

THE PARMENTER LAW OFFICES
LIGIA MELENDEZ PARMENTER (SBN:176196)
LMParmenter@LawPar.com
501 'B' Street, Suite 200
San Rafael, CA 94901-3846
Tel/Fax: (415) 738-7901

Plaintiff in pro per

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN MATEO**

LIGIA PARMENTER,

Plaintiff,

vs.

ANDREW G. WATTERS, and DOES 1-50
inclusive,

Defendants.

Case No.: 25-CIV-01944

The Hon. Mark A. McCannon

**DECLARATION AND COMPENDIUM
OF EVIDENCE OF PLAINTIFF LIGIA
PARMENTER IN OPPOSITION TO
SPECIAL MOTION TO STRIKE (CCP §
425.16):**

1. Defamation / Libel
2. Electronic Cyber-Harassment —
Cal. Penal Code § 653.2(a)-(c)(1)-(2)
3. Electronic Cyber-Stalking —
Cal. Penal Code § 646.9(a);(e)-(h)
4. Extortionate Threats —
Cal. Penal Code §§ 518, 519, 523(a)
5. Commercial Speech Exemption —
Cal. Civ. Code § 425.17(c)

Date: February 5, 2025

Time: 2:00 p.m.

Dept.: 2

Action Filed: March 10, 2025

Trial Date: None

**DECLARATION AND COMPENDIUM OF EVIDENCE OF PLAINTIFF
LIGIA PARMENTER IN OPPOSITION TO DEFENDANT'S SPECIAL MOTION TO
STRIKE (CODE CIV. PROC., § 425.16)**

TO THE HONORABLE COURT, ALL PARTIES, AND THEIR RESPECTIVE
COUNSEL OF RECORD:

1 Plaintiff and Declarant Ligia Parmenter (“Plaintiff”) respectfully submits this
2 Declaration and Compendium of Evidence in Opposition to Defendant’s Special Motion to
3 Strike (“Compendium”).

4 *Introductory Note Regarding Organization of Compendium of Evidence:*

5 For the Court’s convenience, the first section of this Compendium contains reduced-size
6 preview screenshots organized thematically to provide a visual overview of the documentary
7 content at issue. These preview images are illustrative only and are not offered independently for
8 evidentiary purposes. Any highlighting, or arrows, are included solely for the Court’s
9 convenience.

10 Each preview screenshot corresponds to a full-size exhibit that is set forth at the end of
11 the Compendium. Each full-size exhibit is followed by an exhibit authentication and source
12 information page identifying the source URL, date and time accessed, method of capture, and
13 any archival or preservation steps taken. All full-size exhibits and accompanying authentication
14 pages are authenticated by the Declaration of Ligia Parmenter, which appears immediately
15 following the preview section.

16 Dated this 16th day of January 2026.

Respectfully submitted,

PARMENTER LAW OFFICES

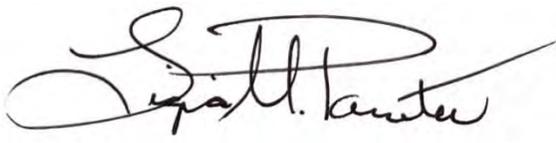
17
18
19 By: 
20 Ligia Melendez Parmenter
21 Plaintiff
22
23
24
25
26
27
28

TABLE OF CONTENTS

I. SECTION 1 —
Screenshots of Google, Bing, Yahoo, DuckDuckGo, and ChatGPT search results for “Ligia Parmenter, Esq.” showing Andrew Watters (“Watters”) manufactured Snippets appearing at the top of search results on a 24/7 basis1
A. GOOGLE — Watters’ manufactured Snippets appearing as top search results for “Ligia Parmenter, Esq.,” reflecting repeated and ongoing online publications.....1
1. Exhibit 1-A — Google search result snippets manufactured by Watters falsely accusing Plaintiff of RICO (Racketeer Influenced and Corrupt Organizations Act) criminality and unlawful practice of law.....1
2. Exhibit 1-B — Google search result Snippets manufactured by Watters falsely asserting that Plaintiff is unlawfully practicing law due to “various issues.”2
3. Exhibit 1-C — Google search result Snippets manufactured by Watters falsely claiming that Plaintiff is intellectually deficient and mentally unstable.2
4. Exhibit 1-D — Google search results for “Ligia Parmenter, Esq.” showing Defendant Watters’ manufactured Snippets occupying the top four indexed positions with his defamatory false statements.....3
B. BING — Defendant Watters’ manufactured search engine Snippets appearing as top search results for “Ligia Parmenter, Esq.” through repeated, ongoing online publication.....3
1. Exhibit 1-E — Bing search result Snippets manufactured by Watters falsely accusing Plaintiff of RICO (Racketeer Influenced and Corrupt Organizations Act) criminality in Mexico and unlawful practice of law.3
2. Exhibit 1-F — Bing search result snippets published by Christina Chung Watters, - an employee and CFO of Watters’ law office, targeting Plaintiff with defamatory content and falsely accusing her of Racketeer Influenced and Corrupt Organizations Act criminality.4
3. Exhibit 1-H — Bing search result Snippets manufactured by Watters falsely claiming that Plaintiff is intellectually deficient, mentally unstable, and unlawfully practicing law through repeated online publication.5
4. Exhibit 1-I — Bing search result snippets originating from ChristinaWatters.com, published by Christina Chung Watters, who identifies herself as CFO of Watters’ law office and a California-licensed real estate broker.5
5. Exhibit 1-J — Bing search results for “Ligia Parmenter, Esq.” showing six (6) uninterrupted, back-to-back Watters-manufactured defamatory Snippets, demonstrating unlawful electronic cyber-harassment and search-engine manipulation (Cal. Penal Code § 653.2(a)–(c)(1)–(2))......6
C. YAHOO — Defendant Watters’ manufactured defamatory Snippets appearing as top search results for “Ligia Parmenter, Esq.” through repeated, ongoing online

1 retaliation, and Plaintiff’s reasonable fear of future intimidation and harm.....17

2 D. Exhibit 3-D— False statements by Defendant Andrew Watters alleging a “Mexico

3 RICO timeshare scam,” offered to demonstrate racially targeted defamatory

4 conduct directed at Plaintiff as a Latina attorney.....18

5 IV. SECTION 4 —.....18

6 A. Exhibit 4-A— Screenshot of Watters’ “Hall of Shame” webpage displaying

7 Plaintiff’s name prominently as the headline on his law-office website, evidencing

8 intentional public targeting through continuous online publication.18

9 B. Exhibit 4-B— Screenshot showing Watters’ use of a “Hall of Justice and

10 Records” emblem adjacent to false defamatory statements about Plaintiff,

11 misrepresenting them as court-sanctioned findings.....19

12 C. Exhibit 4-C— False and defamatory per se statements deliberately placed together

13 by Watters on his “Hall of Shame” to generate false statements of fact across

14 Google, Bing, Yahoo, DuckDuckGo, and ChatGPT search results portraying

15 Plaintiff as a criminal RICO Racketeer Influenced and Corrupt Organizations Act

16 in “Mexico” and a time share scammer.20

17 D. Exhibit 4-D— False and defamatory per se statement published by Watters

18 asserting that Plaintiff “should not be practicing law” and is engaged in unlawful

19 practice of law, used to dominate search-engine snippets.20

20 E. Exhibit 4-E— False and defamatory per se statement published by Watters

21 asserting that Plaintiff is mentally deficient and mentally unstable, used to

22 dominate search-engine snippets.21

23 1. Exhibit 4-E-1. — Screenshot showing Watters’ photo-doxing of Plaintiff on

24 his “Hall of Shame” webpage, including underlined text and a hyperlink

25 directing to Plaintiff’s law-office webpage with her photograph.21

26 F. Exhibit 4-F— False and defamatory per se statement published by Watters

27 asserting that Plaintiff is unlawfully practicing law and is mentally deficient and

28 mentally unstable, used to dominate search-engine snippets.....22

G. Exhibit 4-G— Evidence showing Watters publishing false and harassing

statements about Plaintiff on the secondary website “JD Underground”

(www.slash.law), including claims that Plaintiff is mentally unstable and

unlawfully practicing law.22

V. SECTION 5 —

Defendant Watters’ Commercial Law-Firm Domain And Defamatory Marketing

Infrastructure: Evidence establishing that www.andrewwatters.com is a commercial

law-office website, that the “Hall of Shame” is a core attorney-marketing feature

designed for search visibility, and that Defendant’s publications constitute commercial

speech rather than personal or litigation-privileged commentary.....23

A. Exhibit 5-A— Photograph showing Watters working at a multi-monitor

workstation associated with www.andrewwatters.com, offered to demonstrate his

direct operational control over the website and its published content.23

B. Exhibit 5-B— Search-engine results for “Andrew Watters attorney” showing

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

- A. Exhibit 7-A — True and correct screenshot of a Google search for “Ligia Parmenter interview” showing zero results, submitted to confirm Plaintiff is not a public figure and has no media or interview presence.....35
- B. Exhibit 7-B — Screenshot of a Google search for “Ligia Parmenter news” showing zero results, submitted to confirm Plaintiff has no press coverage and is not a public figure.36
- C. Exhibit 7-C — Screenshot of a Google search for “Ligia Parmenter public figure” showing zero results, submitted to confirm Plaintiff is not recognized as a public figure.36
- D. Exhibit 7-D — Screenshot of a Google search for “Ligia Parmenter influencer” showing zero results, submitted to confirm Plaintiff is not an influencer or public figure.37
- E. Exhibit 7-E — Screenshot of a Google search for “Ligia Parmenter politician” showing zero results, submitted to confirm Plaintiff has no political role and is not a public figure.37
- F. Exhibit 7-F — Screenshot of a Google search for “Ligia Parmenter celebrity” showing zero results, submitted to confirm Plaintiff is not a celebrity or public figure.38
- VIII. SECTION 8 —38
 - A. Exhibit 8-A— Zelle Payment Receipts Documenting Some of Plaintiff’s Out-of-Pocket Therapy Costs Incurred in Connection with Ongoing Psychological Treatment38

- DECLARATION OF LIGIA M. PARMENTER 40

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

**DECLARATION AND COMPENDIUM OF EVIDENCE
OF PLAINTIFF LIGIA PARMENTER, ESQ. IN OPPOSITION TO
SPECIAL MOTION TO STRIKE (CCP § 425.16)**

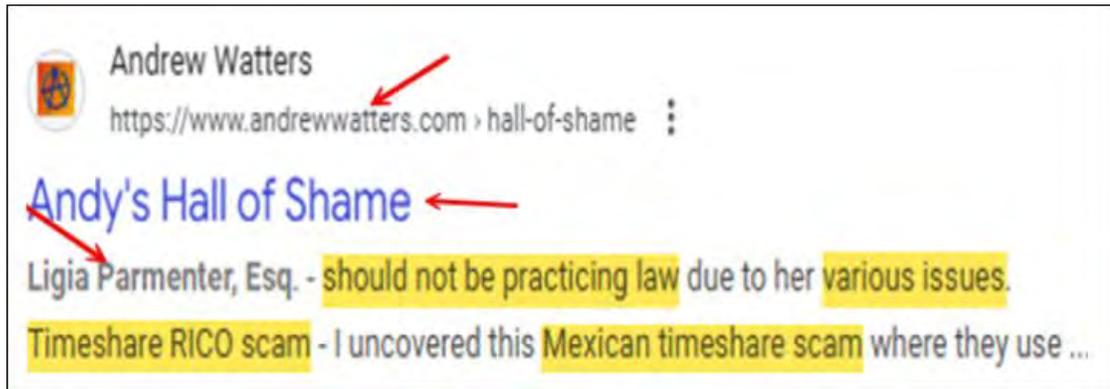
I. SECTION 1 —

Screenshots of Google, Bing, Yahoo, DuckDuckGo, and ChatGPT search results for “Ligia Parmenter, Esq.” showing Andrew Watters (“Watters”) manufactured Snippets appearing at the top of search results on a 24/7 basis, containing patently false statements of fact alleging criminal conduct, mental unfitness, and unlawful practice of law, consistent with Watters’ September 19, 2023 threat.

A. GOOGLE — Watters’ manufactured Snippets appearing as top search results for “Ligia Parmenter, Esq.,” reflecting repeated and ongoing online publications.

1. Exhibit 1-A — Google search result snippets manufactured by Watters falsely accusing Plaintiff of RICO (Racketeer Influenced and Corrupt Organizations Act) criminality and unlawful practice of law.

a) Laptop View of Google Search



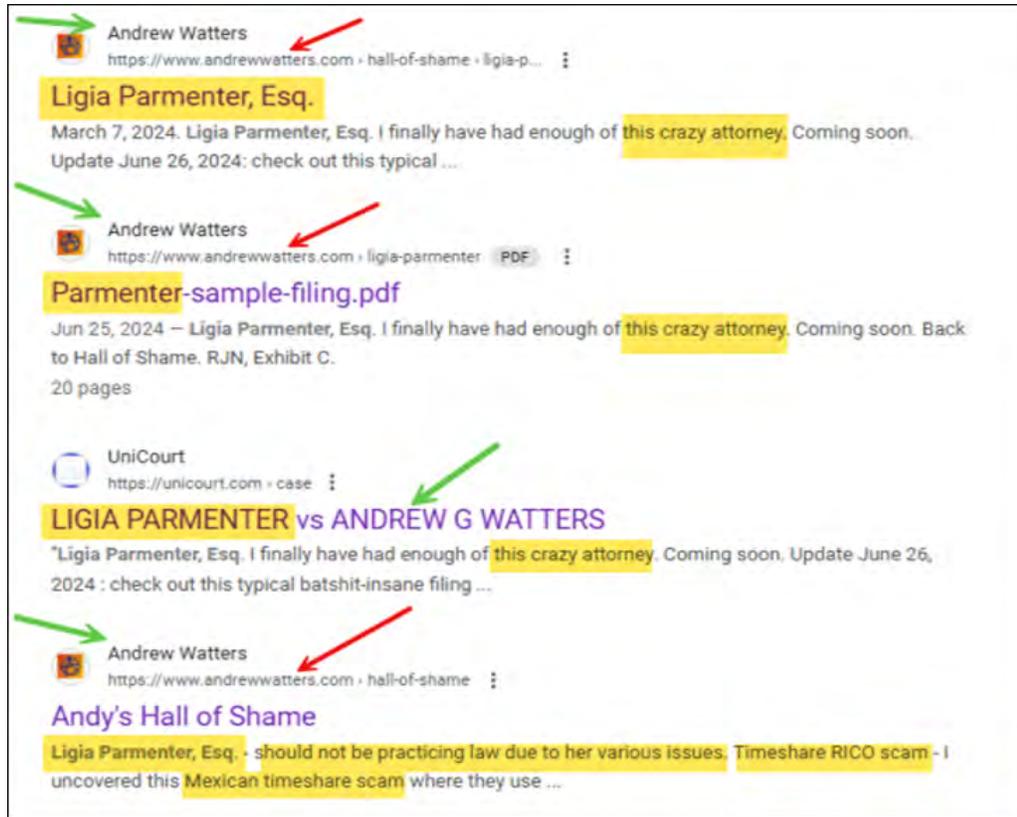
b) iPhone Mobile View of Google Search



True and correct copy of Watters’ Snippets attached hereto as Exhibit 1-A.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

4. **Exhibit 1-D** — Google search results for “Ligia Parmenter, Esq.” showing Defendant Watters’ manufactured Snippets occupying the top four indexed positions with his defamatory false statements.

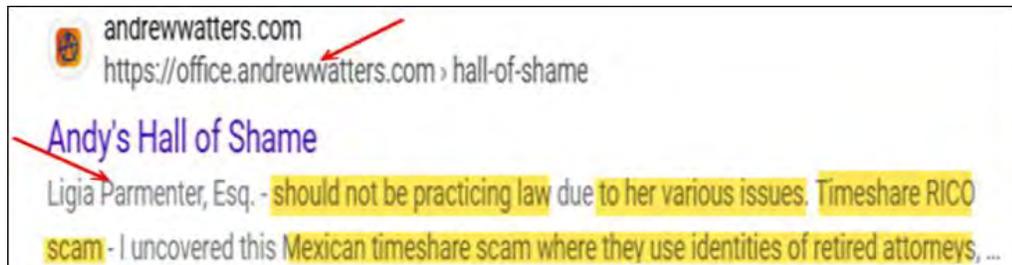


True and correct copy of Watters’ Snippets attached hereto as Exhibit 1-D

B. **BING** — Defendant Watters’ manufactured search engine Snippets appearing as top search results for “Ligia Parmenter, Esq.” through repeated, ongoing online publication.

1. **Exhibit 1-E** — Bing search result Snippets manufactured by Watters falsely accusing Plaintiff of RICO (Racketeer Influenced and Corrupt Organizations Act) criminality in Mexico and unlawful practice of law.

a) Laptop View of Bing Search

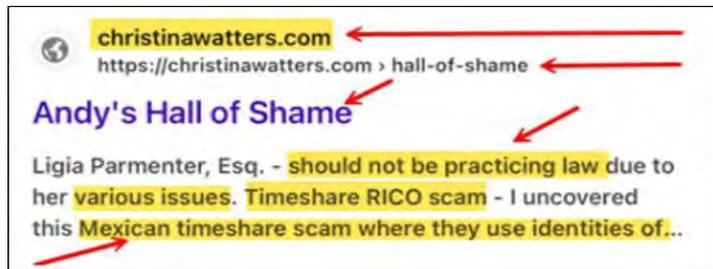


b) iPhone Mobile View of Bing Search



True and correct copy of Watters' Snippets, attached as **Exhibit 1-E**, appearing repeatedly on Bing mobile search results and asserting that Plaintiff is a Racketeer Influenced and Corrupt Organizations Act criminal who should not be practicing law.

2. **Exhibit 1-F** — Bing search result snippets published by Christina Chung Watters, - an employee and CFO of Watters' law office, targeting Plaintiff with defamatory content and falsely accusing her of Racketeer Influenced and Corrupt Organizations Act criminality.¹



True and correct copy of Andrew Watters' employees/worker/LAW OFFICE CFO's Snippet attached hereto as **Exhibit 1-F**

¹ Watters law office "CFO" "Christina Chung Watters" simultaneously markets herself as a California-licensed Realtor® (Real Estate Broker License #02011518). These online publications, incited by and deployed in coordination with Watters' electronic cyber-harassment campaign (Cal. Penal Code §653.2), are engineered to dominate search results, algorithmically amplify defamatory accusations, and suppress truthful attorney verification and neutral public records from reasonable search visibility. (Repeated, ongoing, 24/7 internet publication deployed to relentlessly cyber-harass and defame "Ligia Parmenter, Esq." without interruption.)

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

a) **Exhibit 1-G** — Archived copy of Defendant Watters’ law office website identifying Christina Chung Watters as Chief Financial Officer (CFO) of his law office.

— Evidence showing Watters using a law-office employee to engage in ongoing online publications targeting Plaintiff on major search engines.



(Watters’ Law Office Website (archived by the Internet Archive’s Wayback Machine on March 4, 2024), Available at: <https://web.archive.org/web/20240304011435/http://andrewwatters.com/law/>)
True and correct copy attached hereto as Exhibit 1-G

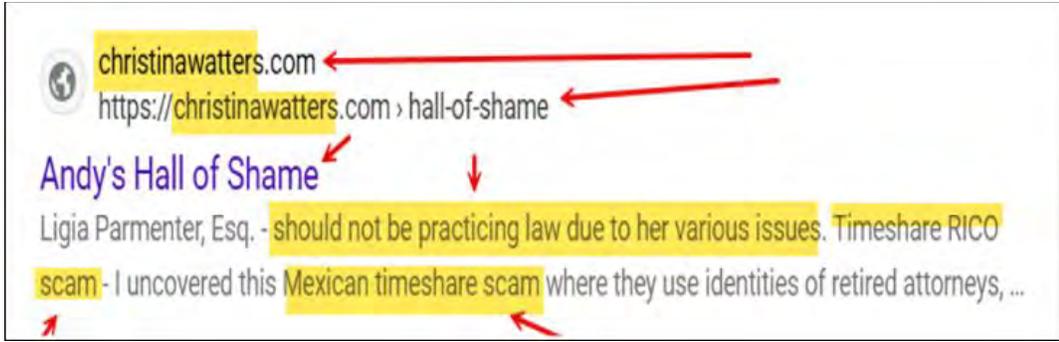
3. **Exhibit 1-H** — Bing search result Snippets manufactured by Watters falsely claiming that Plaintiff is intellectually deficient, mentally unstable, and unlawfully practicing law through repeated online publication.

a) Laptop View of Bing Search



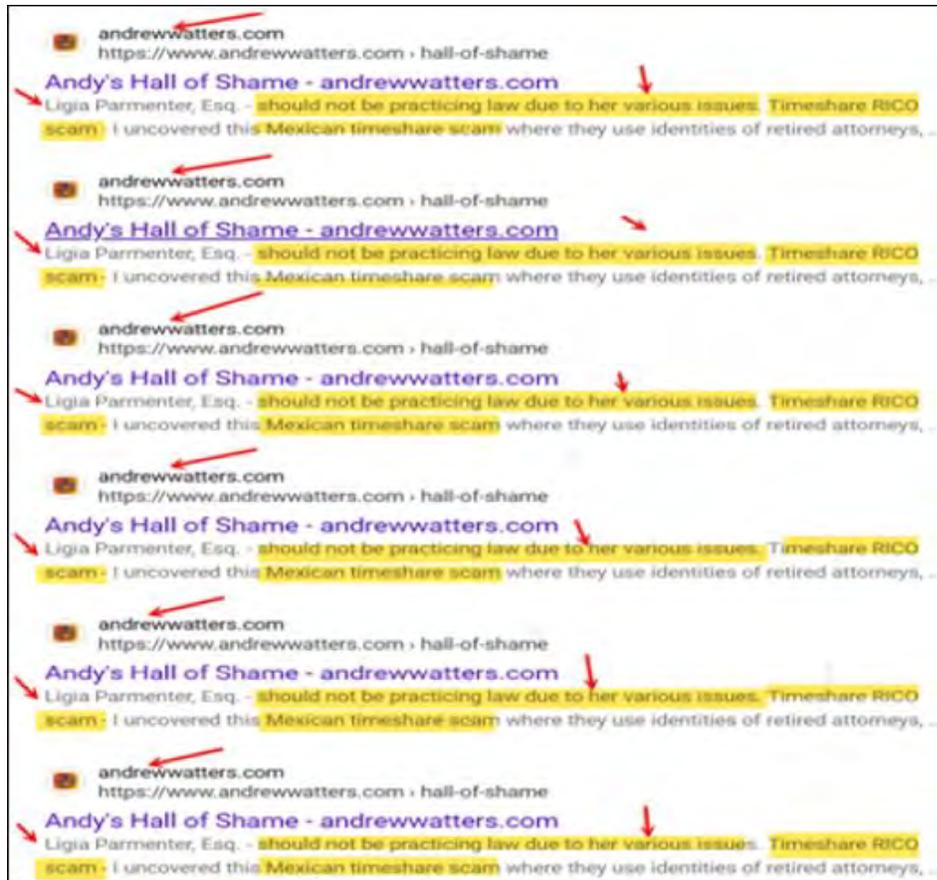
True and correct copy of Watters’ Snippets attached hereto as Exhibit 1-H.

4. **Exhibit 1-I** — Bing search result snippets originating from ChristinaWatters.com, published by Christina Chung Watters, who identifies herself as CFO of Watters’ law office and a California-licensed real estate broker.



1
2
3
4
5
6 The search result is dominated by Watters' defamatory and harassing Snippet(s).
7 True and correct copy Watters' worker/employee/LAW OFFICE CFO's Snippets attached
8 hereto as Exhibit 1-I.

9
10
11 **5. Exhibit 1-J** — Bing search results for “Ligia Parmenter, Esq.”
12 showing six (6) uninterrupted, back-to-back Watters-manufactured
13 defamatory Snippets, demonstrating unlawful electronic cyber-
14 harassment and search-engine manipulation (Cal. Penal Code §
15 653.2(a)–(c)(1)–(2)).



