *United States v. Parviz* (9th Cir. 2025) 131 F.4th 966. (RJN, Exh. 8; *United States v. Parviz* (9th Cir. 2025) 131 F.4th 966.)

The Ninth Circuit's opinion explains that Petitioner made false representations concerning her parental status and submitted a fraudulent medical letter bearing another person's identifying information. Petitioner has an extensive history of other crimes, for which she spent

several years in a Texas prison. This was all denied by Petitioner in the early stage of the relationship with Respondent and was only fully discovered by Respondent in 2022 when he discovered that the Harvard persona was a complete fabrication and that Petitioner was an impostor who never went to the actual Harvard. Like essentially any member of the public, Petitioner was able to attend Harvard Extension, which is a different program that does not terminate in a Harvard degree. Harvard Extension gave Petitioner access to the Harvard web server, and it was the fake Harvard web pages that Petitioner posted (since deleted by Harvard) that gave Petitioner documentary support for her claims and that made the difference for Respondent in deciding to continue dating her for the brief relationship-fully believing her false representations at the time. This pattern of fraud and deceit shows that Petitioner is not credible, and this Court has a duty to avoid imposing draconian results on Respondent based on Petitioner's entirely and demonstrably false pretenses.

Respondent does not offer these convictions as evidence that Petitioner acted in conformity with criminal conduct. He offers them for the limited purpose of evaluating credibility where Petitioner seeks extraordinary emergency relief based upon unsupported assertions and inferences. (Evid. Code, §§ 788, 352.)

I. Immediate Dissolution Is Necessary

The temporary order places Respondent in CLETS, exposes him to arrest and criminal liability for an alleged violation, restricts his communications and movement, prohibits firearm possession, and requires him to remain 100 yards away from multiple people and locations. It also requires Respondent to attend a firearms-compliance hearing on August 24, 2026. This is a drastic remedy with no recourse and is a severe burden on Respondent, particularly in the area of storing his firearms and turning in his CCW permit for the duration of the case.

A domestic violence restraining order is no ordinary injunction. Its violation can carry criminal consequences, and the existence of the order can impose significant professional and reputational harm. (*Curcio v. Pels*, 47 Cal.App.5th 1 (2020*)*)

Those burdens should not remain in place based on an Apple notification that does not identify Respondent, an internet-publication chronology contradicted by Petitioner's exhibits, stale disputes from a relationship that ended approximately five years ago, and third-party declarations that establish no recent conduct based on personal knowledge. This TRO is unfair and a huge burden on Respondent, and must be recalled and dissolved for the reasons indicated, and in the interests of justice, before Petitioner again misuses the court system to pressure Respondent into removing his entirely fair and accurate online page about Petitioner, which is her sole real goal here.

V. Conclusion

For the foregoing reasons, Respondent respectfully requests that the Court immediately recall, set aside, and dissolve the Temporary Restraining Order issued on August 4, 2026, in its entirety, vacate the firearms-compliance hearing presently scheduled for August 24, 2026, and direct that CLETS and any other applicable law-enforcement records be updated accordingly.

Dated: August 7, 2026

Andrew G. Watters

Andrew G. Watters
In Pro Per