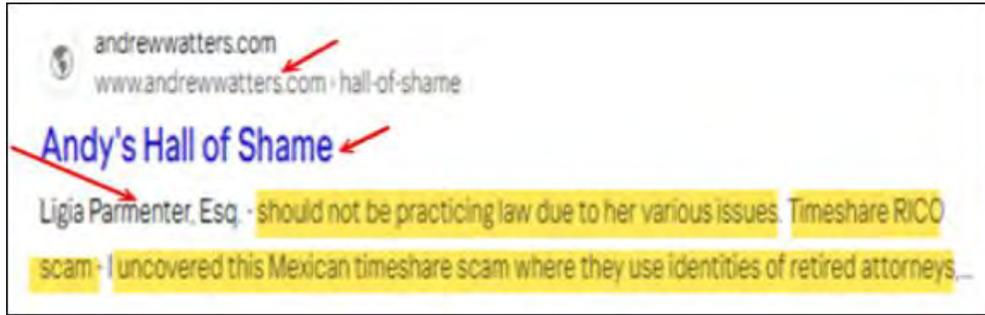
16
17
18
19
20
21
22
23
24
25
26
27 The search result is dominated by Watters' defamatory and harassing and continuous
28 Snippets. True and correct copy of Watters' Snippets attached hereto as Exhibit 1-J.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

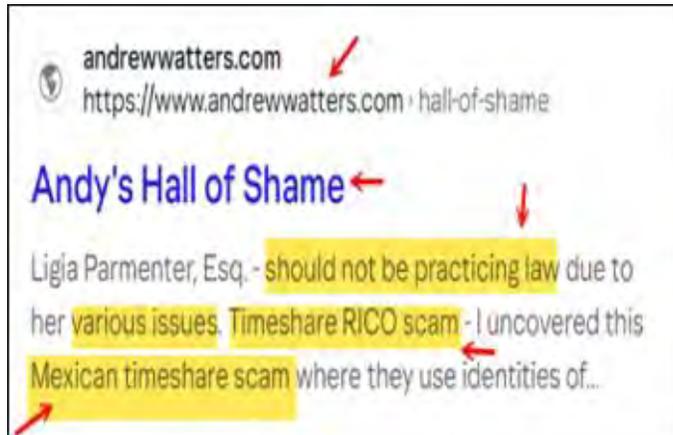
C. **YAHOO** — Defendant Watters’ manufactured defamatory Snippets appearing as top search results for “Ligia Parmenter, Esq.” through repeated, ongoing online publication.

1. **Exhibit 1-K** — Yahoo search result Snippets manufactured by Watters falsely accusing Plaintiff of RICO (Racketeer Influenced and Corrupt Organizations Act) criminality in Mexico and constituting electronic cyber-harassment (Cal. Penal Code § 653.2(a)–(c)(1)–(2)).

a) Laptop View of Yahoo Search



b) iPhone View of Yahoo Search



True and correct copy of Watters’ Snippets attached hereto as Exhibit 1-K.

D. **DUCKDUCKGO** — Watters’ manufactured defamatory Snippets appearing as top search results for “Ligia Parmenter, Esq.” through repeated, ongoing online publication.

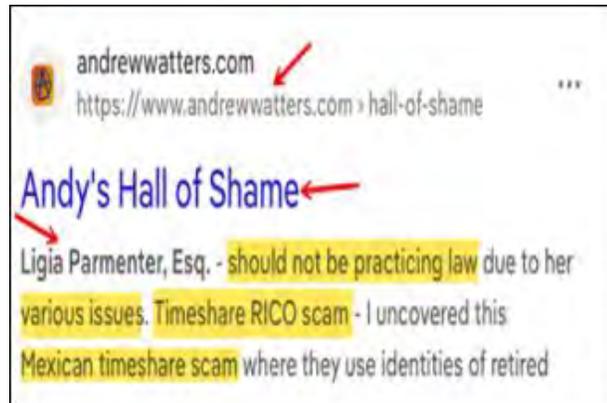
1. **Exhibit 1-L** — DuckDuckGo search result Snippets manufactured by Watters falsely accusing Plaintiff of RICO (Racketeer Influenced and Corrupt Organizations Act) criminality in Mexico and constituting electronic cyber-harassment (Cal. Penal Code § 653.2(a)–(c)(1)–(2)).

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

a) Laptop View of DuckDuckGo Search



b) iPhone View of DuckDuckGo Search



True and correct copy of Watters' Snippets attached hereto as Exhibit 1-L.

2. **Exhibit 1-M** — DuckDuckGo search result snippets manufactured by Watters falsely claiming that Plaintiff is intellectually deficient and mentally unstable, constituting electronic cyber-harassment (Cal. Penal Code § 653.2(a)–(c)(1)–(2)).

a) Laptop View of DuckDuckGo Search



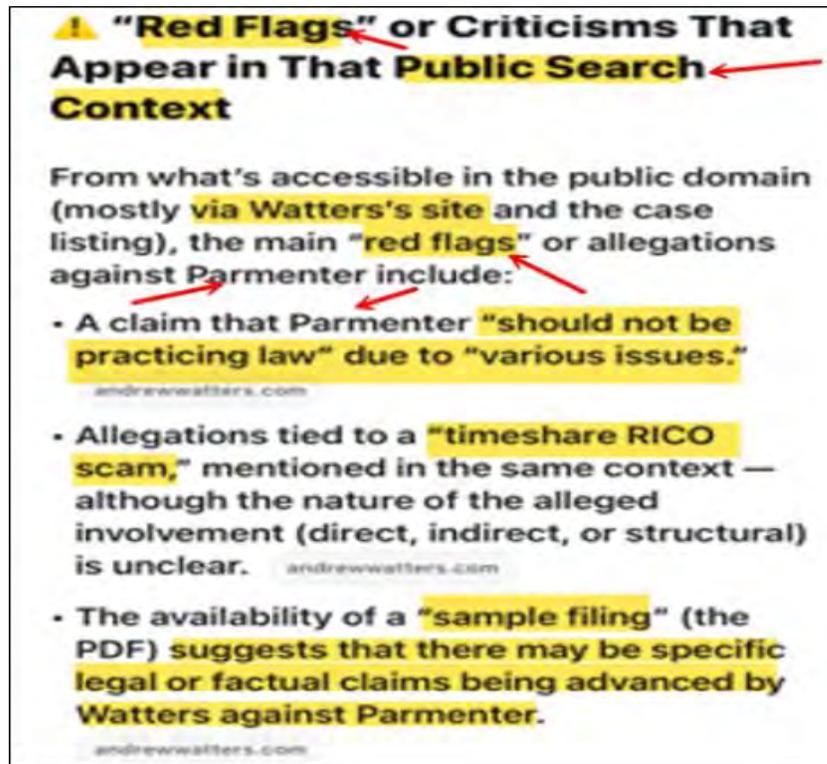
b) iPhone View of DuckDuckGo Search



True and correct copy of Watters’ Snippets attached hereto as Exhibit 1-M.

E. **Exhibit 1-N — ChatGPT-Generated “Red Flags”**

Artificially Public search content showing “red flags” appearing solely as a result of Watters’ electronic content manipulation and cyber-harassment campaign (Cal. Penal Code § 653.2(a)–(c)(1)–(2)).



Above is a “Red Flag” created by Watters for the public to read whenever “Ligia Parmenter” is searched on ChatGPT. Clicking on “andrewwatters.com” provides information about “Andrew Watters” lawyer services. True and correct copy attached hereto as Exhibit 1-N

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

F. Exhibit 1-O — Watters’ Defamatory Snippets - Source Identifiers — Favicon Attribution – Watters’ Law Office/ Legal Services_ Each search-engine Snippet displays Watters’ law-office Favicon, confirming the content originates from and is controlled by his commercial website, www.andrewwatters.com.



True and correct copy attached hereto as Exhibit 1-O

G. Exhibit 1-P — 7-Day Log of Defendant Watters’ 24/7 Cyber-Harassment and Cyber-Stalking via Search-Engine Weaponized Snippets of “Ligia Parmenter, Esq.”

Andrew <u>Watters</u> — Cyber-Stalking & Electronic Harassment 7-Day Cyber-Harassment & Cyber-Stalking Log Reporting Party: Ligia Parmenter, Esq., San Rafael, California			
Date	Time	Platform	Incident
Dec. 27, 2025	07:44	Google	Andrew Watters’ false-harassing snippets observed again- unwanted /nonconsensual
Dec. 27, 2025	07:38	Bing	Andrew Watters’ false-harassing snippets observed again- unwanted /nonconsensual
Dec. 27, 2025	07:41	Yahoo	Andrew Watters’ false-harassing snippets observed again- unwanted /nonconsensual
Dec. 27, 2025	07:43	DuckDuckGo	Andrew Watters’ false-harassing snippets observed again- unwanted /nonconsensual
Dec. 27, 2025	10:48	Google	Andrew Watters’ false-harassing snippets observed again- unwanted/ nonconsensual
Dec. 27, 2025	10:53	Bing	Andrew Watters’ false-harassing snippets observed again- unwanted/ nonconsensual
Dec. 27, 2025	10:58	Yahoo	Andrew Watters’ false-harassing snippets observed again- unwanted /nonconsensual
Dec. 27, 2025	11:03	DuckDuckGo	Andrew Watters’ false-harassing snippets observed again- unwanted/ nonconsensual
Dec. 27, 2025	14:17	Google	Andrew Watters’ false-harassing snippets observed again- unwanted/ nonconsensual

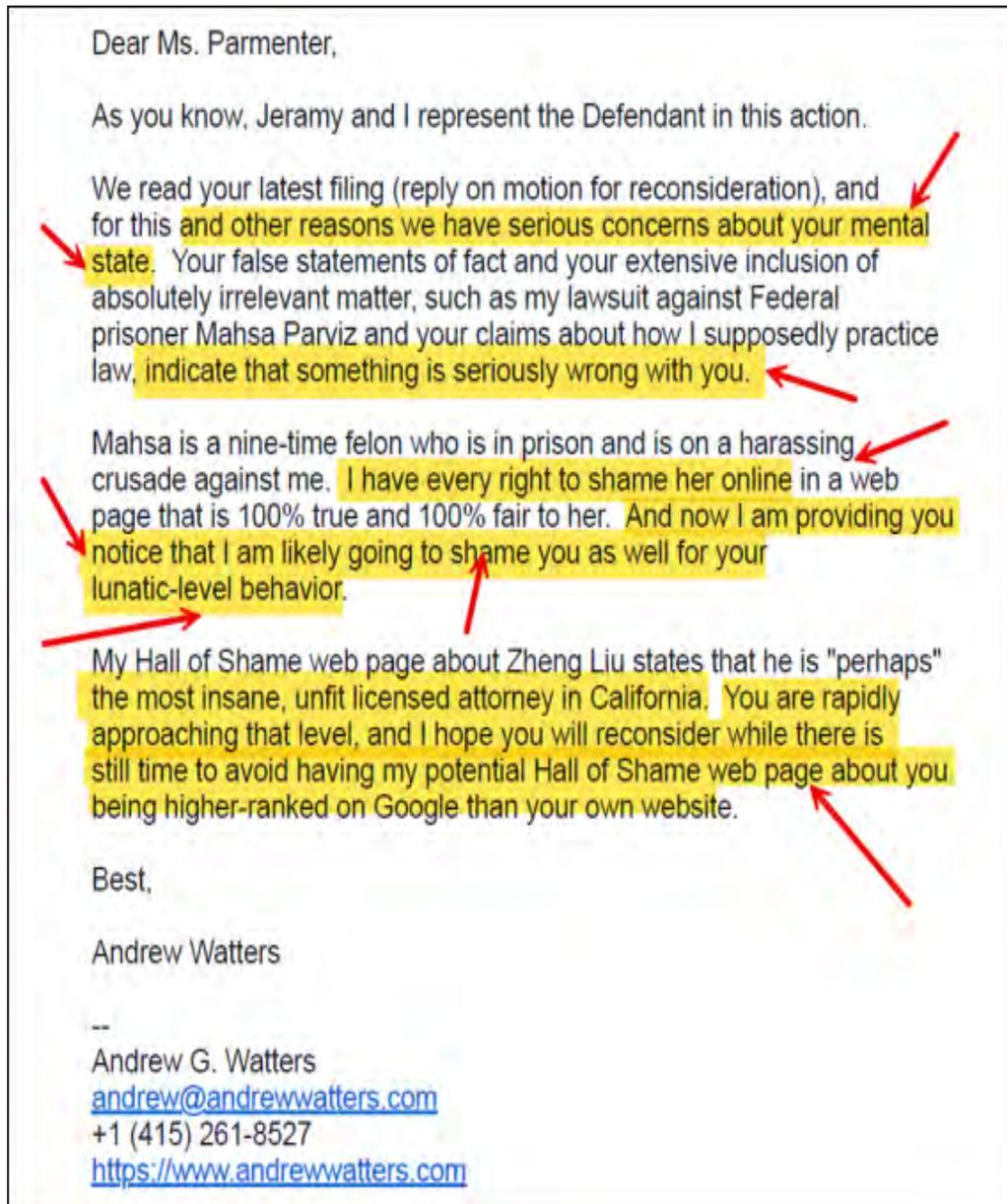
True and correct copy attached hereto as Exhibit 1-P

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

II. SECTION 2 —

Watters' September 19, 2023 threat to publicly shame Plaintiff as mentally unstable and lunatic lawyer and elevate defamatory content above her law-office webpages if she did not abandon a client, followed by ongoing threats of further cyber-harassment..

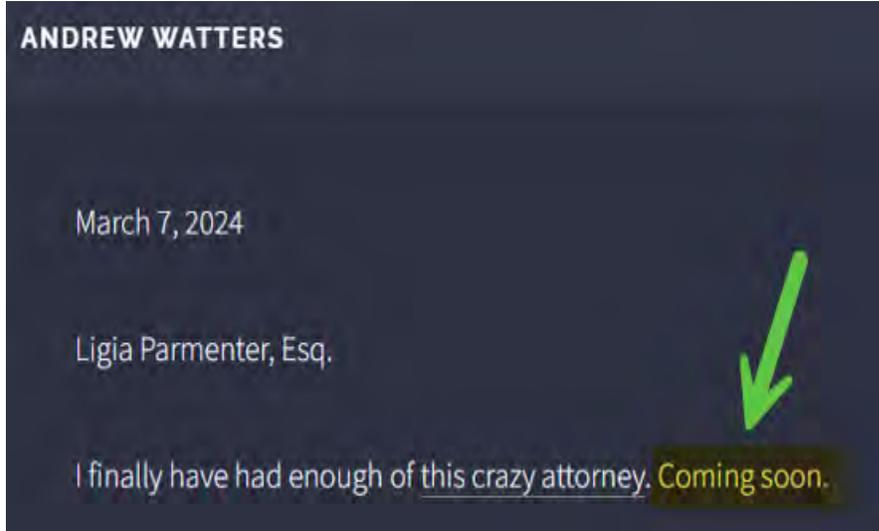
A. **Exhibit 2-A**— Watters' September 19, 2023 extortionate threat (Cal. Penal Code §§ 518, 519, 523(a)) demanding that Plaintiff abandon a client or face public shaming and electronic cyber-harassment (Cal. Penal Code § 653.2(a)–(c)(1)–(2)), including threats to dominate search-engine results above Plaintiff's law-office website.



True and correct copy of Watters' September 19, 2023 extortionate threat email, attached as **Exhibit 2-A** (see *Flatley v. Mauro* (2006) 39 Cal.4th 299).

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

B. Exhibit 2-B— March 7, 2024 website posting by Watters announcing “COMING SOON,” threatening additional defamatory and cyber-harassing publications targeting Plaintiff.



True and correct copy of screen-shot of Watters’ <https://www.andrewwatters.com/hall-of-shame/ligia-parmenter> Dated March 7, 2024 Where He Threatens more Defamation and Cyber-Harassment – ‘COMING SOON’ Attached hereto as Exhibit 2-B

C. Exhibit 2-C— Screenshot of Watters’ law-office branding (“Polite Gunfighter”) appearing alongside “Hall of Shame” content, submitted solely to demonstrate the intimidating context contributing to Plaintiff’s reasonable and sustained fear for personal safety, and not as a basis for defamation, firearm-related liability, or any independent claim.



True and correct copy of Watters’ Firearm Threat Communication at www.andrewwatters.com Attached hereto as Exhibit 2-C.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

D. Exhibit 2-D— Screenshot of firearm-related imagery used in Watters’ law-practice materials, submitted solely to demonstrate the intimidating context contributing to Plaintiff’s reasonable and sustained fear for personal safety, and not as a basis for defamation, firearm-related liability, or any independent claim.



True and correct copy of Watters’ high-powered firearm depiction archived from date of December 25, 2024 at <https://web.archive.org/web/20241225155319/https://www.politegunfighter.com/> Attached hereto as Exhibit 2-D.

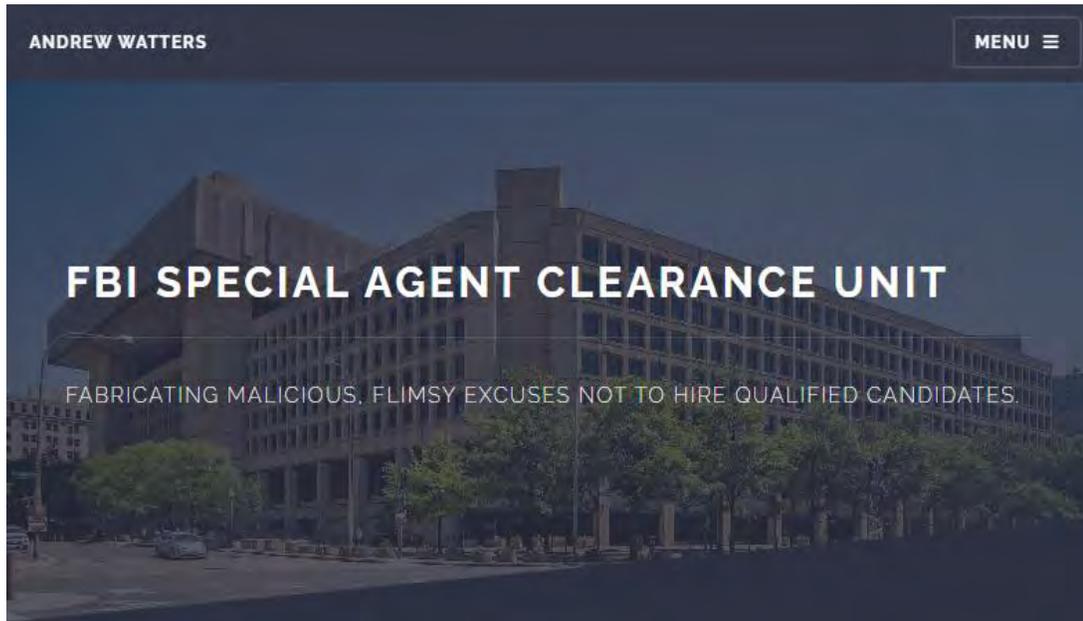
E. Exhibit 2-E— Screenshot showing Watters’ use of an unauthorized FBI seal on his “Hall of Shame” webpage, submitted solely to demonstrate the intimidating context and implied authority contributing to Plaintiff’s reasonable fear, and not as a basis for defamation, government-impersonation liability, or any independent claim.



True and correct copy Attached hereto as Exhibit 2-E.

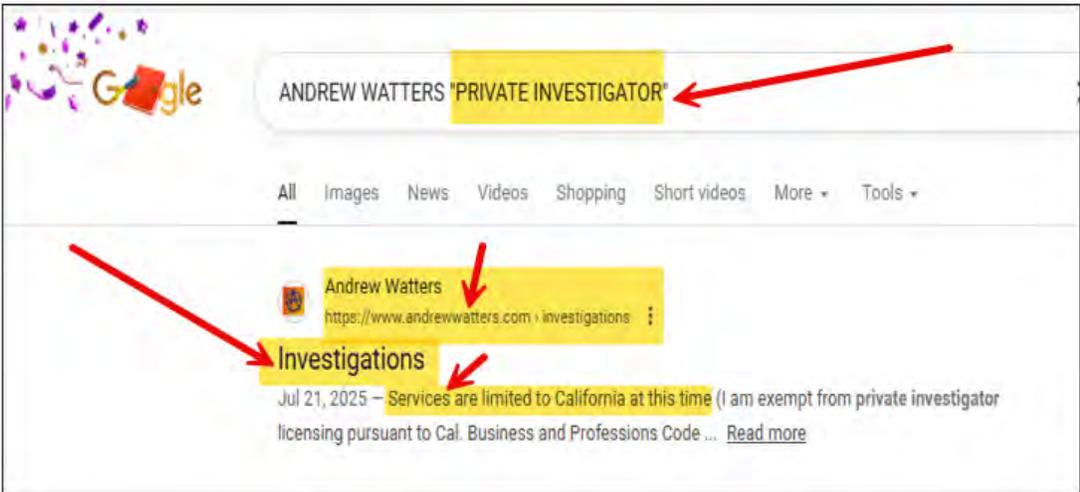
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

F. Exhibit 2-F— Screenshot of a badge-style statement published by Watters styled as “FBI Special Agent Clearance Unit,” submitted solely to demonstrate the intimidating context and implied investigative authority contributing to Plaintiff’s reasonable fear, and not as a basis for defamation, licensing, or any independent claim.



Building In Background Is FBI Headquarters (J. Edgar Hoover Building) in Washington, D.C. True and correct copy Attached hereto as Exhibit 2-F.

G. Exhibit 2-G— Google search result snippets advertising Watters’ “private investigations” services without private-investigator licensure, submitted solely to show misleading and unlawful advertising context contributing to intimidation, and not as an independent claim.



True and correct copy Attached hereto as Exhibit 2-G.

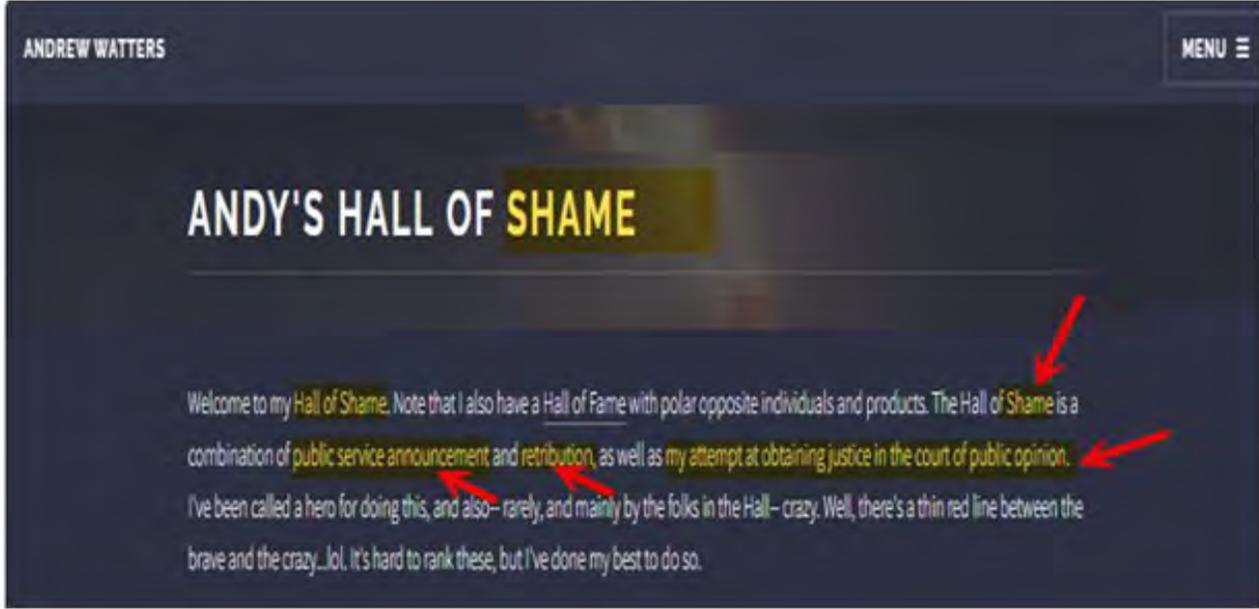
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

H. Exhibit 2-H— True and correct screenshot of Watters’ “Investigations” webpage advertising cyber-investigation and private-investigator services without licensure under the Private Investigator Act and implying federal law-enforcement affiliations, submitted solely to show misleading and unlawful advertising context, and not as an independent claim.



<https://www.andrewwatters.com/investigations/> True and correct copy Attached hereto as Exhibit 2-H

I. Exhibit 2-I— Watters’ public statements admitting that his “Hall of Shame” is used as a tool of **retribution** and **public targeting /shaming**, including prioritizing and ranking individuals for exposure, contradicting his claim that it serves a public-service purpose.



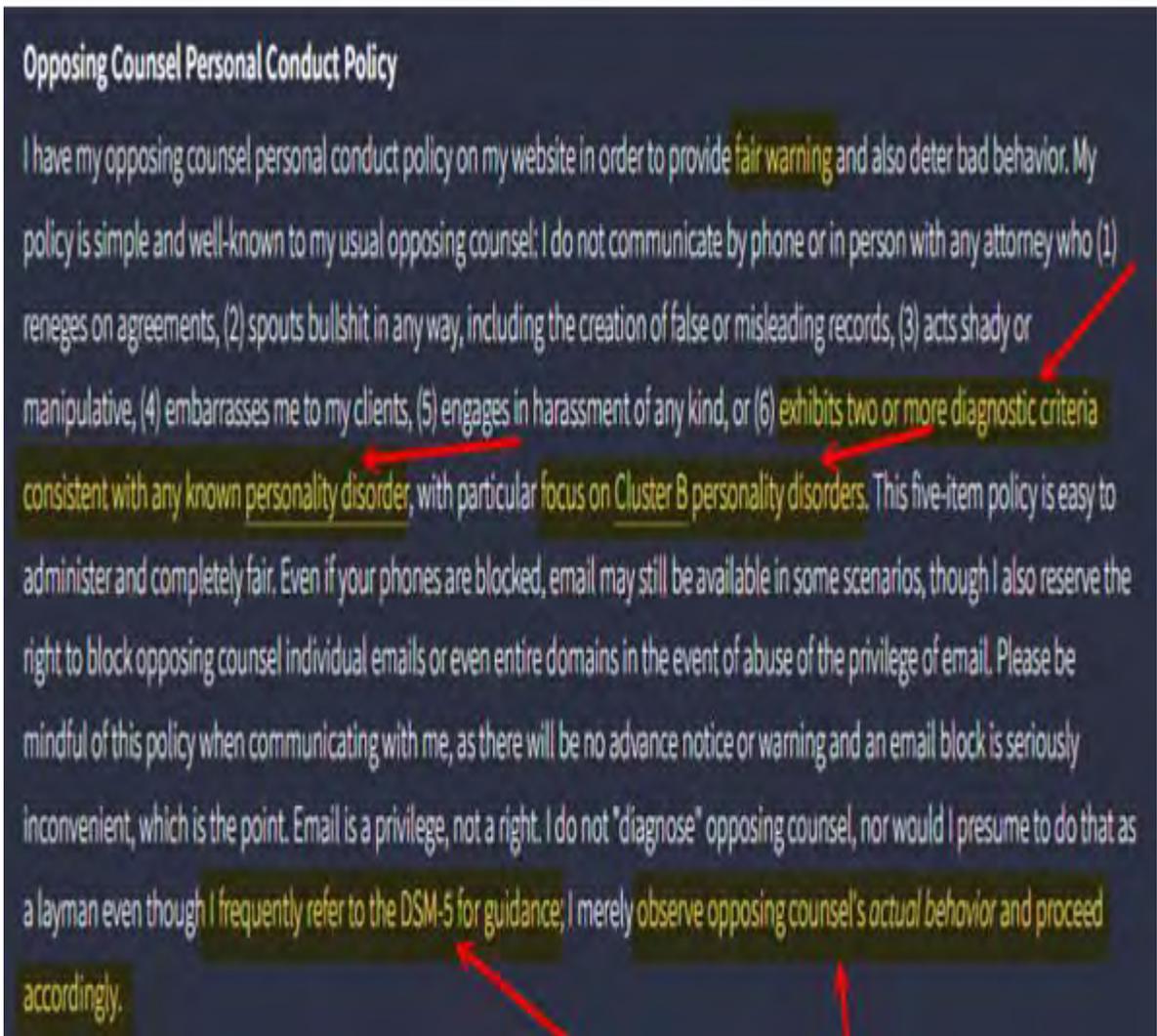
True and correct copy Attached hereto as Exhibit 2-I.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

III. SECTION 3 —

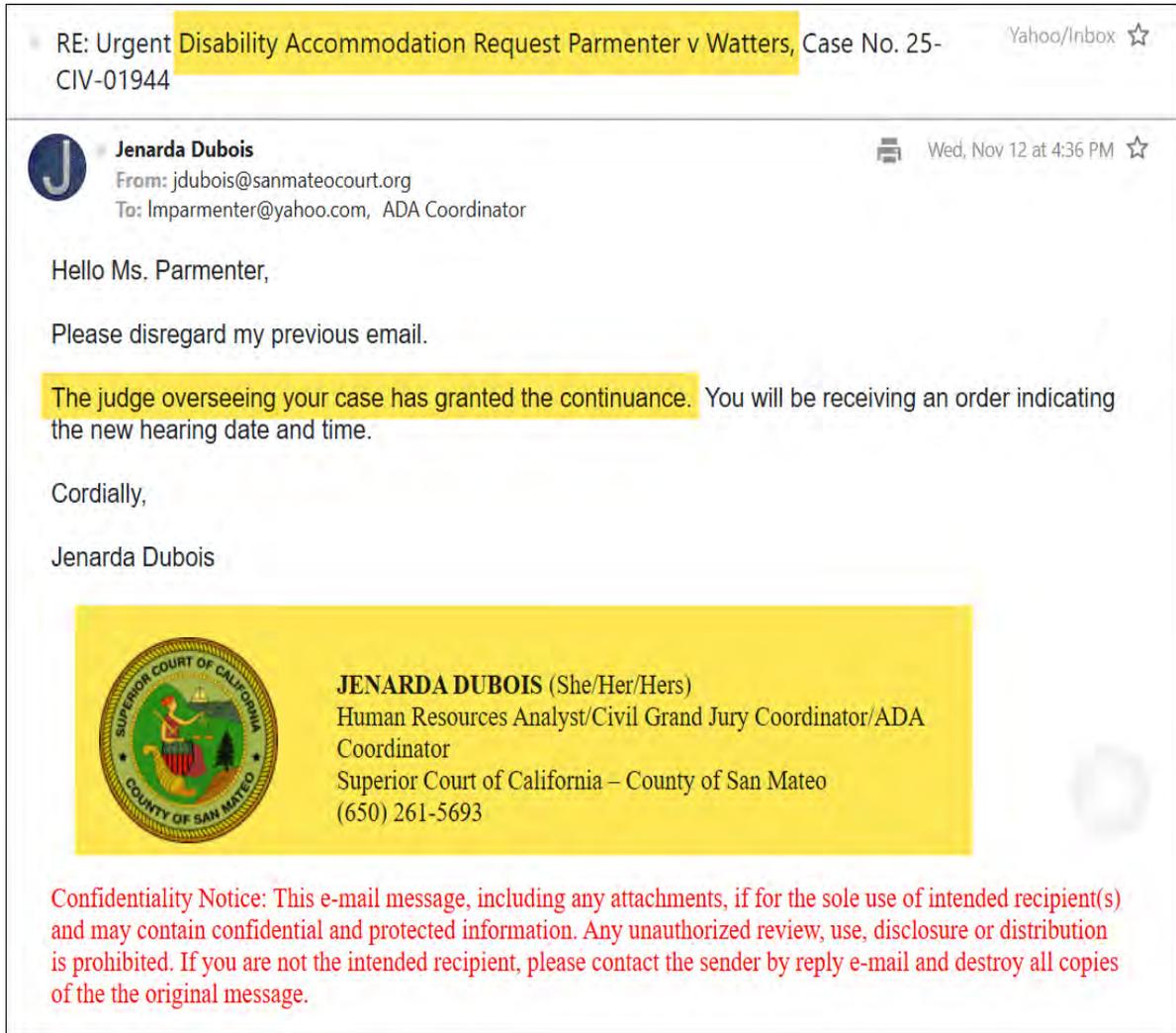
Evidence of Watters’ cyber-harassment targeting Plaintiff based on perceived mental disability and perceived race, invoking disability- and bias-based conduct (Cal. Penal Code §§ 653.2, 422.55(a)(1)–(2); ADA; Cal. Gov. Code § 12926.1).

A. Exhibit 3-A— Watters’ “Personal Conduct” orders targeting attorneys he labels as mentally disabled, including references to mental illness and DSM-5 diagnoses, and threatening professional harm, cross-referenced to his September 19, 2023 extortionate threat letter (Exhibit 2-A), submitted solely to show intimidation, escalation, and Plaintiff’s objectively reasonable fear of future harm, not as an independent claim or defamation basis.



Attached hereto as Exhibit 3-A.

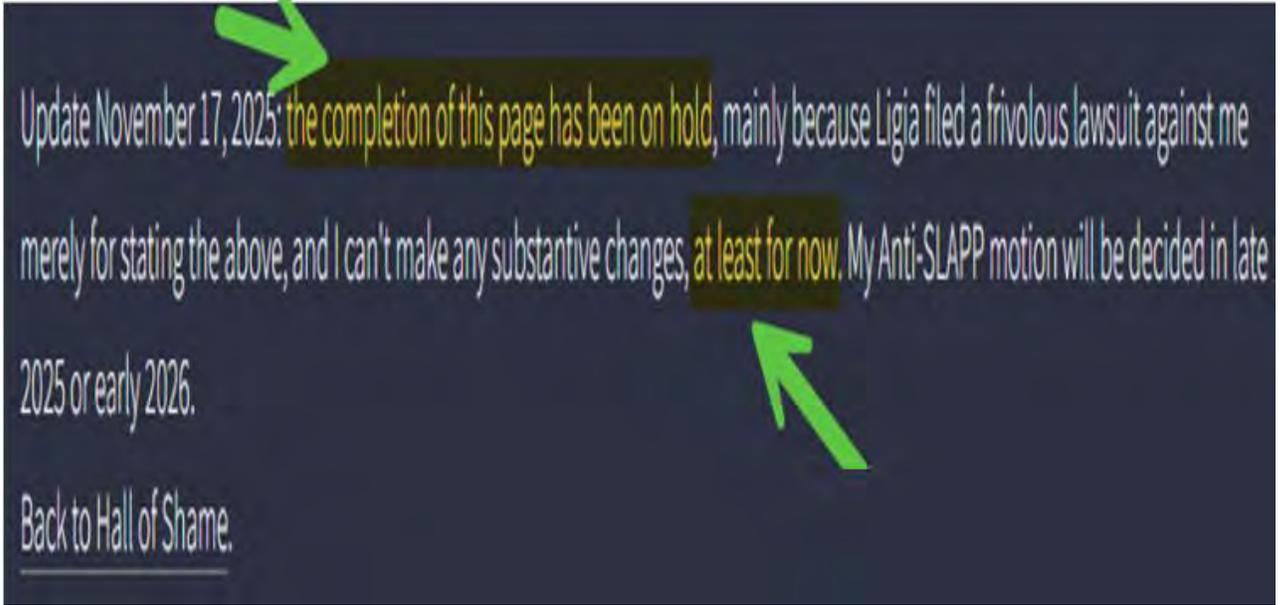
1 **B. Exhibit 3-B**— Evidence showing that Defendant Watters’ cyber-harassment
2 caused documented emotional harm requiring an ADA-based court
3 accommodation, submitted solely to demonstrate intimidation, escalation, and
4 Plaintiff’s reasonable fear of future harm.



25 Attached hereto as Exhibit 3-B.

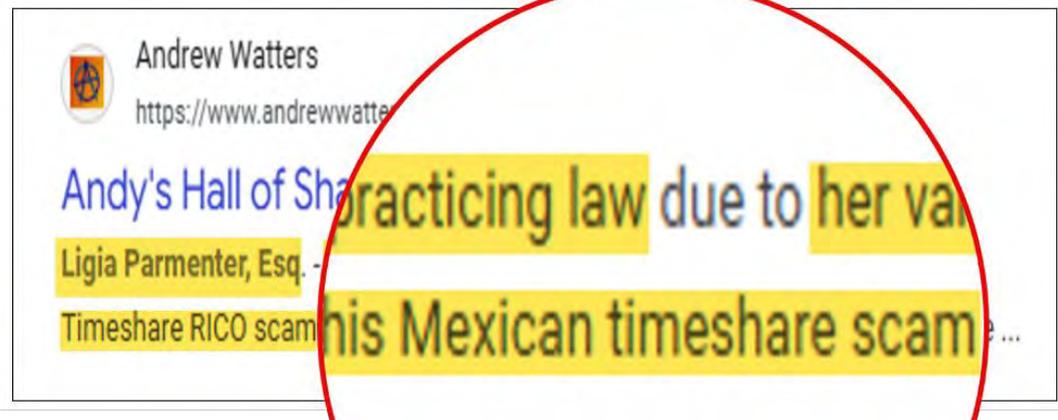
26 **C. Exhibit 3-C**— November 17, 2025 website update by Watters threatening
27 continued harm and cyber-harassment in retaliation for the Superior Court of
28 San Mateo’s grant of an ADA accommodation, submitted to document stalking,
 retaliation, and Plaintiff’s reasonable fear of future intimidation and harm.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28



True and correct copy of Watters’ November 17, 2025 Threat Communication Of More Cyber-Harassment and More Cyber-Stalking To Come Attached hereto as Exhibit 3-C.

D. Exhibit 3-D— False statements by Defendant Andrew Watters alleging a “Mexico RICO timeshare scam,” offered to demonstrate racially targeted defamatory conduct directed at Plaintiff as a Latina attorney.

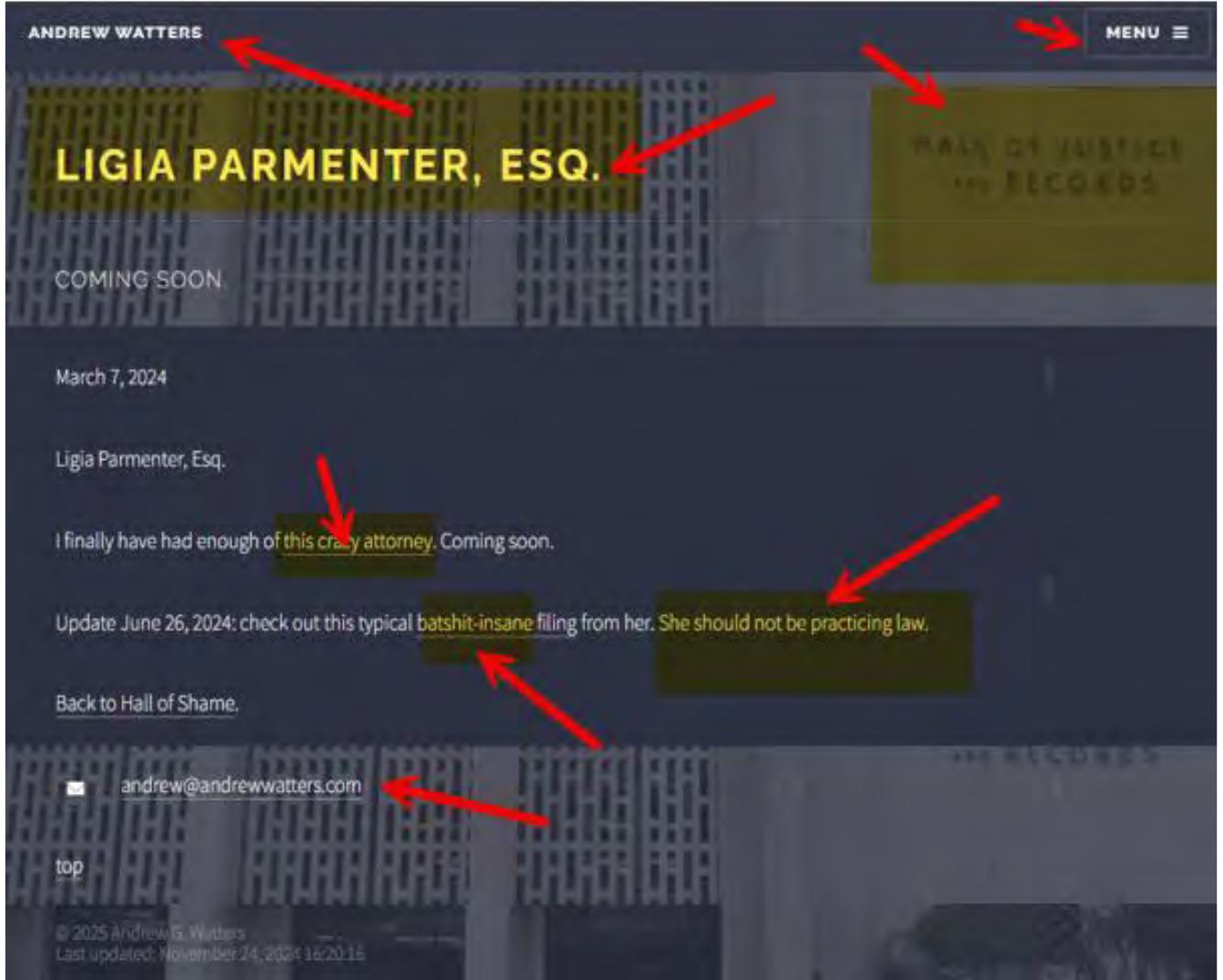


Attached hereto as Exhibit 3-D.

IV. SECTION 4 —

Watters’ “Hall of Shame” webpage on his law-office website used to publish and disseminate false statements about Plaintiff across major search platforms – Google, Bing, Yahoo, DuckDuckGo, ChatGPT - on a continuous basis.

A. Exhibit 4-A— Screenshot of Watters’ “Hall of Shame” webpage displaying Plaintiff’s name prominently as the headline on his law-office website, evidencing intentional public targeting through continuous online publication.

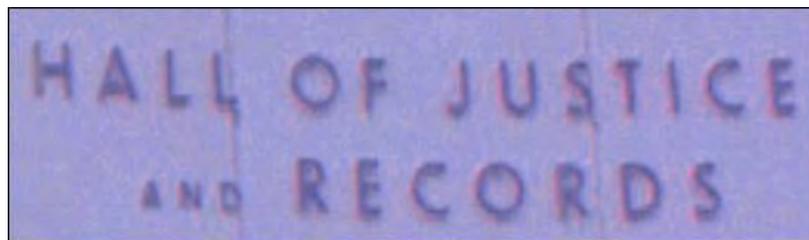


True and correct copy of screen-shot at Watters' Law Office Website:

[https://www.andrewwatters.com/hall-of-shame/ligia-parmenter](https://www.andrewwatters.com/hall-of-shame/<u>ligia-parmenter</u>)

True and correct copy attached hereto as Exhibit 4-A.

B. Exhibit 4-B— Screenshot showing Watters' use of a "Hall of Justice and Records" emblem adjacent to false defamatory statements about Plaintiff, misrepresenting them as court-sanctioned findings.



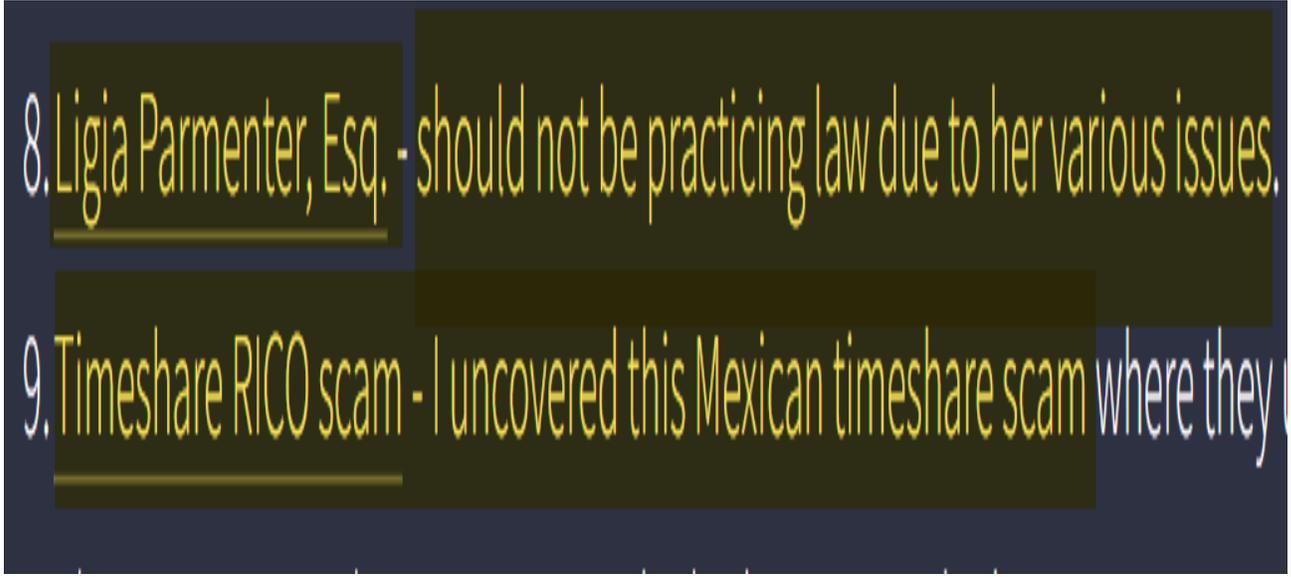
True and correct copy of screen-shot at Watters' Law Office Website:

[https://www.andrewwatters.com/hall-of-shame/ligia-parmenter](https://www.andrewwatters.com/hall-of-shame/<u>ligia-parmenter</u>)

True and correct copy attached hereto as Exhibit 4-B.

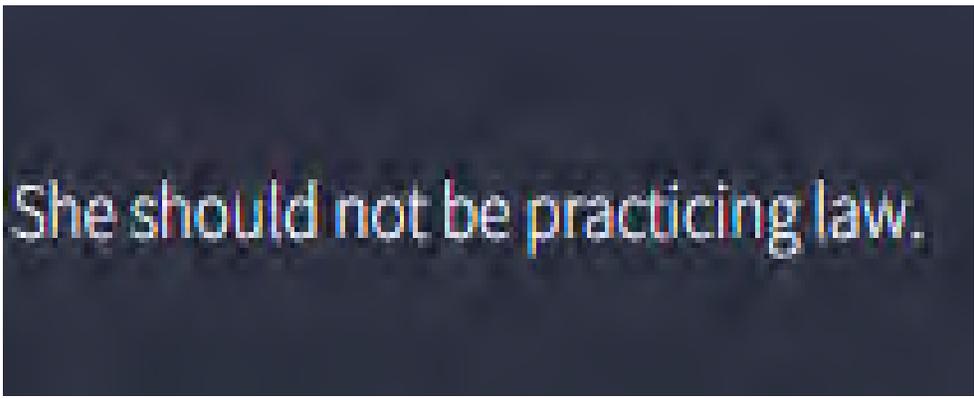
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

C. **Exhibit 4-C**— False and defamatory per se statements deliberately placed together by Watters on his “Hall of Shame” to generate false statements of fact Snippets – (see above) across Google, Bing, Yahoo, DuckDuckGo, and ChatGPT search results portraying Plaintiff as a criminal RICO Racketeer Influenced and Corrupt Organizations Act in “Mexico” and a time share scammer.



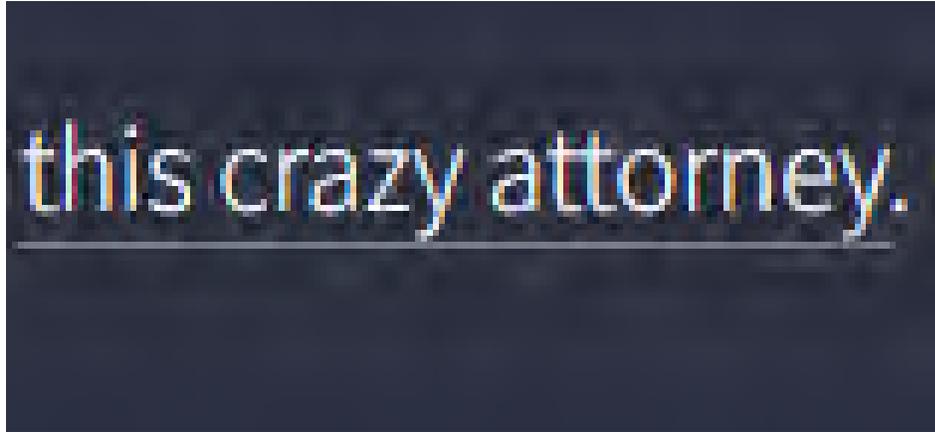
True and correct copy of screen-shot at Watters’ Law Office Website:
<https://www.andrewwatters.com/hall-of-shame/>
True and correct copy attached hereto as Exhibit 4-C.

D. **Exhibit 4-D**— False and defamatory per se statement published by Watters asserting that Plaintiff “should not be practicing law” and is engaged in unlawful practice of law, used to dominate search-engine snippets.



True and correct copy of screen-shot at Andrew Watters’ Law Office Website:
<https://www.andrewwatters.com/hall-of-shame/ligia-parmenter>
Attached hereto as Exhibit 4-D

1 E. **Exhibit 4-E**— False and defamatory per se statement published by Watters
2 asserting that Plaintiff is mentally deficient and mentally unstable, used to
3 dominate search-engine snippets.



10 Note: The underlining shown in the screenshot was added by Watters, the author and
11 publisher of the webpage, and was present at the time the screenshot was captured. The
12 underlined text contains a live hyperlink used by Watters to identify and dox Plaintiff.

- 13 - True and correct screenshot from Watters’ law-office website,
14 <https://www.andrewwatters.com/hall-of-shame/ligia-parmenter> attached as Exhibit 4-E.

15
16
17
18
19
20
21
22
23
24
25
26
27
28

1. **Exhibit 4-E-1.** — Screenshot showing Watters’ photo-doxing of Plaintiff on his “Hall of Shame” webpage, including underlined text and a hyperlink directing to Plaintiff’s law-office webpage with her photograph.



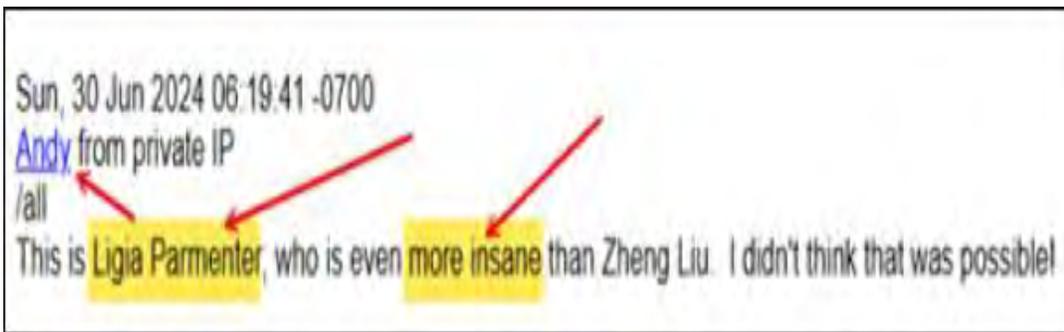
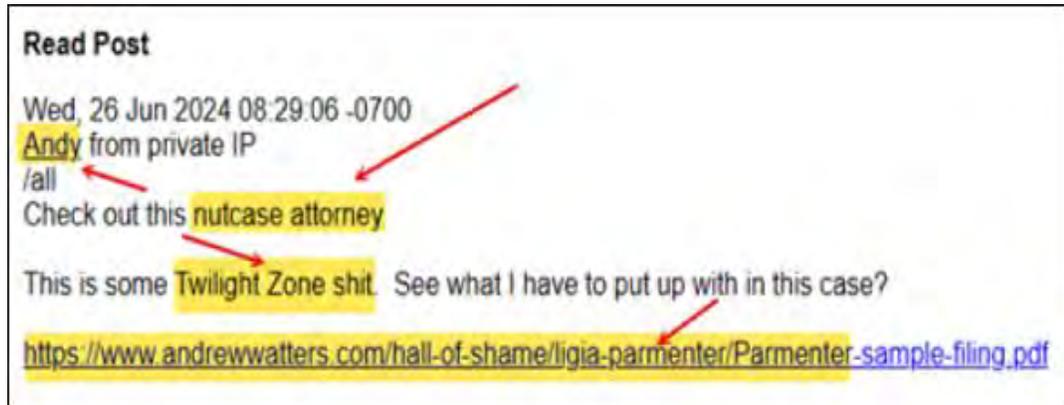
Attached hereto as Exhibit 4-E-1.

1 **F. Exhibit 4-F**— False and defamatory per se statement published by Watters
2 asserting that Plaintiff is unlawfully practicing law and is mentally deficient
3 and mentally unstable, used to dominate search-engine snippets.

4
5 batshit-insane filing from her. She should not be practicing law.

6
7
8
9
10 True and correct screenshot of Watters’ “Hall of Shame” webpage for Plaintiff, showing
11 underlining added by Defendant, attached as Exhibit 4-F.

12 **G. Exhibit 4-G**— Evidence showing Watters publishing false and harassing
13 statements about Plaintiff on the secondary website “JD Underground”
14 (www.slash.law), including claims that Plaintiff is mentally unstable and
15 unlawfully practicing law.



28 True and correct copy of screen-shot at Watters’ Law Office Website – JDUnderground
https://slash.law/jdu/read.php?post=../posts/all/1719415746-112.txt
Attached hereto as Exhibit 4-G

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

V. SECTION 5 —

Defendant Watters’ Commercial Law-Firm Domain And Defamatory Marketing Infrastructure: Evidence establishing that www.andrewwatters.com is a commercial law-office website, that the “Hall of Shame” is a core attorney-marketing feature designed for search visibility, and that Defendant’s publications constitute commercial speech rather than personal or litigation-privileged commentary.

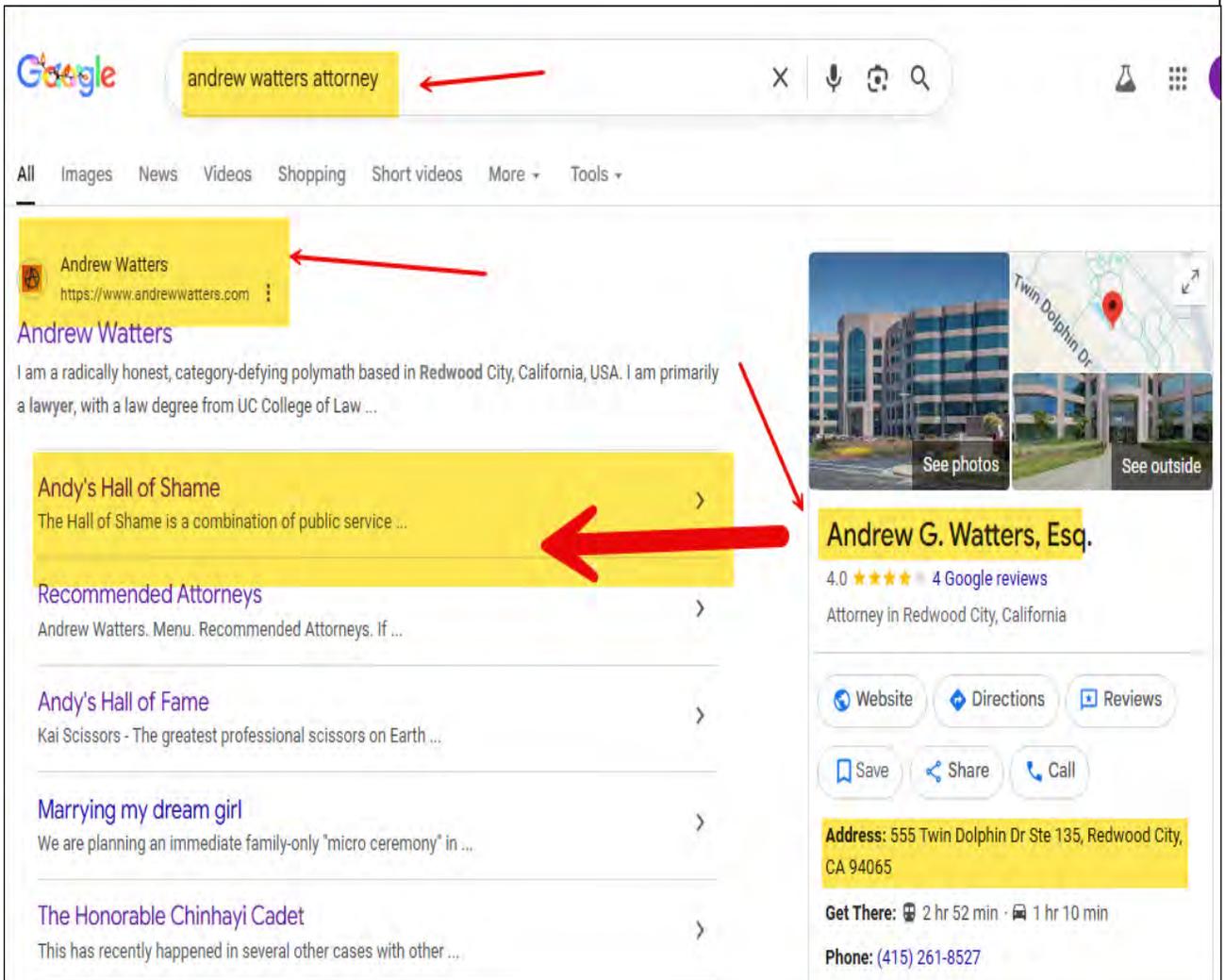
A. Exhibit 5-A— Photograph showing Watters working at a multi-monitor workstation associated with www.andrewwatters.com, offered to demonstrate his direct operational control over the website and its published content.



Attached hereto as Exhibit 5-A

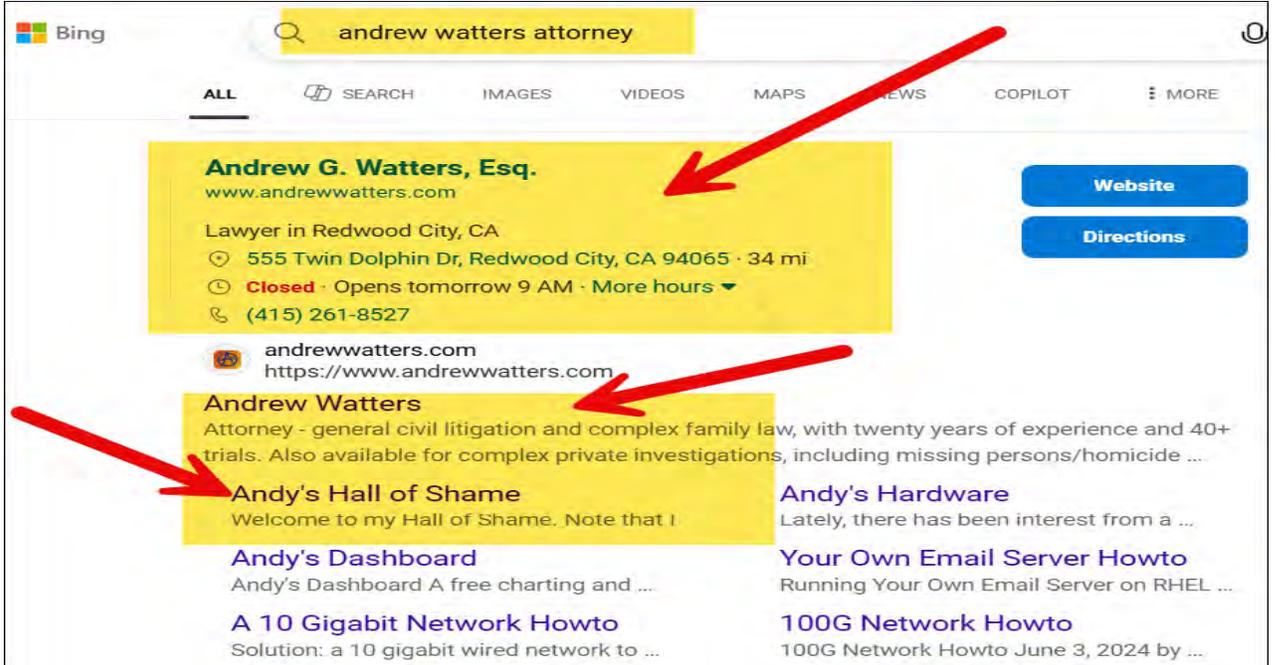
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

B. Exhibit 5-B— Search-engine results for “Andrew Watters attorney” showing Defendant’s “Hall of Shame” webpage as the primary result, demonstrating its role as the commercial centerpiece of his law-office marketing website.



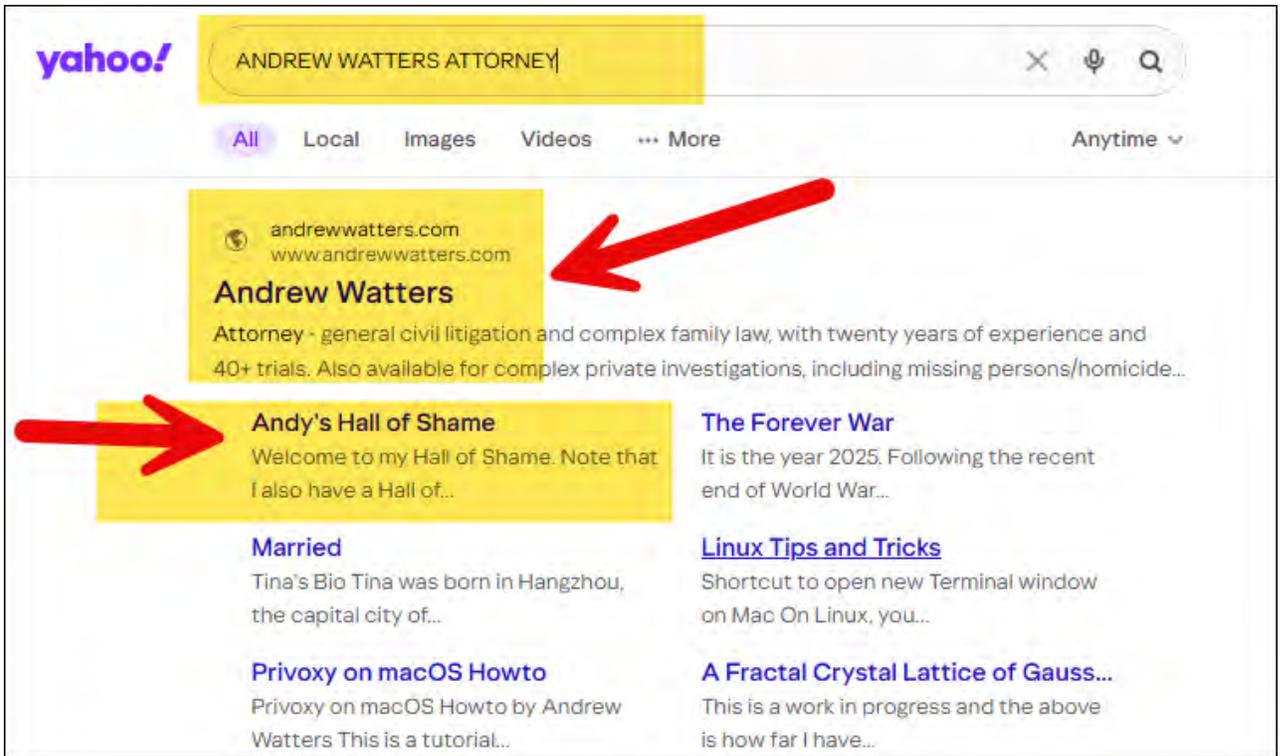
Attached hereto as Exhibit 5-B.

C. Exhibit 5-C— Bing search results for “Andrew Watters attorney” showing his “Hall of Shame” webpage as the primary result, demonstrating its role as the cornerstone of his law-office marketing website.



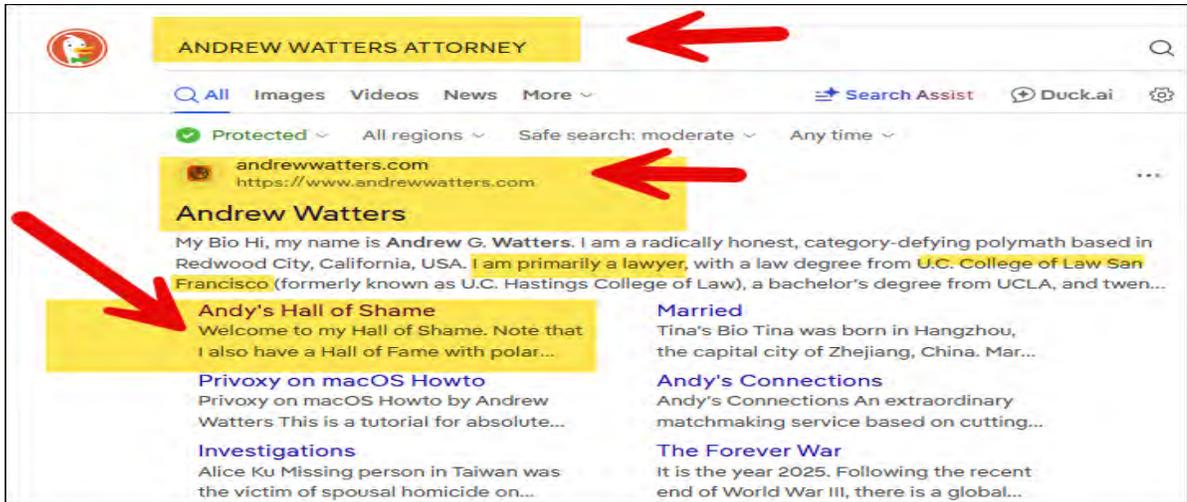
12 Attached hereto as Exhibit 5-C.

13 **D. Exhibit 5-D**— Yahoo search results for “Andrew Watters attorney”
14 showing his “Hall of Shame” webpage as the primary result, demonstrating its
15 role as the cornerstone of his law-office marketing website.



28 Attached hereto as Exhibit 5-D.

1 E. **Exhibit 5-E**— DuckDuckGo search results for “Andrew Watters attorney”
2 showing his “Hall of Shame” webpage as the primary result, demonstrating its
3 role as the cornerstone of his law-office marketing website.



4 Attached hereto as Exhibit 5-E.

5 F. **Exhibit 5-F**— Screenshot of Watters’ law-office website showing his
6 professional headshot, attorney biography, credentials, and promotion of legal
7 services, establishing the commercial and attorney-advertising nature of the
8 website.



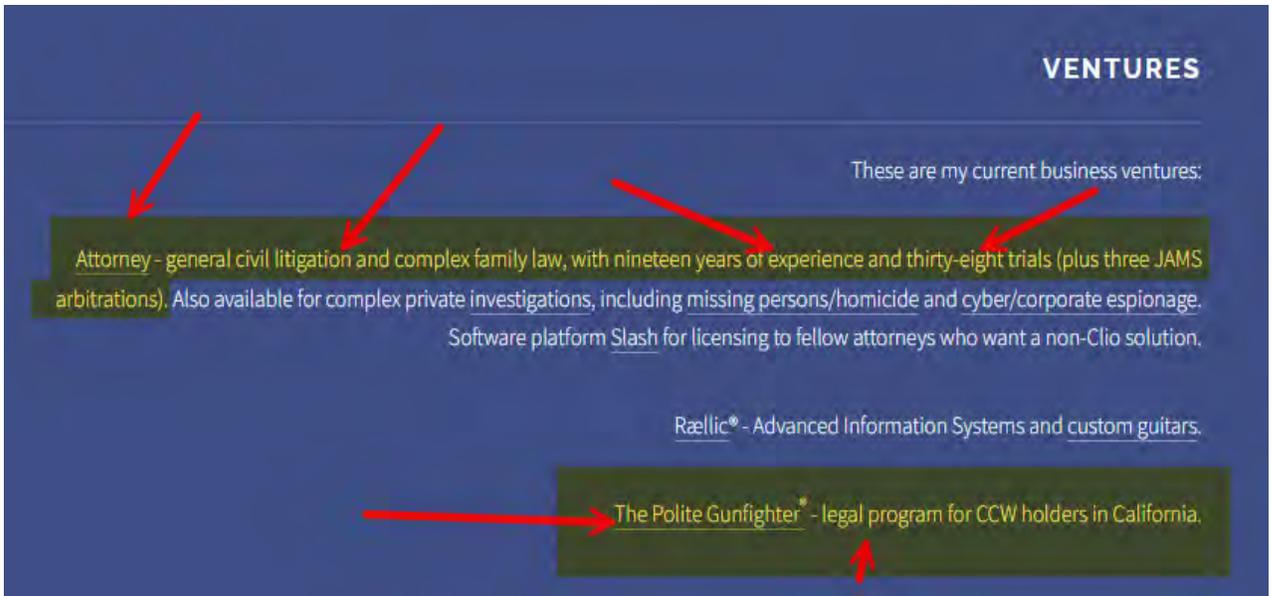
9 Attached hereto as Exhibit 5-F.

1 G. **Exhibit 5-G**— Archived capture of www.AndrewWatters.com showing a
2 branded law-firm website used to promote Defendant’s legal services and
3 credentials, confirming its commercial and attorney-advertising nature.



14 Attached hereto as Exhibit 5-G.

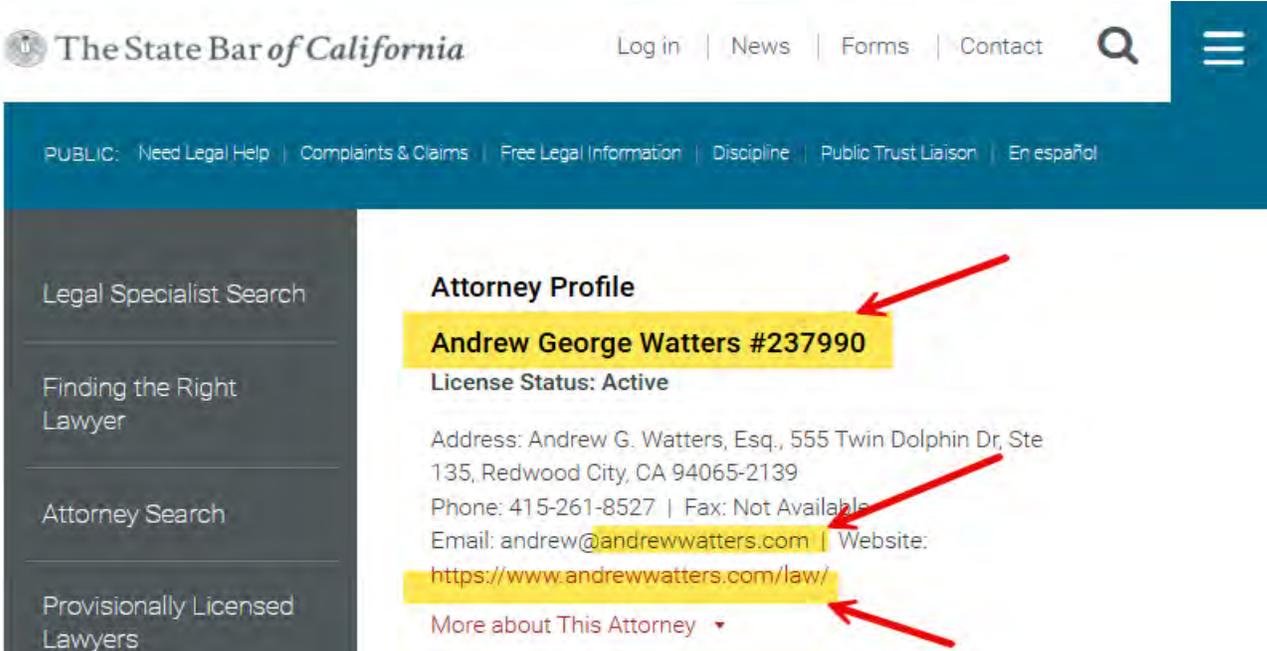
15 H. **Exhibit 5-H**— Screenshot of www.andrewwatters.com identifying the
16 domain as Defendant’s law-firm website used to market legal services, not a
17 personal blog or private forum.



28 Attached hereto as Exhibit 5-H.

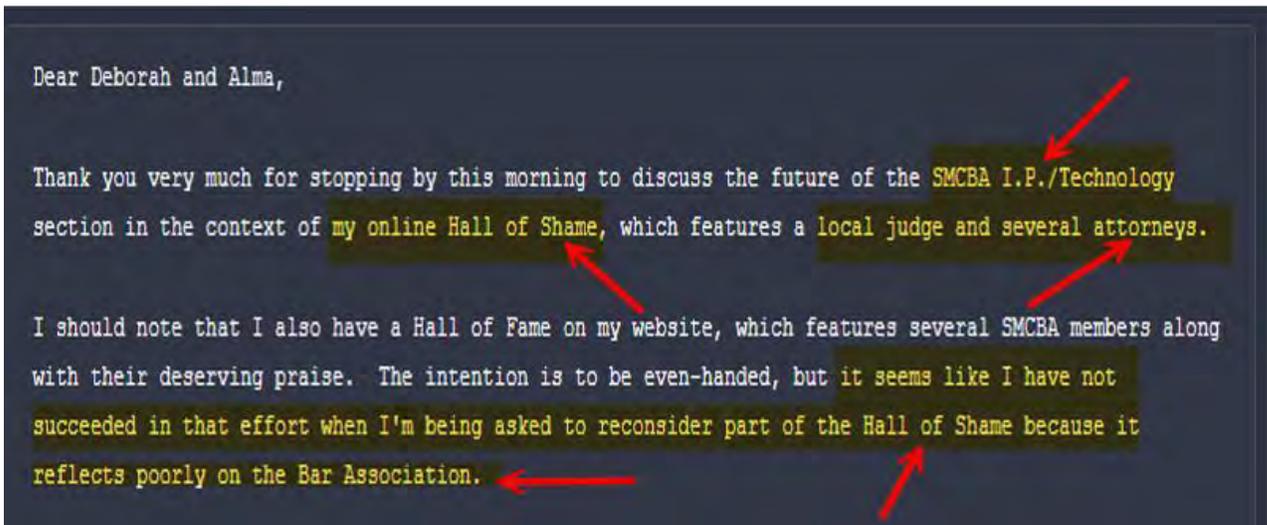
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

I. **Exhibit 5-I**— State Bar of California Record for Watters clearly identifying www.AndrewWatters.com (www.andrewwatters.com/hall-of-shame/) as his law office website.



Attached hereto as Exhibit 5-I.

J. **Exhibit 5-J**— San Mateo County Bar Association forced resignation letter dated March 14, 2025, requiring Watters’ resignation based on “Hall of Shame” content published on www.andrewwatters.com/hall-of-shame/, confirming the “Hall of Shame” as his principal attorney-advertising feature and not a personal endeavor as Watters attempts to repeatedly misrepresent.



Attached hereto as Exhibit 5-J.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

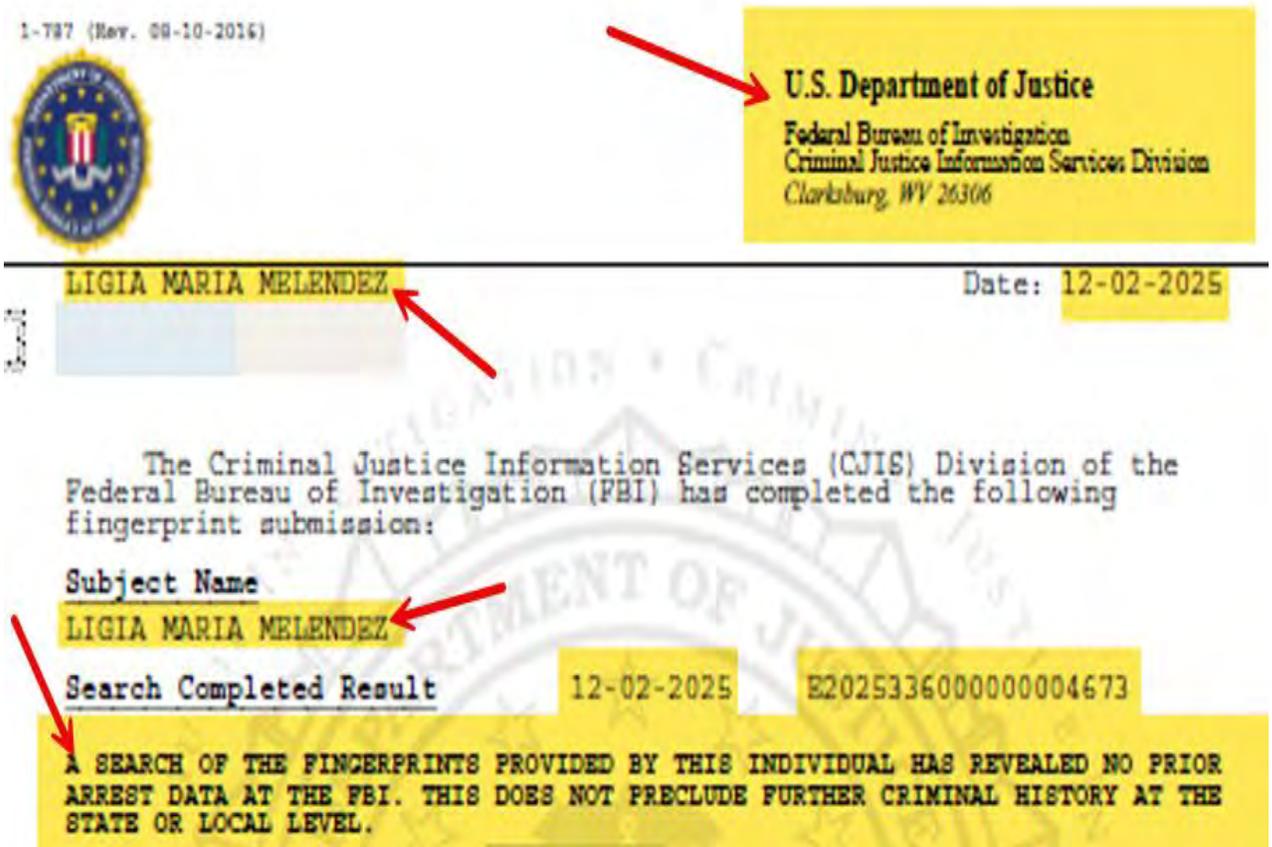
VI. SECTION 6 —

Evidence of Watters’ Knowing Falsity & Malice — All Statements by Defendant Watters Regarding “Ligia Parmenter, Esq.” Are Demonstrably False

A. “Ligia Parmenter, Esq.” is not a RICO racketeering criminal in Mexico or a “Timeshare Scammer”

Plaintiff affirms that she has never been investigated, charged, or involved in any RICO activity or timeshare scam in Mexico or elsewhere, and that Defendant’s statements to the contrary are false.

1. Exhibit 6-A-1 — True and correct copy of an FBI clearance letter confirming that Plaintiff (legal name: Ligia Maria Melendez) has no federal criminal record and has never been investigated or implicated in any criminal enterprise, including RICO activity.



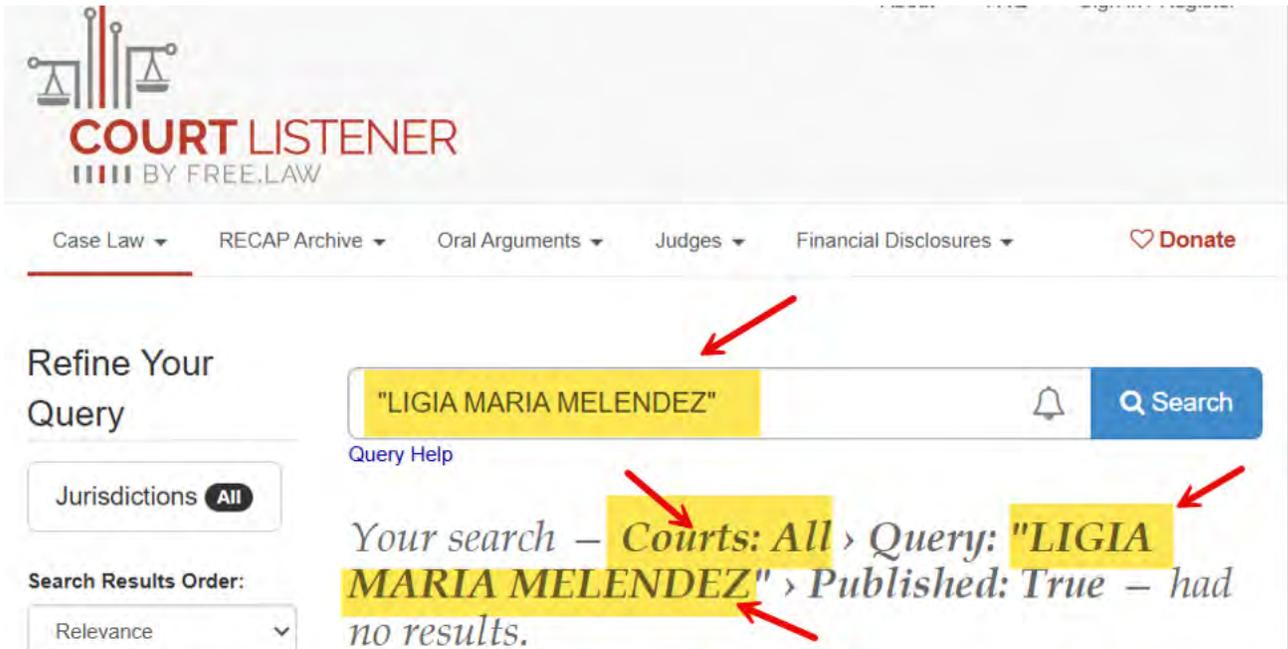
Attached hereto as Exhibit 6-A-1.

2. Exhibit 6-A-2 — True and correct copy of Plaintiff’s valid U.S. passport and travel records (legal name: Ligia Maria Melendez), offered to authenticate identity and lawful travel history and to rebut Defendant’s false claims of criminal activity in Mexico.



Attached hereto as Exhibit 6-A-2.

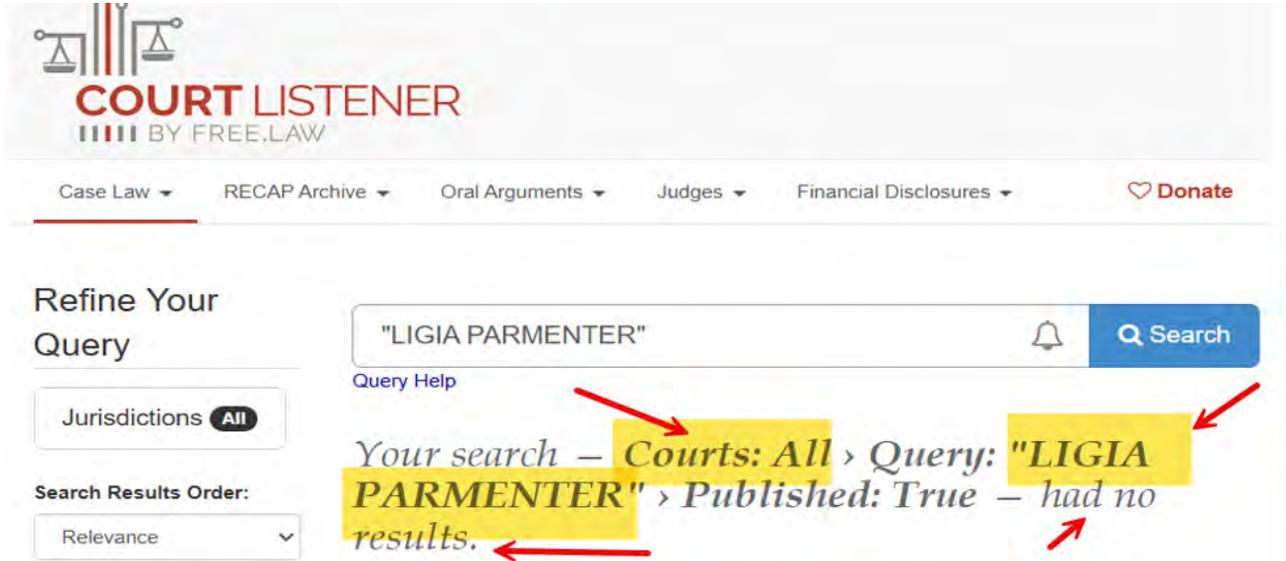
3. **Exhibit 6-A-3** — True and correct screenshot of a federal criminal case name search for “Ligia Maria Melendez” showing no criminal dockets, charges, or investigations, offered to rebut Defendant’s false criminal accusations.



Attached hereto as Exhibit 6-A-3.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

4. **Exhibit 6-A-4** — True and correct screenshot of a federal criminal case name search for “Ligia Parmenter” showing no criminal dockets, charges, or investigations, offered to rebut Defendant’s false criminal accusations.



Attached hereto as Exhibit 6-A-4.

B. Plaintiff is a licensed California attorney in good standing operating a legitimate law practice, and Defendant Watters’ statements asserting unauthorized practice of law are false and contradicted by official records.

1. **Exhibit 6-B-1** —Plaintiff is a licensed California attorney in good standing with an active law license, authorized to practice law without restriction, and no court or regulatory body has ever found her unfit or engaged in unlawful practice.

**THE STATE BAR OF CALIFORNIA
CERTIFICATE OF STANDING**

ISSUE DATE: 10/19/2025

LICENSEE NAME: Ligia M. Melendez Parmenter

LICENSEE BAR NUMBER: 176196

True and correct copy attached hereto as Exhibit 6-B-1.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

2. **Exhibit 6-B-2** — True and correct screenshot of Plaintiff’s State Bar of California attorney profile showing active licensure and good standing, submitted to authenticate lawful authorization to practice law and rebut Defendant’s false claims.



True and correct copy attached hereto as Exhibit 6-B-2.

3. **Exhibit 6-B-3** — True and correct copies of State Bar of California fee payment records (2018–2025) showing Plaintiff’s timely compliance with licensing requirements, submitted to rebut Defendant’s false claims of unlawful practice.



True and correct copies attached hereto as Exhibit 6-B-3.

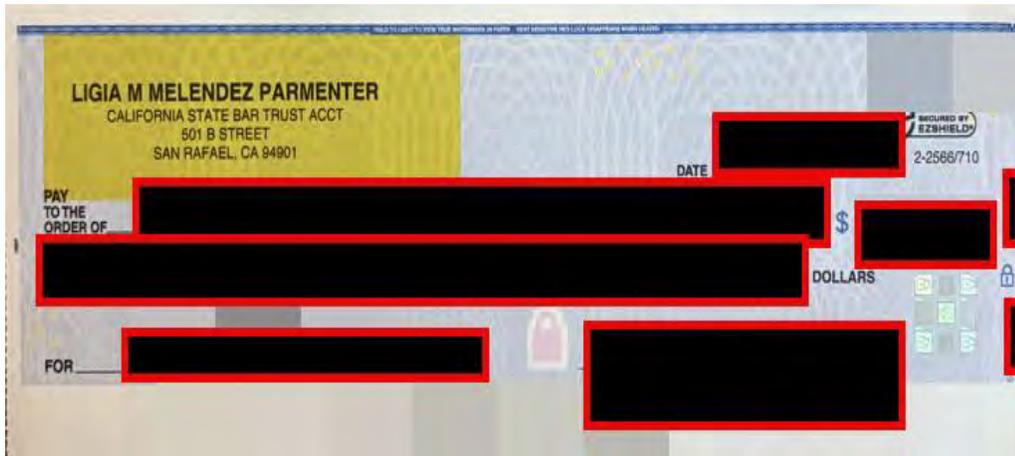
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

4. **Exhibit 6-B-4** — True and correct copy of a redacted Parmenter Law Offices business checking account statement showing Plaintiff’s authorized signatory status and ongoing activity consistent with a bona fide law practice, submitted to rebut Defendant’s false claim of unlawful practice.



True and correct redacted copy attached as **Exhibit 6-B-4**, with limited redactions applied solely to protect against crime and fraud without affecting authenticity or evidentiary relevance.

5. **Exhibit 6-B-5** — True and correct redacted documentation confirming Plaintiff’s compliant State Bar client trust account, submitted to authenticate lawful and ethical administration of client funds.



True and correct redacted copy attached as **Exhibit 6-B-5**, with limited redactions applied solely to protect against crime and fraud without affecting authenticity or evidentiary relevance.

1 C. Plaintiff is mentally competent and stable, with no condition impairing her
2 ability to practice law, and any emotional harm referenced is situational and
3 directly caused by Defendant’s conduct, not any pre-existing condition.

4 **1. Exhibit 6-C-1** — True and correct copy of Plaintiff’s certification
5 confirming first-attempt passage of the California Bar Examination without
6 accommodations, submitted to rebut Defendant’s false implications of
7 mental or cognitive deficiency.

8 **EXHIBIT 6-C-1**
9 **CERTIFICATION OF FIRST-ATTEMPT CALIFORNIA BAR ADMISSION ACHIEVEMENT**
10 **AND PROFESSIONAL ATTORNEY COMPETENCE**

11 True and correct copy attached hereto as Exhibit 6-C-1.

12 **2. Exhibit 6-C-2** — True and correct screenshot of Plaintiff’s State Bar
13 of California attorney profile showing an active, unrestricted license,
14 evidencing no limitations based on mental capacity, fitness, or criminal
15 conduct.

16 **Attorney Profile**
17
18 **Ligia M Melendez Parmenter #176196**
19
20 License Status: **Active** 
21 Address: PARMENTER LAW OFFICES, 501 B St Ste 200, San Rafael, CA 94901-3846
22 Phone: 415-738-7901 | Fax: 415-738-7901
23 Email: Imparmenter@lawpar.com | Website: <http://www.lawpar.com>
24 [More about This Attorney](#) ▼

25 True and correct copy attached hereto as Exhibit 6-C-2.

26 **3. Exhibit 6-C-3** — True and correct copy of Attorney Manuel A.
27 Juarez’s certification, based on over thirty years of first hand personal
28 and professional observation, that Plaintiff is mentally competent,
stable, and fully capable of practicing law.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT 6-C-3
CERTIFICATION OF ATTORNEY MANUEL A. JUAREZ, ESQ.
Personal Knowledge of Plaintiff’s Competence, Stability, and Unrestricted Capacity to Practice Law

True and correct copy attached hereto as Exhibit 6-C-3.

4. Exhibit 6-C-4 — Redacted report of Dr. Jose Pérez, LMFT, providing professional opinion based on clinical evaluation confirming Plaintiff’s mental competence and stability and addressing harassment-related injury.



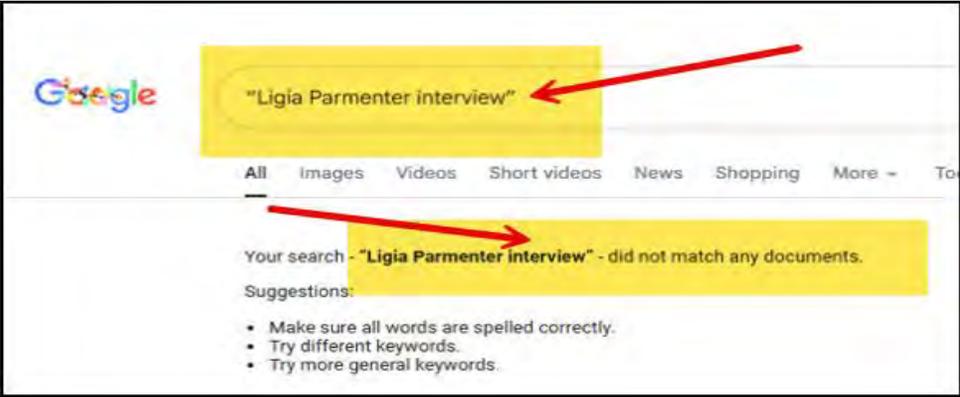
Jose Perez, LMFT (he/him/el)
Licensed Marriage & Family Therapist
License #: LMFT115980

650-429-8076 | joseperez@josepereztherapy.com
josepereztherapy.com | linktr.ee/Josepereztherapy

True and correct copy attached hereto as Exhibit 6-C-4.

VII. SECTION 7 —
Evidence confirming that Plaintiff is a private individual and not a public figure, based on the absence of any celebrity, media, political, or public notoriety, submitted to rebut public-figure treatment and support actual malice.

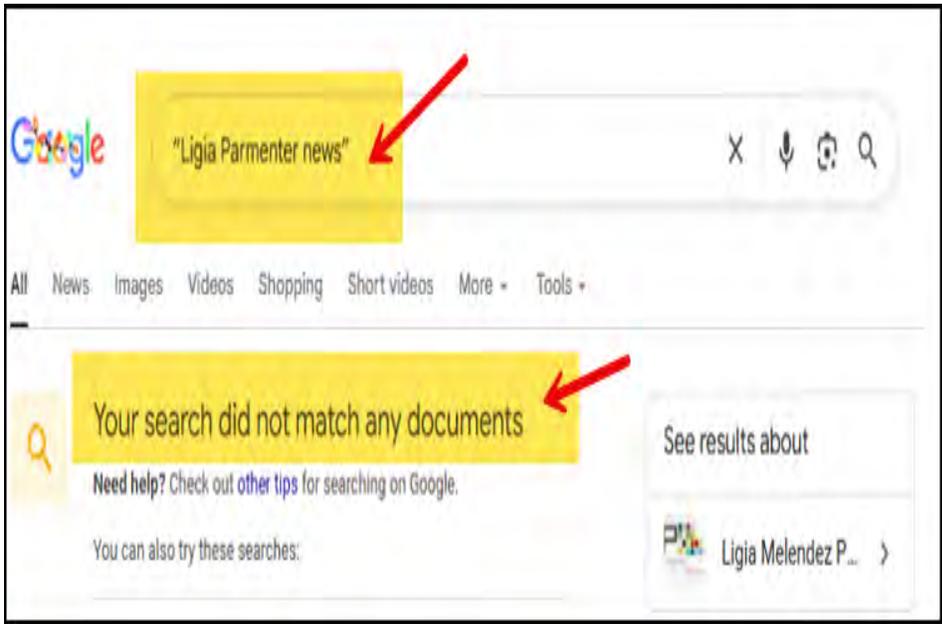
A. Exhibit 7-A — True and correct screenshot of a Google search for “Ligia Parmenter interview” showing zero results, submitted to confirm Plaintiff is not a public figure and has no media or interview presence.



True and correct copy attached hereto as Exhibit 7-A.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

B. Exhibit 7-B — True and correct screenshot of a Google search for “Ligia Parmenter news” showing zero results, submitted to confirm Plaintiff has no press coverage and is not a public figure.



True and correct copy attached hereto as Exhibit 7-B.

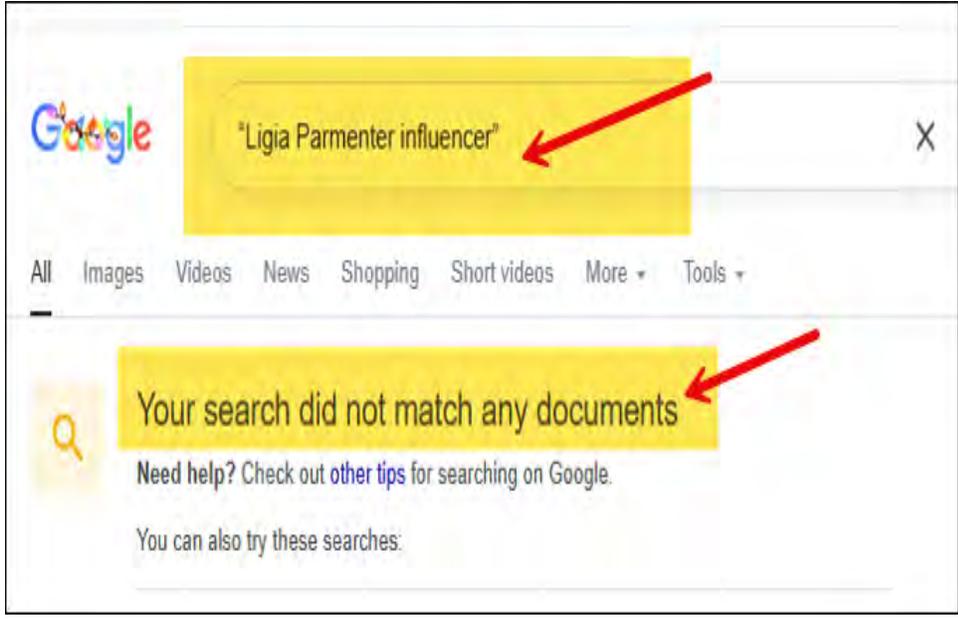
C. Exhibit 7-C — True and correct screenshot of a Google search for “Ligia Parmenter public figure” showing zero results, submitted to confirm Plaintiff is not recognized as a public figure.



True and correct copy attached hereto as Exhibit 7-C.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

D. Exhibit 7-D — True and correct screenshot of a Google search for “Ligia Parmenter influencer” showing zero results, submitted to confirm Plaintiff is not an influencer or public figure.



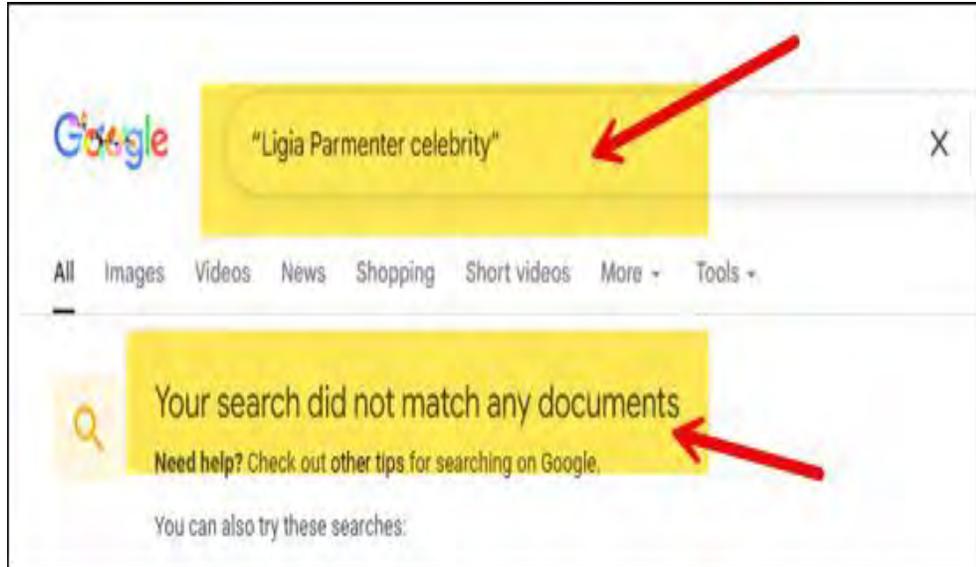
True and correct copy attached hereto as Exhibit 7-D.

E. Exhibit 7-E — True and correct screenshot of a Google search for “Ligia Parmenter politician” showing zero results, submitted to confirm Plaintiff has no political role and is not a public figure.



True and correct copy attached hereto as Exhibit 7-E.

1 F. **Exhibit 7-F** — True and correct screenshot of a Google search for “Ligia
2 Parmenter celebrity” showing zero results, submitted to confirm Plaintiff is not
3 a celebrity or public figure.



13 True and correct copy attached hereto as Exhibit 7-F.

14
15
16
17 **VIII. SECTION 8 — ²**

18 Evidence of economic and non-economic harm caused by Defendant Watters’
19 defamatory publications and threat-driven cyber-harassment, reflecting **preliminary**
20 **estimates only**, with experts to be retained to fully assess damages at trial; all rights
21 are expressly reserved to supplement or augment these figures as additional
22 information becomes available.

23
24
25
26 **A. Exhibit 8-A — Payments Made to Dr. Sid Kalcheim, J.D., M.A.,**
27 **L.M.F.T for Therapy**

28

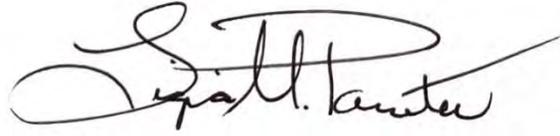
² This section submitted without prejudice, without concession, and without waiver of my right to supplement damages analysis, retain additional expert witnesses including a damages economist, or amend the quantification and methodology asserted herein based on future expert forensic review, economic modeling, or court-authorized evidentiary development.

1 Please also see Declaration of Nicholas Carrol Minimumb \$300,000.00 reputational
2 harm to date.

3
4 Dated this 16th day of January 2026.

Respectfully submitted,

5 **PARMENTER LAW OFFICES**

6
7 

8 By: _____
Ligia Melendez Parmenter
9 Plaintiff

10
11
12 **DECLARATION OF LIGIA M. PARMENTER**

13 I, Ligia Parmenter, declare as follows:

- 14 1. I am an attorney at law duly licensed to practice before this Court and all courts of the State
15 of California. I am the Plaintiff in this action and have personal knowledge of the facts stated in
16 this declaration. If called as a witness, I could and would testify competently thereto.
- 17 2. This declaration is submitted for the purpose of authenticating this Compendium of
18 Evidence (“Compendium”) and all exhibits attached hereto and referenced herein.
- 19 3. Each screenshot, image capture, webpage capture, document image, letter, report,
20 certification, or other digital or documentary exhibit contained in the Compendium was
21 personally accessed, reviewed, and captured by me, or downloaded directly by me from the
22 identified source, and is a true and correct copy of what I obtained from that source. Where a
23 document originated in hard-copy form, I personally scanned the document into electronic
24 format, and the scanned image accurately reflects the original.
- 25 4. In connection with the foregoing, at the time each exhibit was captured, I accessed the
26 content through direct browser navigation to the stated URL or digital source. The exhibits
27 fairly and accurately depict the content as it appeared on the identified date and time.
- 28 5. Pursuant to Evidence Code section 1401, each exhibit, whether a screenshot, image capture,
webpage capture, letter, report, certification, or other documentary or digital material, was
personally accessed, reviewed, and captured by me, or downloaded directly by me from the

1 identified source. As applicable, at the time each exhibit was obtained, I accessed the content by
2 navigating directly to the stated URL or other identified digital source through an internet
3 browser. Each exhibit is a true and correct copy of the source material as it existed on the
4 identified date and time and fairly and accurately depicts what I observed. The exhibits have not
5 been altered, edited, manipulated, or modified in substance.

- 6 6. Any highlighting, appearing on the exhibits were added solely to draw attention to relevant
7 portions of the content and do not alter the underlying material depicted in the screenshot or
8 image.
- 9 7. For each exhibit, I recorded, where applicable: a. the source URL or platform, b. the date and
10 time accessed, c. the method of capture or download, and d. any preservation or archiving steps
11 taken.
- 12 8. Where applicable, each exhibit is followed by an exhibit authentication and source
13 information page identifying the source URL, date and time accessed, method of capture, and
14 any archival or preservation steps taken, which information is incorporated herein by reference.
- 15 9. Where archival or preservation services were used, the archived copies were created
16 contemporaneously or shortly after capture and correspond to the same content depicted in the
17 attached exhibits.
- 18 10. The authentication statements set forth in this declaration apply to each and every exhibit
19 contained in the Compendium, including all numbered exhibits, lettered sub-exhibits, and any
20 grouped or sequential screenshots included therein.
- 21 11. The Compendium was assembled in the ordinary course of preparing this litigation and
22 reflects a systematic, contemporaneous record of the materials depicted.

23 SECTION 1 OF COMPENDIUM

24 Search-Engine Snippet Manipulation, Defamation Per Se, and Continuous Electronic
25 Harassment by Defendant Watters

- 26 12. Attached as **Exhibit 1-A**, is a true and correct copy of: — Google Search Results (Laptop
27 and iPhone Views) Defamatory snippets authored and indexed by Defendant Watters through
28 domain-controlled webpages. Immediately following the exhibit is an exhibit authentication and
source information page setting forth the source URL, date and time accessed, method of
capture, and preservation or archiving information for that exhibit.

- 1 13. Attached as **Exhibit 1-B**, is a true and correct copy of: — Google Snippet False statements
2 published by Defendant Watters alleging unauthorized law practice. Immediately following the
3 exhibit is an exhibit authentication and source information page setting forth the source URL,
4 date and time accessed, method of capture, and preservation or archiving information for that
5 exhibit.
- 6 14. Attached as **Exhibit 1-C**, is a true and correct copy of: — Google Snippets False statements
7 published by Defendant Watters attacking mental stability and intellectual capacity.
8 Immediately following the exhibit is an exhibit authentication and source information page
9 setting forth the source URL, date and time accessed, method of capture, and preservation or
10 archiving information for that exhibit.
- 11 15. Attached as **Exhibit 1-D**, is a true and correct copy of: — Google Results Top-four search-
12 position seizure reflecting snippet dominance engineered by Defendant Watters. Immediately
13 following the exhibit is an exhibit authentication and source information page setting forth the
14 source URL, date and time accessed, method of capture, and preservation or archiving
15 information for that exhibit.
- 16 16. Attached as **Exhibit 1-E**, is a true and correct copy of: — Bing Search Results (Laptop and
17 iPhone Views) RICO criminal accusations published and indexed into result previews by
18 Defendant Watters via forced indexing. Immediately following the exhibit is an exhibit
19 authentication and source information page setting forth the source URL, date and time
20 accessed, method of capture, and preservation or archiving information for that exhibit.
- 21 17. Attached as **Exhibit 1-F**, is a true and correct copy of: — Bing Snippet(s) Authored by
22 Defendant Watters’ law-office CFO/worker, Christina Chung Watters, under the direction of
23 Defendant Watters. Immediately following the exhibit is an exhibit authentication and source
24 information page setting forth the source URL, date and time accessed, method of capture, and
25 preservation or archiving information for that exhibit.
- 26 18. Attached as **Exhibit 1-G**, is a true and correct copy of: — Archived Web Capture
27 Defendant Watters’ law-office webpage expressly identifying Christina Chung Watters as Chief
28 Financial Officer of Defendant Watters’ law office. Immediately following the exhibit is an
exhibit authentication and source information page setting forth the source URL, date and time
accessed, method of capture, and preservation or archiving information for that exhibit.

- 1 19. Attached as **Exhibit 1-H**, is a true and correct copy of: — Bing Snippet(s) False statements
2 published by Defendant Watters alleging mental instability and unauthorized law practice.
3 Immediately following the exhibit is an exhibit authentication and source information page
4 setting forth the source URL, date and time accessed, method of capture, and preservation or
5 archiving information for that exhibit.
- 6 20. Attached as **Exhibit 1-I**, is a true and correct copy of: — Bing Snippet(s) Third-party
7 indexing via ChristinaWatters.com, a CFO-operated domain tied to and directed by Defendant
8 Watters. Immediately following the exhibit is an exhibit authentication and source information
9 page setting forth the source URL, date and time accessed, method of capture, and preservation
10 or archiving information for that exhibit.
- 11 21. Attached as **Exhibit 1-J**, is a true and correct copy of: — Bing Evidentiary Chart Six-result
12 uninterrupted snippet saturation reflecting 24/7 deployment by Defendant Watters.
13 Immediately following the exhibit is an exhibit authentication and source information page
14 setting forth the source URL, date and time accessed, method of capture, and preservation or
15 archiving information for that exhibit.
- 16 22. Attached as **Exhibit 1-K**, is a true and correct copy of: — Yahoo Search Results (Laptop
17 and iPhone Views) Defamatory snippets authored and indexed by Defendant Watters through
18 domain control. Immediately following the exhibit is an exhibit authentication and source
19 information page setting forth the source URL, date and time accessed, method of capture, and
20 preservation or archiving information for that exhibit.
- 21 23. Attached as **Exhibit 1-L**, is a true and correct copy of: — DuckDuckGo Results RICO
22 criminal accusations authored and search-indexed into result previews by Defendant Watters.
23 Immediately following the exhibit is an exhibit authentication and source information page
24 setting forth the source URL, date and time accessed, method of capture, and preservation or
25 archiving information for that exhibit.
- 26 24. Attached as **Exhibit 1-M**, is a true and correct copy of: — DuckDuckGo Snippet(s) False
27 statements published by Defendant Watters attacking mental stability and intellectual capacity.
28 Immediately following the exhibit is an exhibit authentication and source information page
setting forth the source URL, date and time accessed, method of capture, and preservation or
archiving information for that exhibit.

- 1 25. Attached as **Exhibit 1-N**, is a true and correct copy of: — AI Search Result (ChatGPT) “Red
2 Flags” snippet result preview engineered and indexed by Defendant Watters. Immediately
3 following the exhibit is an exhibit authentication and source information page setting forth the
4 source URL, date and time accessed, method of capture, and preservation or archiving
5 information for that exhibit.
- 6 26. Attached as **Exhibit 1-O**, is a true and correct copy of: — Favicon Authorship Proof
7 Favicon attribution confirming snippet origin from Defendant Watters’ law-office domain.
8 Immediately following the exhibit is an exhibit authentication and source information page
9 setting forth the source URL, date and time accessed, method of capture, and preservation or
10 archiving information for that exhibit.
- 11 27. Attached as **Exhibit 1-P**, is a true and correct copy of: — 7-Day Forensic Timeline Chart
12 Timeline of continuous 24/7 cyber-harassment via search-engine snippets deployed by
13 Defendant Watters.

14 SECTION 2 OF COMPENDIUM

15 Extortionate Threats, Search-Engine Ranking Coercion, and Continuous Electronic Cyber-
16 Harassment by Defendant Watters Targeting Plaintiff “Ligia Parmenter, Esq.”

- 17 28. Attached as **Exhibit 2-A**, is a true and correct copy of: — Extortionate Threat Letter
18 (September 19, 2023) Defendant Watters’ written threat demanding Plaintiff abandon her client
19 or face orchestrated public “shaming” and 24/7 electronic harassment, including a threat to
20 dominate search-engine result previews above Plaintiff’s law-office webpages. Which was sent
21 to me by Watters on September 19, 2023.
- 22 29. Attached as **Exhibit 2-B**, is a true and correct copy of: — “COMING SOON” Website
23 Threat (March 7, 2024) Defendant Watters’ public announcement on his law-office webpage
24 signaling planned escalation of defamatory publications and continued electronic cyber-
25 harassment targeting Plaintiff. Immediately following the exhibit is an exhibit authentication
26 and source information page setting forth the source URL, date and time accessed, method of
27 capture, and preservation or archiving information for that exhibit.
- 28 30. Attached as **Exhibit 2-C**, is a true and correct copy of: — Firearm-Linked Branding
Intimidation Context Defendant Watters’ commercial law-office branding “Polite Gunfighter”
displayed in proximity to intimidation communications, submitted solely to document the
context and basis for Plaintiff’s sustained fear for personal safety. Immediately following the

1 exhibit is an exhibit authentication and source information page setting forth the source URL,
2 date and time accessed, method of capture, and preservation or archiving information for that
3 exhibit.

4 *Submitted solely for authentication and context—to demonstrate Defendant’s*
5 *intentional identification of Plaintiff and the fear induced by his threatened future*
6 *escalation, not as an independent ground for suit.*

- 7 31. Attached as **Exhibit 2-D**, is a true and correct copy of: — Firearm Imagery (December 25,
8 2024) Webpage capture documenting Defendant Watters’ use of military-style assault-rifle
9 imagery, submitted solely to document escalating intimidation and the origin of Plaintiff’s
10 sustained fear for safety. Immediately following the exhibit is an exhibit authentication and
11 source information page setting forth the source URL, date and time accessed, method of
12 capture, and preservation or archiving information for that exhibit.

13 *Submitted solely for authentication and context—to demonstrate Defendant’s*
14 *intentional identification of Plaintiff and the fear induced by his threatened future*
15 *escalation, not as an independent ground for suit.*

- 16 32. Attached as **Exhibit 2-E**, is a true and correct copy of: — Unauthorized FBI Seal Usage
17 Screenshot capture documenting Defendant Watters’ unauthorized display of a Federal Bureau
18 of Investigation (FBI) seal on his law-office webpage, implying federal affiliation and
19 intensifying intimidation toward Plaintiff. Immediately following the exhibit is an exhibit
20 authentication and source information page setting forth the source URL, date and time
21 accessed, method of capture, and preservation or archiving information for that exhibit.

22 *Submitted solely for authentication and context—to demonstrate Defendant’s intentional*
23 *identification of Plaintiff and the fear induced by his threatened future escalation, not as an*
24 *independent ground for suit.*

- 25 33. Attached as **Exhibit 2-F**, is a true and correct copy of: — Simulated “FBI Special Agent
26 Clearance Unit” Badge Statement Defendant Watters’ badge-style publication mimicking
27 federal investigative authority, displayed alongside his self-promotion as a “private investigator
28 for hire,” despite lacking California private-investigator licensure or certification.

Submitted solely for authentication and context—to demonstrate Defendant’s intentional
identification of Plaintiff and the fear induced by his threatened future escalation, not as an
independent ground for suit. Immediately following the exhibit is an exhibit authentication and

1 source information page setting forth the source URL, date and time accessed, method of
2 capture, and preservation or archiving information for that exhibit.

3 34. Attached as **Exhibit 2-G**, is a true and correct copy of: — Google Snippet Advertising
4 Investigative Services (Unlicensed PI Representation) Search-indexed result preview wherein
5 Defendant Watters advertises “private investigations” and portrays investigative capability on
6 par with licensed private investigators, despite having no California PI license. Immediately
7 following the exhibit is an exhibit authentication and source information page setting forth the
8 source URL, date and time accessed, method of capture, and preservation or archiving
9 information for that exhibit.

10 35. Attached as **Exhibit 2-H**, is a true and correct copy of: — “Cyber Investigator
11 Specialization” and False PI Credentials Webpage Defendant Watters’ law-office
12 “Investigations” webpage wherein he advertises himself as an “investigator specializing in
13 cyber investigations,” holds himself out as a private investigator, and implies affiliation with
14 federal law-enforcement authority, despite lacking California PI licensure under BSIS.
15 Immediately following the exhibit is an exhibit authentication and source information page
16 setting forth the source URL, date and time accessed, method of capture, and preservation or
17 archiving information for that exhibit.

18 36. Attached as **Exhibit 2-I**, is a true and correct copy of: — Defendant Watters’ Public “Hall
19 of Shame” Threat Statement Defendant Watters’ own declaration describing his “Hall of
20 Shame” as a ranked *retribution mechanism* in the court of public *opinion*, acknowledging a
21 blurred “thin red line between the brave and the crazy...lol,” reflecting retaliatory intent and
22 prioritization of targets. Immediately following the exhibit is an exhibit authentication and
23 source information page setting forth the source URL, date and time accessed, method of
24 capture, and preservation or archiving information for that exhibit.

25 SECTION 3 OF COMPENDIUM

26 ADA Protected - Disability-Perception Targeting, Search-Engine Coercion, and Continuous
27 Electronic Cyber-Harassment by Defendant Watters Against Plaintiff Ligia Parmenter, Esq.

28 37. Attached as **Exhibit 3-A**, is a true and correct copy of: — Disability-Targeted Psychiatric
Intimidation Defamatory and threatening communications authored by Defendant Watters
weaponizing psychiatric labeling (“mental illness,” “Cluster B personality disorders”), and

1 directing victims to “DSM-5 for guidance,” targeting lawyers he perceives as mentally
2 impaired. See also extortion threat letter dated September 19, 2023 (Exhibit 2-A).

3 *Submitted solely for authentication and context—to demonstrate Defendant’s intentional*
4 *identification of Plaintiff and the fear induced by his threatened future escalation, not as an*
5 *independent ground for suit.* Immediately following the exhibit is an exhibit authentication and
6 source information page setting forth the source URL, date and time accessed, method of
capture, and preservation or archiving information for that exhibit.

7 38. Attached as **Exhibit 3-B**, is a true and correct copy of: — ADA Accommodation and
8 Resulting Psychiatric Injury Documentation establishing Plaintiff’s Superior Court of San
9 Mateo - court-granted ADA accommodation issued by the Superior Court of San Mateo as a
10 direct result of Defendant Watters’ sustained cyber-harassment, defamatory online
11 publications, and intentional infliction of emotional distress.

12 39. Attached as **Exhibit 3-C**, is a true and correct copy of: — Retaliatory Post-Accommodation
13 Threat (November 17, 2025) Threat communication authored by Defendant Watters warning of
14 further defamatory publication escalation, doxing, and continued 24/7 electronic cyber-
15 harassment, issued immediately following the court’s grant of Plaintiff’s ADA accommodation.
16 Immediately following the exhibit is an exhibit authentication and source information page
17 setting forth the source URL, date and time accessed, method of capture, and preservation or
18 archiving information for that exhibit.

19 *Submitted solely for authentication and context—to demonstrate Defendant’s intentional*
20 *identification of Plaintiff and the fear induced by his threatened future escalation, not as an*
21 *independent ground for suit.*

22 40. Attached as **Exhibit 3-D**, is a true and correct copy of: — False statements by Defendant
23 Andrew Watters alleging a “Mexico RICO timeshare scam,” offered to demonstrate racially
24 targeted defamatory conduct directed at Plaintiff as a Latina attorney. Immediately following
25 the exhibit is an exhibit authentication and source information page setting forth the source
26 URL, date and time accessed, method of capture, and preservation or archiving information for
27 that exhibit.

28 //

//

//

SECTION 4 OF COMPENDIUM

Search-Indexed Defamation Per Se, Authority Simulation, and 24/7 Electronic Cyber-Harassment Manufactured and Published by Defendant Watters Targeting Plaintiff “Ligia Parmenter, Esq.”

- 1
2
3
4 41. Attached as **Exhibit 4-A**, is a true and correct copy of: — Hall of Shame Headline
5 Publication and Public Targeting True and correct screenshot capture of Defendant Watters’
6 commercial law-office website displaying Plaintiff’s name “LIGIA PARMENTER, ESQ.” in
7 massive bold headline format, engineered for global search-engine indexing, public targeting,
8 and intimidation. Immediately following the exhibit is an exhibit authentication and source
9 information page setting forth the source URL, date and time accessed, method of capture, and
10 preservation or archiving information for that exhibit.
- 11 42. Attached as **Exhibit 4-B**, is a true and correct copy of: — False “Hall of Justice & Records”
12 Authority Emblem Misrepresentation True and correct screenshot capture of Defendant
13 Watters’ law-office webpage displaying a simulated “*Hall of Justice & Records*” emblem
14 positioned adjacent to defamatory statements about Plaintiff, implying fabricated judicial
15 validation and institutional authority. Immediately following the exhibit is an exhibit
16 authentication and source information page setting forth the source URL, date and time
17 accessed, method of capture, and preservation or archiving information for that exhibit.
- 18 43. Attached as **Exhibit 4-C**, is a true and correct copy of: — Defamatory Per Se Statement #1
19 (Mexico RICO / Timeshare Scam / Unlawful Law Practice) True and correct screenshot capture
20 of Defendant Watters’ publication asserting that Plaintiff is *a RICO racketeer in Mexico,*
21 *involved in a timeshare scam, and unlawfully practicing law,* deployed to dominate search-
22 engine result previews on a 24/7 basis. Immediately following the exhibit is an exhibit
23 authentication and source information page setting forth the source URL, date and time
24 accessed, method of capture, and preservation or archiving information for that exhibit.
- 25 44. Attached as **Exhibit 4-D**, is a true and correct copy of: — Defamatory Per Se Statement #2
26 (“Should Not Be Practicing Law” / Unlawful Practice Accusation) True and correct screenshot
27 capture of Defendant Watters’ publication asserting that Plaintiff “*should not be practicing*
28 *law,*” and *misrepresenting to the public that she engages in the unlawful practice of law,*
reinforced through search-index propagation. Immediately following the exhibit is an exhibit
authentication and source information page setting forth the source URL, date and time
accessed, method of capture, and preservation or archiving information for that exhibit.

- 1 45. Attached as **Exhibit 4-E**, is a true and correct copy of: — Defamatory Per Se Statement #3
2 (Mental Deficiency / Mental Instability Accusation) True and correct screenshot capture of
3 Defendant Watters’ publication describing Plaintiff as an attorney who is *mentally deficient and*
4 *mentally unstable*, including underline formatting that was present in the original publication
5 and used by Defendant to ensure authoritative visual impact. Immediately following the exhibit
6 is an exhibit authentication and source information page setting forth the source URL, date and
7 time accessed, method of capture, and preservation or archiving information for that exhibit.
- 8 46. Attached as **Exhibit 4-E-1**, is a true and correct copy of: — Doxing, Underlining, and Live-
9 Hyperlink Identification of Plaintiff True and correct screenshot capture evidencing that
10 Defendant Watters underlined *defamatory text in the original webpage and embedded a live*
11 *hyperlink directing to Plaintiff’s law-office webpage displaying her photograph*, ensuring the
12 public understood that Defendant’s defamatory statements were expressly about Plaintiff
13 herself, and not generalized commentary. Immediately following the exhibit is an exhibit
14 authentication and source information page setting forth the source URL, date and time
15 accessed, method of capture, and preservation or archiving information for that exhibit.
- 16 47. Attached as **Exhibit 4-F**, is a true and correct copy of: — Defamatory Per Se Statement #4
17 (Mental Deficiency / Mental Instability / Unlawful Practice Restated) True and correct
18 screenshot capture of Defendant Watters’ publication reiterating false claims that Plaintiff is a
19 *mentally deficient, mentally unstable lawyer engaged in unlawful law practice*, deployed for
20 continuous search-engine visibility. Immediately following the exhibit is an exhibit
21 authentication and source information page setting forth the source URL, date and time
22 accessed, method of capture, and preservation or archiving information for that exhibit.
- 23 48. Attached as **Exhibit 4-G**, is a true and correct copy of: — Secondary Domain Defamatory
24 Harassment (“JD Underground” / Spanish-Advocacy Profiling) True and correct screenshot
25 capture from Defendant Watters’ secondary attorney-focused publication platform wherein
26 Defendant publicly attacks Plaintiff as a “*nut case attorney*” in combination with defamatory
27 assertions tied to her Spanish-language advocacy, reinforcing the harassment and reputational
28 intimidation campaign. Immediately following the exhibit is an exhibit authentication and
source information page setting forth the source URL, date and time accessed, method of
capture, and preservation or archiving information for that exhibit.

SECTION 5 OF COMPENDIUM

Defendant Watters’ Commercial Law-Firm Domain and Defamatory Marketing Infrastructure (AndrewWatters (dot) com as Attorney Advertising; “Hall of Shame” as Cornerstone Marketing Feature; Not Personal Webpages)

- 1
2
3
4 49. Attached as **Exhibit 5-A**, is a true and correct copy of: — Operational Control and
5 Publication Infrastructure (Law-Office “Command Center”) Photograph and archived webpage
6 capture depicting Defendant Watters operating a multi-monitor workstation and server
7 infrastructure from his law office while working on www.andrewwatters.com, offered to
8 demonstrate Defendant’s direct operational control over the commercial law-firm domain and
9 the publication systems used to create and disseminate the harassing/defamatory content
10 alleged. Immediately following the exhibit is an exhibit authentication and source information
11 page setting forth the source URL, date and time accessed, method of capture, and preservation
12 or archiving information for that exhibit.
- 13 50. Attached as **Exhibit 5-B**, is a true and correct copy of: — Google Search Snippet for
14 “Andrew Watters Attorney” Showing “Hall of Shame” as Cornerstone Result
15 Search-engine result demonstrating that when the public searches “Andrew Watters attorney,”
16 the top result/snippet is drawn from Defendant’s *Hall of Shame* content on
17 www.andrewwatters.com/hall-of-shame/, evidencing its role as the dominant, signature feature
18 of Defendant’s attorney-marketing presence. Immediately following the exhibit is an exhibit
19 authentication and source information page setting forth the source URL, date and time
20 accessed, method of capture, and preservation or archiving information for that exhibit.
- 21 51. Attached as **Exhibit 5-C**, is a true and correct copy of: — Bing Search Result for “Andrew
22 Watters Attorney” Showing “Hall of Shame” as Cornerstone Result
23 Bing search-engine result and snippet reflecting Defendant’s *Hall of Shame* as the primary
24 branded content surfaced for his attorney advertising presence on www.andrewwatters.com.
25 Immediately following the exhibit is an exhibit authentication and source information page
26 setting forth the source URL, date and time accessed, method of capture, and preservation or
27 archiving information for that exhibit.
- 28 52. Attached as **Exhibit 5-D**, is a true and correct copy of: — Yahoo Search Result for “Andrew
Watters Attorney” Showing “Hall of Shame” as Cornerstone Result Yahoo search-engine result
and snippet demonstrating the prominence of Defendant’s *Hall of Shame* within the public-
facing search presentation of his law-firm domain. Immediately following the exhibit is an

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

exhibit authentication and source information page setting forth the source URL, date and time accessed, method of capture, and preservation or archiving information for that exhibit.

53. Attached as **Exhibit 5-E**, is a true and correct copy of: — DuckDuckGo Search Result for “Andrew Watters Attorney” Showing “Hall of Shame” as Cornerstone Result DuckDuckGo result evidencing that Defendant’s *Hall of Shame* content is the leading or defining search-presented feature of his attorney marketing domain, supporting that the site functions commercially and not as personal commentary. Immediately following the exhibit is an exhibit authentication and source information page setting forth the source URL, date and time accessed, method of capture, and preservation or archiving information for that exhibit.

54. Attached as **Exhibit 5-F**, is a true and correct copy of: — Commercial Law-Firm Webpage Attorney Advertising Identification (Professional Headshot and Biography) Screenshot capture from Defendant’s law-office website reflecting attorney advertising: professional headshot, self-identification as a California attorney, legal credentials, claimed experience, and promotion of “legal services,” confirming the commercial marketing purpose of www.andrewwatters.com. Immediately following the exhibit is an exhibit authentication and source information page setting forth the source URL, date and time accessed, method of capture, and preservation or archiving information for that exhibit.

55. Attached as **Exhibit 5-G**, is a true and correct copy of: — Archived Commercial Law-Firm Domain Record (AndrewWatters.com) Archived capture of Defendant’s branded law-firm domain showing navigation, attorney biography, and legal services presentation consistent with commercial attorney advertising—confirming the domain is a law-office business site, not a personal blog or private forum. Immediately following the exhibit is an exhibit authentication and source information page setting forth the source URL, date and time accessed, method of capture, and preservation or archiving information for that exhibit.

56. Attached as **Exhibit 5-H**, is a true and correct copy of: — Website Identification of Defendant’s Law Practice and Practice Areas Screenshot capture identifying Defendant’s law practice and practice areas (e.g., “general civil litigation,” “complex family law”) on www.andrewwatters.com, demonstrating the domain’s commercial attorney-services marketing purpose rather than personal speech. Immediately following the exhibit is an exhibit authentication and source information page setting forth the source URL, date and time accessed, method of capture, and preservation or archiving information for that exhibit.

1 57. Attached as **Exhibit 5-I**, is a true and correct copy of: — State Bar of California Record
2 Identifying AndrewWatters.com as Defendant’s Law-Office Website State Bar record
3 identifying www.AndrewWatters.com as Defendant’s law office website, confirming public
4 professional recognition of the domain as a law-firm commercial site. Immediately following
5 the exhibit is an exhibit authentication and source information page setting forth the source
6 URL, date and time accessed, method of capture, and preservation or archiving information for
7 that exhibit.

8 58. Attached as **Exhibit 5-J**, is a true and correct copy of: — San Mateo County Bar Association
9 Forced Resignation Letter (March 14, 2025) Tied to “Hall of Shame” **Publications** San Mateo
10 County Bar Association forced resignation letter requiring Defendant Watters to resign his
11 “I.P./Technology Chair” role due to his publication of **Hall of Shame** content on
12 www.andrewwatters.com/hall-of-shame/. Offered to demonstrate that Defendant’s Hall of
13 Shame conduct was treated as *lawyer/professional conduct associated with his law-firm*
14 *domain*, not personal hobby speech, and that the Hall of Shame functions as commercial
15 attorney branding/public professional representation. Immediately following the exhibit is an
16 exhibit authentication and source information page setting forth the source URL, date and time
17 accessed, method of capture, and preservation or archiving information for that exhibit.

18 SECTION 6 OF COMPENDIUM

19 Defendant Watters’ Knowing, Intentional, and Commercially Deployed False Defamatory
20 Statements Targeting Plaintiff (False Accusations of Mexican RICO Racketeering, Timeshare
21 Scammer Criminality, Unlawful Law Practice, and Mental Deficiency; Demonstrating Falsity,
22 Malice, and Resulting Harm)

23 A. Evidence Rebutting Defendant Watters’ False Statements of Mexican RICO Racketeering
24 and Timeshare-Scam Criminality

25 59. Attached as **Exhibit 6-A-1**, is a true and correct copy of: — Federal Bureau of Investigation
26 Clearance Letter (Legal Name: Ligia Maria Melendez)

27 60. Attached as **Exhibit 6-A-2**, — Plaintiff’s Valid U.S. Passport and Lawful Entry/Exit Travel
28 Record (Legal Name: Ligia Maria Melendez)

61. **Exhibit 6-A-3**, is a true and correct copy of: — Public Federal Criminal Case Name Check
(Zero Result) — “Ligia Maria Melendez”

- 1 62. Attached as **Exhibit 6-A-4**, — Public Federal Criminal Case Name Check (Zero Result) —
2 “Ligia Parmenter”
- 3 **B. Evidence Rebutting Defendant Watters’ Knowingly False Statements Implying Plaintiff’s**
4 **Unlawful or Unauthorized Practice of Law in California**
- 5 63. Attached as **Exhibit 6-B-1**, is a true and correct copy of: — State Bar of California
6 Licensure and Certificate of Good Standing (30-Year Unrestricted Practice Record)
- 7 64. Attached as **Exhibit 6-B-2**, is a true and correct copy of: — State Bar of California Attorney
8 Profile (Active, Unrestricted License — 24/7 Public Attorney-Advertising Registry)
- 9 65. Attached as **Exhibit 6-B-3**, — State Bar of California Attorney Fee Payment Records
10 (2018–2025)
- 11 66. Attached as **Exhibit 6-B-4**, is a true and correct copy of: — Parmenter Law Offices Business
12 Checking Account Statement (Redacted solely for protection against crime, fraud, and financial
13 misuse; authenticity preserved)
- 14 67. Attached as **Exhibit 6-B-5**, is a true and correct copy of: — State Bar Client Trust Account
15 Compliance Record (Redacted solely for protection against crime, fraud, and financial misuse;
16 authenticity preserved)
- 17 **C. Evidence Rebutting Defendant Watters’ False Statements Implying Plaintiff is Mentally**
18 **Deficient, Mentally Unstable, or Mentally Incapacitated**
- 19 68. Attached as **Exhibit 6-C-1**, is a true and correct copy of: — Certification of First-Attempt
20 California Bar Admission and Attorney Practice Capacity (No Cognitive Accommodation
21 Required)
- 22 69. Attached as **Exhibit 6-C-2**, is a true and correct copy of: — State Bar of California Attorney
23 Profile (Active, Unrestricted License; No Restrictive Notation for Mental Capacity or
24 Professional Fitness Ever Issued)
- 25 70. Attached as **Exhibit 6-C-3**, is a true and correct copy of: — Declaration and Certification of
26 Attorney Manuel A. Juarez, Esq. (30+ Years Co-Counsel Collaboration; Personal-Knowledge
27 Attestation of Plaintiff’s Full Mental Competence and Stability)
- 28 71. **Exhibit 6-C-4**, is a true and correct copy of: — Expert Clinical Evaluation and Licensed
Therapist Report of Dr. Jose Pérez, LMFT (Redacted solely for protection against crime and
misuse; confirms full mental competence, stability, and no pre-existing mental or cognitive
deficiency)

SECTION 7 OF COMPENDIUM

Evidence Confirming Plaintiff Ligia Parmenter, Esq. Is Not a Public Figure of Any Kind Under California Law (Zero Results on Public-Figure Associated Google Search Queries)

- 1
2
3 72. Attached as **Exhibit 7-A**, is a true and correct copy of: — Google Search for “Ligia
4 Parmenter interview” (Zero Results) True and correct screenshot capture of a public Google
5 search for “Ligia Parmenter interview,” offered to affirmatively authenticate that Plaintiff has
6 never appeared in interviews, press media, broadcasts, or voluntary public forums that could
7 confer public-figure status. True and correct copy attached hereto as Exhibit 7-A. Immediately
8 following the exhibit is an exhibit authentication and source information page setting forth the
9 source URL, date and time accessed, method of capture, and preservation or archiving
10 information for that exhibit.
- 11 73. Attached as **Exhibit 7-B**, is a true and correct copy of: — Google Search for “Ligia
12 Parmenter news” (Zero Results) True and correct screenshot capture of a public Google search
13 for “Ligia Parmenter news,” offered to affirmatively authenticate that Plaintiff has never been
14 the subject of press coverage, media notoriety, or public news reporting that could confer
15 public-figure classification. True and correct copy attached hereto as Exhibit 7-B. Immediately
16 following the exhibit is an exhibit authentication and source information page setting forth the
17 source URL, date and time accessed, method of capture, and preservation or archiving
18 information for that exhibit.
- 19 74. Attached as **Exhibit 7-C**, is a true and correct copy of: — Google Search for “Ligia
20 Parmenter public figure” (Zero Results) True and correct screenshot capture of a public Google
21 search for “Ligia Parmenter public figure,” returning no indexed results identifying or
22 classifying Plaintiff as a public figure, offered to affirmatively rebut any inference that Plaintiff
23 has achieved public-figure status in any jurisdiction. True and correct copy attached hereto as
24 Exhibit 7-C. Immediately following the exhibit is an exhibit authentication and source
25 information page setting forth the source URL, date and time accessed, method of capture, and
26 preservation or archiving information for that exhibit.
- 27 75. Attached as **Exhibit 7-D**, is a true and correct copy of: — Google Search for “Ligia
28 Parmenter influencer” (Zero Results) True and correct screenshot capture of a public Google
search for “Ligia Parmenter influencer,” offered to affirmatively authenticate that Plaintiff has
never cultivated or been recognized as a social-media influencer, commercial promoter, or

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

digital public personality exercising audience persuasion or public influence. True and correct copy attached hereto as Exhibit 7-D. Immediately following the exhibit is an exhibit authentication and source information page setting forth the source URL, date and time accessed, method of capture, and preservation or archiving information for that exhibit.

76. Attached as **Exhibit 7-E**, is a true and correct copy of: — Google Search for “Ligia Parmenter politician” (Zero Results) True and correct screenshot capture of a public Google search for “Ligia Parmenter politician,” offered to affirmatively authenticate that Plaintiff has never held, campaigned for, or been publicly identified as serving in any elected position, public office, political role, or political public-figure identity in any jurisdiction. True and correct copy attached hereto as Exhibit 7-E. Immediately following the exhibit is an exhibit authentication and source information page setting forth the source URL, date and time accessed, method of capture, and preservation or archiving information for that exhibit.

77. Attached as **Exhibit 7-F**, is a true and correct copy of: — Google Search for “Ligia Parmenter celebrity” (Zero Results) True and correct screenshot capture of a public Google search for “Ligia Parmenter celebrity,” offered to affirmatively authenticate that Plaintiff has never achieved, solicited, cultivated, or been publicly recognized as holding celebrity status, media fame, entertainment persona, or pervasive public notoriety of any kind in any jurisdiction. True and correct copy attached hereto as Exhibit 7-F.

SECTION 8 OF COMPENDIUM

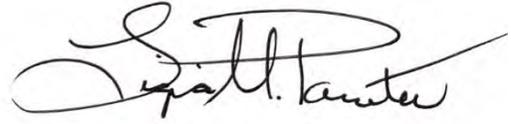
Evidence Of Provable Damages and Resulting Harm Caused Solely By Defendant Watters’ Defamatory and Cyber-Harassing Publications

78. Attached as **Exhibit 8-A**, is a true and correct copy of: — Zelle Payment Record Captures for Therapeutic Care Rendered by Licensed Therapist, Dr. Sid Kalcheim True and correct screenshot captures of Plaintiff’s Zelle payment history and corresponding banking transaction records reflecting disbursements paid for licensed therapeutic treatment rendered by Dr. Sid Kalcheim, incurred exclusively to treat situational severe emotional distress, panic attacks, acute psychological injury, and episodes of debilitating fear directly caused solely by Defendant Watters’ defamatory publications and escalating cyber-harassment threats. These payment records are offered to substantiate compensable out-of-pocket mitigation costs, authenticate causation, and confirm that the treatment and associated damages arise from Defendant’s conduct alone. True and correct copy attached hereto as Exhibit 8-A

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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

Dated this 16th day of January 2026



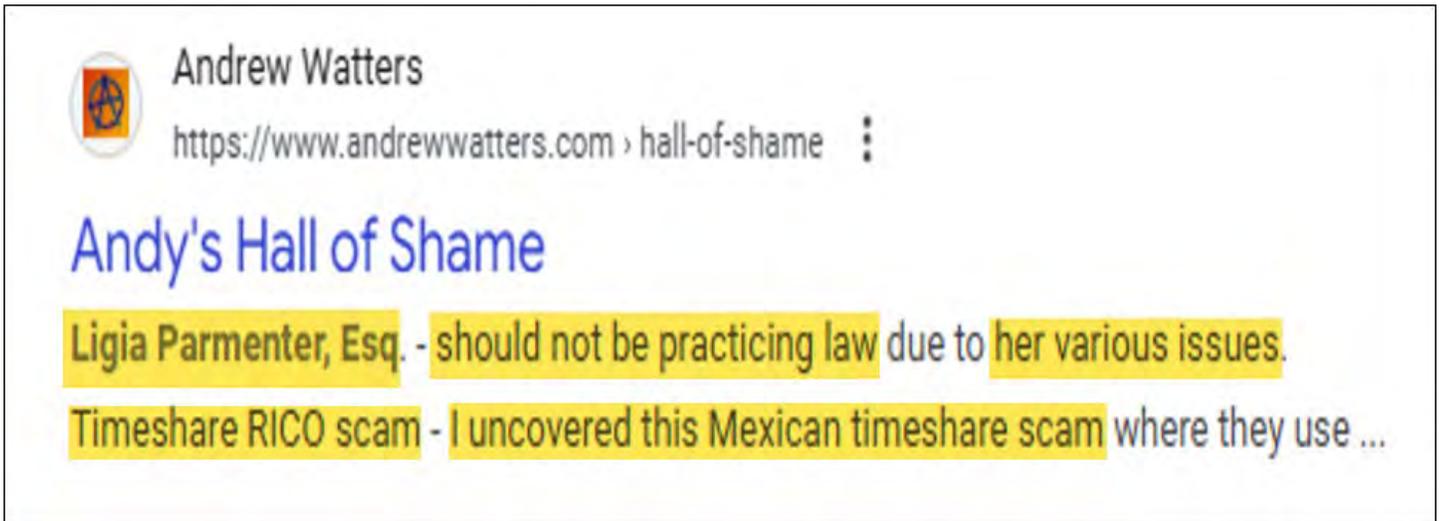
L.M. Parmenter
Attorney at Law

EXHIBIT 1-A

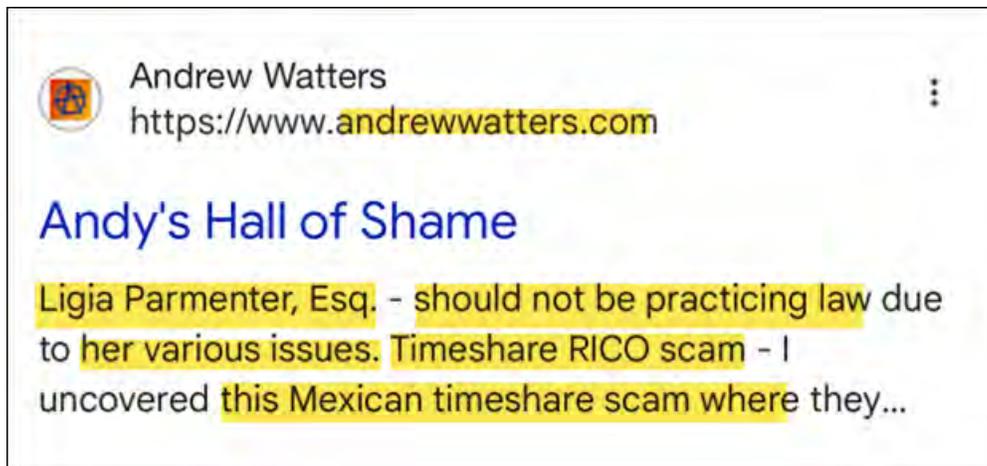
EXHIBIT 1-A

Google search result snippets manufactured by Watters falsely accusing Plaintiff of RICO (Racketeer Influenced and Corrupt Organizations Act) criminality and unlawful practice of law.

(Laptop View of Google Search)



(iPhone Mobile View of Google Search)



* Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.

Description:	Google search result snippets manufactured by Watters falsely accusing Plaintiff of RICO (Racketeer Influenced and Corrupt Organizations Act) criminality and unlawful practice of law.
Source / URL:	"LIGIA PARMENTER, ESQ" - Google Search - please see below
Captured by:	Captured using Snagit (TechSmith) — Software v2024.1.2. by Ligia M. Parmenter; iPhone Screenshot captured on Apple iPhone device by Ligia M. Parmenter, using the native iOS screenshot function (hardware button capture).
Date Captured:	November 29, 2025 at 12:13 p.m. PST
True and Correct Copy:	Yes — authenticated in declaration.

"LIGIA PARMENTER, ESQ" - Google Search

https://www.google.com/search?q=%22LIGIA+PARMENTER%2C+ESQ%22&oq=%22ligia+&gs_lcrp=EgRlZGdlKgYIAhBFGDsyCQgAEEUYOxj5BzIGCAEQRRg5MgYIAhBFGDsyBwgDEAAYgAQyBwgEEAAYgAQyBwgFEAAYgAQyBggGEEUYPDIGCAcQRRg8MgYICBBFGDzSAQg2NDQwajBqNKgCALACAQ&sourceid=chrome&ie=UTF-8

****NOTICE:** Search-engine snippet URLs (Google, Bing, Yahoo, DuckDuckGo, etc.) are dynamically generated, non-static links that frequently change based on indexing, algorithm updates, geolocation, personalization, and search-engine rotation. If copied and pasted at a later time, these URLs will likely not open the same content or may fail to open at all. Accordingly, reliance should be made on the authenticated screenshot exhibits included herein as the accurate representation of the content as it appeared on the date and time of capture.

** Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

EXHIBIT 1-B

EXHIBIT I-B

Google search result Snippets manufactured by Watters falsely asserting that Plaintiff is unlawfully practicing law due to “various issues.”



** Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

Description:	Google search result Snippets manufactured by Watters falsely asserting that Plaintiff is unlawfully practicing law due to “various issues.”
Source / URL:	"LIGIA PARMENTER, ESQ" - Google Search - please see below
Captured by:	Captured using Snagit (TechSmith) — Software v2024.1.2. by Ligia M. Parmenter
Date Captured:	December 13, 2025 at 12:35 p.m. PST
True and Correct Copy:	Yes — authenticated in declaration.

https://www.google.com/search?q=%22andrew+watters%22+Ligia&oq=%22andrew+watters%22+Ligia&gs_lcrp=EgRIZGdlKgYIABBFgDkyBggAEEUYOTIHCAEQABjvBTIKCAIQABiABBiiBDIKCAMQABiABBiiBDIKCAQQABiABBiiBNIBCTEyMzAwajBqNKgCALACAQ&sourceid=chrome&ie=UTF-8

****NOTICE:** Search-engine snippet URLs (Google, Bing, Yahoo, DuckDuckGo, etc.) are dynamically generated, non-static links that frequently change based on indexing, algorithm updates, geolocation, personalization, and search-engine rotation. If copied and pasted at a later time, these URLs will likely not open the same content or may fail to open at all. Accordingly, reliance should be made on the authenticated screenshot exhibits included herein as the accurate representation of the content as it appeared on the date and time of capture.

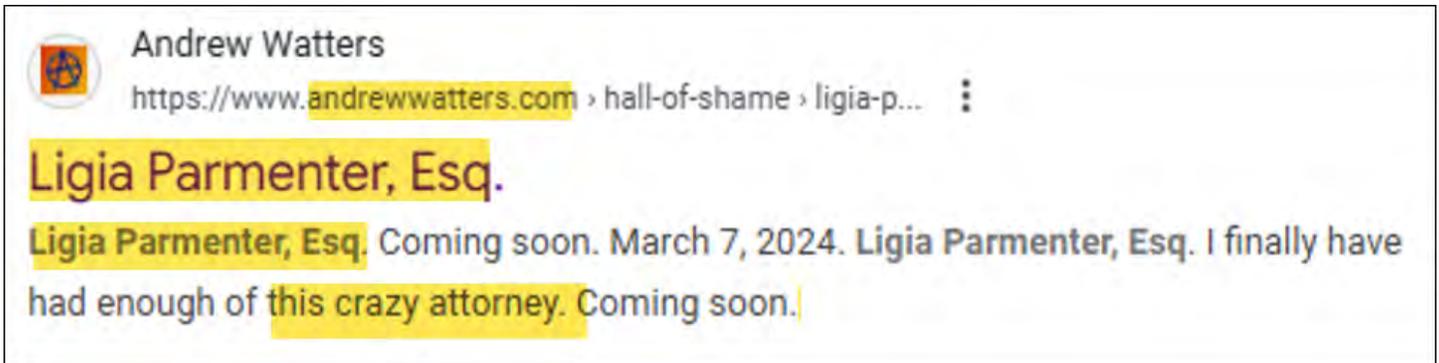
** Highlighting (if any) added for the Court’s convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

EXHIBIT 1-C

EXHIBIT 1-C

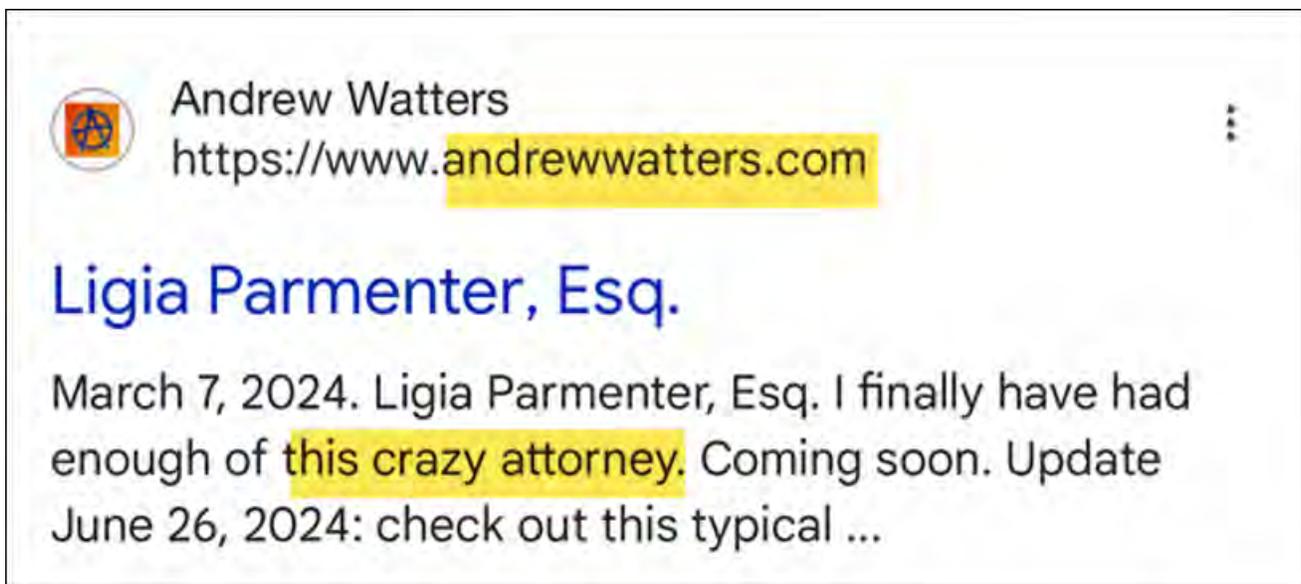
Google search result Snippets manufactured by Watters falsely claiming that Plaintiff is intellectually deficient and mentally unstable.

(Laptop View of Google Search)



Andrew Watters
<https://www.andrewwatters.com> › hall-of-shame › ligia-p...
Ligia Parmenter, Esq.
Ligia Parmenter, Esq. Coming soon. March 7, 2024. Ligia Parmenter, Esq. I finally have had enough of this crazy attorney. Coming soon.

(iPhone Mobile View of Google Search)



Andrew Watters
<https://www.andrewwatters.com>
Ligia Parmenter, Esq.
March 7, 2024. Ligia Parmenter, Esq. I finally have had enough of this crazy attorney. Coming soon. Update June 26, 2024: check out this typical ...

* Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.

Description:	Google search result Snippets manufactured by Watters falsely claiming that Plaintiff is intellectually deficient and mentally unstable.
Source / URL:	"LIGIA PARMENTER, ESQ" - Google Search - please see below
Captured by:	Captured using Snagit (TechSmith) — Software v2024.1.2. by Ligia M. Parmenter; iPhone Screenshot captured on Apple iPhone device by Ligia M. Parmenter, using the native iOS screenshot function (hardware button capture).
Date Captured:	November 29, 2025 at 12:13 p.m. PST
True and Correct Copy:	Yes — authenticated in declaration.

"LIGIA PARMENTER, ESQ" - Google Search

https://www.google.com/search?q=%22LIGIA+PARMENTER%2C+ESQ%22&oq=%22ligia+&gs_lcrp=EgRI ZGdlKgYIAhBFGDsyCQgAEEUYOxj5BzIGCAEQRRg5MgYIAhBFGDsyBwgDEAAYgAQyBwgEEAAYg AQyBwgFEAAYgAQyBggGEEUYPDIGCAcQRRg8MgYICBBFGDzSAQg2NDQwajBqNKgCALACAQ&sourceid=chrome&ie=UTF-8

****NOTICE:** Search-engine snippet URLs (Google, Bing, Yahoo, DuckDuckGo, etc.) are dynamically generated, non-static links that frequently change based on indexing, algorithm updates, geolocation, personalization, and search-engine rotation. If copied and pasted at a later time, these URLs will likely not open the same content or may fail to open at all. Accordingly, reliance should be made on the authenticated screenshot exhibits included herein as the accurate representation of the content as it appeared on the date and time of capture.

** Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

EXHIBIT 1-D

EXHIBIT 1-D

Google search results for "Ligia Parmenter, Esq." showing Defendant Watters' **manufactured Snippets** occupying the top four indexed positions with his defamatory **false statements**.

(Google Search- Result)

The screenshot displays four search results for the query "Ligia Parmenter, Esq.". Each result is from the website of Andrew Watters, except for the third result which is from UniCourt. The results contain several instances of text that have been highlighted in yellow, which are the "manufactured snippets" mentioned in the text above. The snippets are: "this crazy attorney", "typical batshit-insane filing", "should not be practicing law due to her various issues", "Timeshare RICO scam", and "Mexican timeshare scam".

Andrew Watters
<https://www.andrewwatters.com> › [hall-of-shame](#) › [ligia-p...](#) ⋮

Ligia Parmenter, Esq.

March 7, 2024. **Ligia Parmenter, Esq.** I finally have had enough of **this crazy attorney**. Coming soon.
Update June 26, 2024: check out this typical ...

Andrew Watters
<https://www.andrewwatters.com> › [ligia-parmenter](#) PDF ⋮

Parmenter-sample-filing.pdf

Jun 25, 2024 – **Ligia Parmenter, Esq.** I finally have had enough of **this crazy attorney**. Coming soon. Back to **Hall of Shame**. RJN, Exhibit C.
20 pages

UniCourt
<https://unicourt.com> › [case](#) ⋮

LIGIA PARMENTER vs ANDREW G WATTERS

Ligia Parmenter, Esq. I finally have had enough of **this crazy attorney**. Coming soon. Update June 26, 2024 : check out this **typical batshit-insane filing**...

Andrew Watters
<https://www.andrewwatters.com> › [hall-of-shame](#) ⋮

Andy's Hall of Shame

Ligia Parmenter, Esq. - **should not be practicing law** due to her **various issues**. **Timeshare RICO scam** - I uncovered this **Mexican timeshare scam** where they use ...

* Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.

Description:	Google search results for “Ligia Parmenter, Esq.” showing Defendant Watters’ manufactured Snippets occupying the top four indexed positions with his defamatory false statements .
Source / URL:	"LIGIA PARMENTER, ESQ" - Google Search - please see below
Captured by:	Captured using Snagit (TechSmith) — Software v2024.1.2. by Ligia M. Parmenter
Date Captured:	November 29, 2025 at 12:13 p.m. PST
True and Correct Copy:	Yes — authenticated in declaration.

"LIGIA PARMENTER, ESQ" - Google Search

https://www.google.com/search?q=%22LIGIA+PARMENTER%2C+ESQ%22&oq=%22ligia+&gs_lcrp=EgRlZGdlKgYIAhBFGDsyCQgAEEUYOxj5BzIGCAEQRRg5MgYIAhBFGDsyBwgDEAAyGAYgAqyBwgEEAAyGAYgAqyBwgFEAAyGAYgBggGEEUYPDIGCAcQRRg8MgYICBBFGDzSAQg2NDQwajBqNKgCALACAQ&sourceid=chrome&ie=UTF-8

****NOTICE:** Search-engine snippet URLs (Google, Bing, Yahoo, DuckDuckGo, etc.) are dynamically generated, non-static links that frequently change based on indexing, algorithm updates, geolocation, personalization, and search-engine rotation. If copied and pasted at a later time, these URLs will likely not open the same content or may fail to open at all. Accordingly, reliance should be made on the authenticated screenshot exhibits included herein as the accurate representation of the content as it appeared on the date and time of capture.

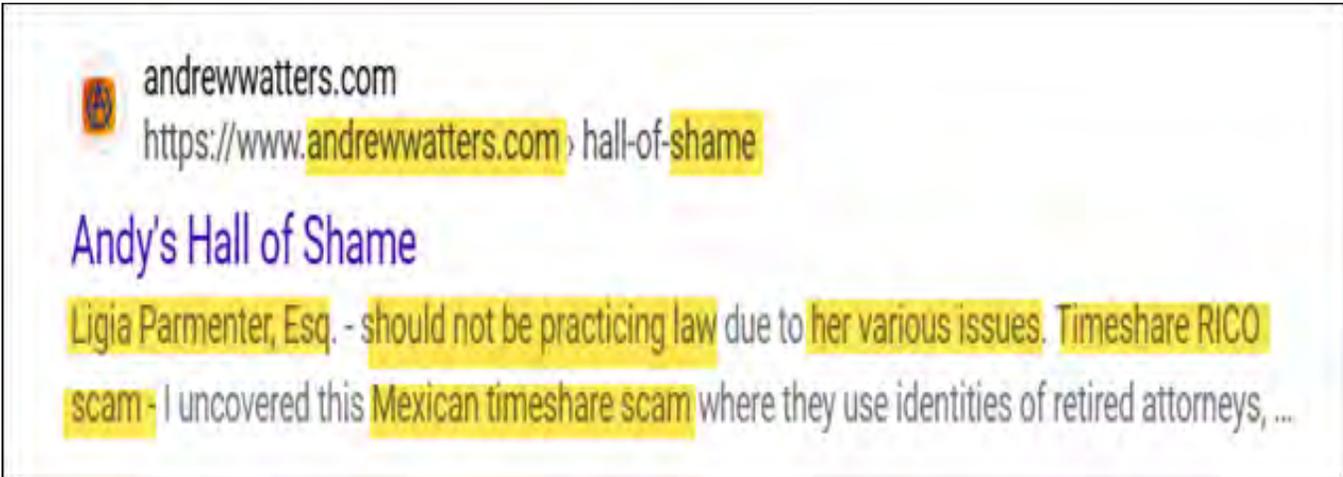
** Highlighting (if any) added for the Court’s convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

EXHIBIT 1-E

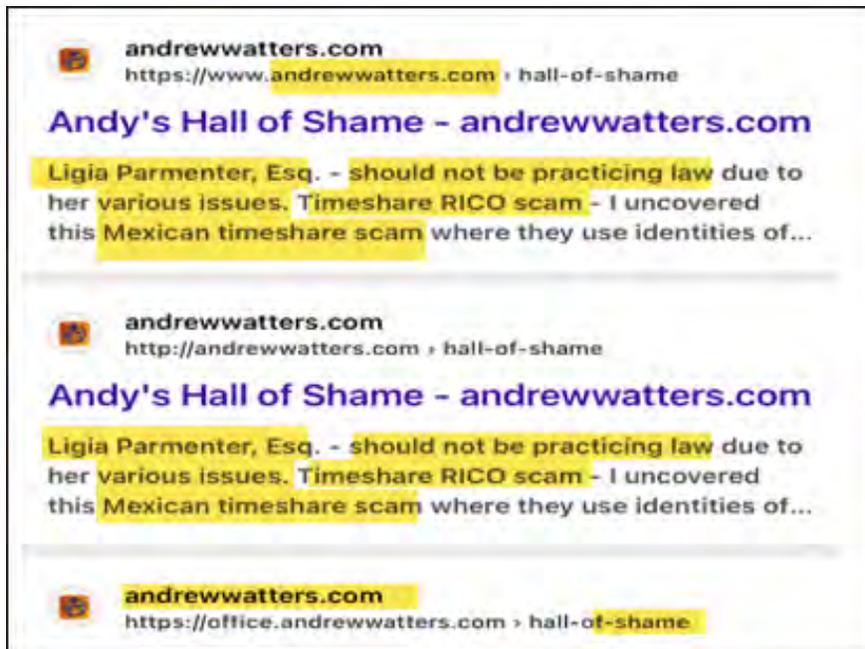
EXHIBIT 1-E

Bing search result Snippets manufactured by Watters falsely accusing Plaintiff of RICO (Racketeer Influenced and Corrupt Organizations Act) criminality in Mexico and unlawful practice of law.

(Laptop View of Bing Search)



(iPhone Mobile View of Bing Search)



* Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.

Description:	Bing search result Snippets manufactured by Watters falsely accusing Plaintiff of RICO (Racketeer Influenced and Corrupt Organizations Act) criminality in Mexico and unlawful practice of law.
Source / URL:	"LIGIA PARMENTER, ESQ" – Search - please see below
Captured by:	Captured using Snagit (TechSmith) — Software v2024.1.2. by Ligia M. Parmenter; iPhone Screenshot captured on Apple iPhone device by Ligia M. Parmenter, using the native iOS screenshot function (hardware button capture).
Date Captured:	November 20, 2025 at 3:24 p.m. PST
True and Correct Copy:	Yes — authenticated in declaration.

"LIGIA PARMENTER, ESQ" - Search

<https://www.bing.com/search?q=%22LIGIA+PARMENTER%2c+ESQ%22&sp=-1&lq=0&pq=%22ligia+parmenter%2c+esq%22&sc=11-22&q&s=n&sk=&cvid=34923D2F7FD7431FB629AB73022EFC12&FPIG=BF3FF569E75E46918BA15B65407C4B9E&first=6&FORM=PORE>

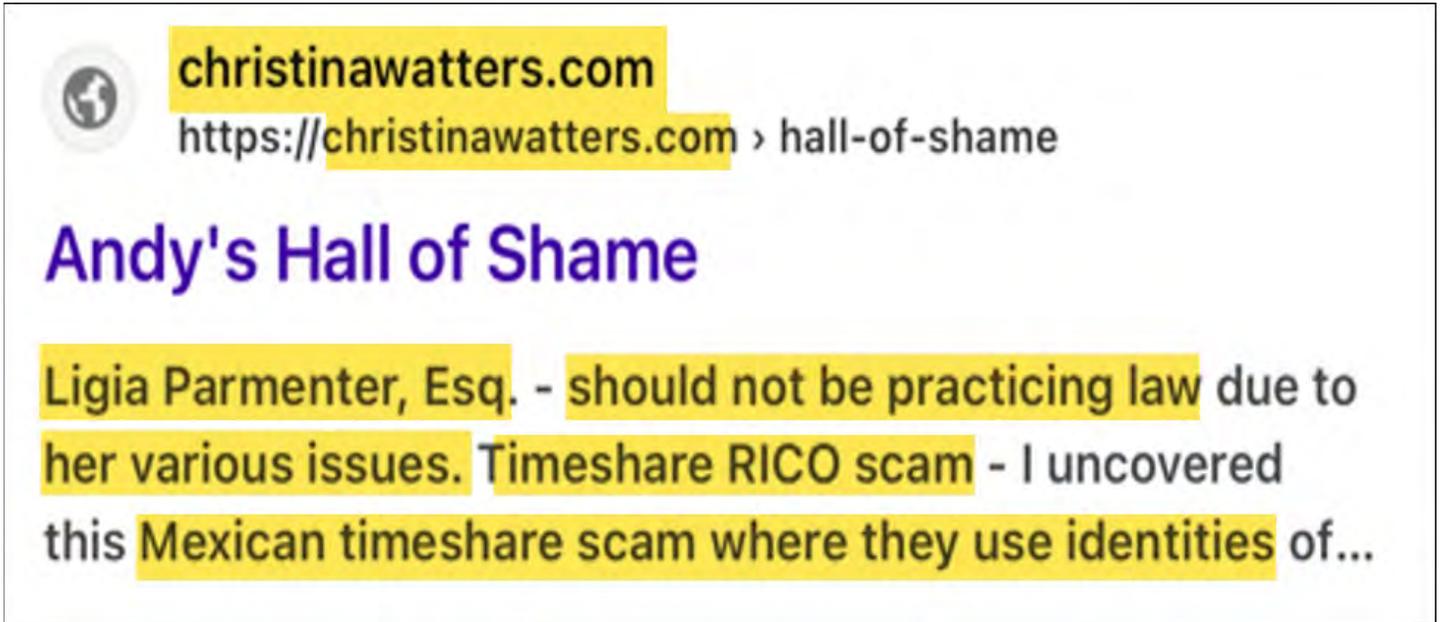
****NOTICE:** Search-engine snippet URLs (Google, Bing, Yahoo, DuckDuckGo, etc.) are dynamically generated, non-static links that frequently change based on indexing, algorithm updates, geolocation, personalization, and search-engine rotation. If copied and pasted at a later time, these URLs will likely not open the same content or may fail to open at all. Accordingly, reliance should be made on the authenticated screenshot exhibits included herein as the accurate representation of the content as it appeared on the date and time of capture.

** Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

EXHIBIT 1-F

EXHIBIT 1-F

Bing search result snippets published by Christina Chung Watters, - an employee and CFO of Watters' law office, targeting Plaintiff with defamatory content **and falsely accusing her of Racketeer Influenced and Corrupt Organizations Act criminality**



Description:

Bing search result snippets published by Christina Chung Watters, - an employee and CFO of Watters' law office, targeting Plaintiff with

* Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.

defamatory content **and falsely accusing her of Racketeer Influenced and Corrupt Organizations Act criminality**

Source / URL:

"LIGIA PARMENTER, ESQ" – Search - please see below

Captured by:

Captured using Snagit (TechSmith) — Software v2024.1.2. by Ligia M. Parmenter

Date Captured:

November 20, 2025 at 3:24 p.m. PST

True and Correct Copy:

Yes — authenticated in declaration.

"LIGIA PARMENTER, ESQ" - Search

<https://www.bing.com/search?q=%22LIGIA+PARMENTER%2c+ESQ%22&sp=1&lq=0&pq=%22ligia+parmenter%2c+esq%22&sc=11-22&q&sk=&cvid=34923D2F7FD7431FB629AB73022EFC12&FPIG=BF3FF569E75E46918BA15B65407C4B9E&first=6&FORM=PORE>

****NOTICE:** Search-engine snippet URLs (Google, Bing, Yahoo, DuckDuckGo, etc.) are dynamically generated, non-static links that frequently change based on indexing, algorithm updates, geolocation, personalization, and search-engine rotation. If copied and pasted at a later time, these URLs will likely not open the same content or may fail to open at all. Accordingly, reliance should be made on the authenticated screenshot exhibits included herein as the accurate representation of the content as it appeared on the date and time of capture.

** Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

EXHIBIT 1-G

EXHIBIT 1-G

Archived copy of Defendant Watters' law office website identifying Christina Chung Watters as Chief Financial Officer (CFO) of his law office.



** Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

Description: Archived copy of Defendant Watters' law office website identifying Christina Chung Watters as Chief Financial Officer (CFO) of his law office.

Source / URL: <https://www.andrewwatters.com>

Captured by: Captured using Snagit (TechSmith) — Software v2024.1.2. by Ligia M. Parmenter

True and Correct Copy: Yes — authenticated in declaration.

Archival: **Archived Webpage Capture (Wayback Machine)**
Source: Internet Archive, Wayback Machine
Original URL: <https://www.andrewwatters.com>
Archived URL:
<https://web.archive.org/web/20240304011435/http://andrewwatters.com/law/>
Date Archived: March 4, 2024
Date Accessed by Declarant: December 13, 2025 at 9:37 a.m. PST
Captured and preserved by Plaintiff using the Internet Archive Wayback Machine

** Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

EXHIBIT 1-H

EXHIBIT 1-H

Bing search result Snippets manufactured by Watters falsely claiming that Plaintiff is intellectually deficient, mentally unstable, and unlawfully practicing law through repeated online publication.

 [andrewwatters.com](https://www.andrewwatters.com)
<https://www.andrewwatters.com> › [hall-of-shame](#) › [ligia-parmenter](#)
Ligia Parmenter, Esq. - andrewwatters.com
Ligia Parmenter, Esq. I finally have had enough of this crazy attorney. Coming soon. Update June 26, 2024: check out this typical batshit-insane filing from her. She should not be practicing law. ...

* Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.

Description:	Bing search result Snippets manufactured by Watters falsely claiming that Plaintiff is intellectually deficient, mentally unstable, and unlawfully practicing law through repeated online publication.
Source / URL:	"LIGIA PARMENTER, ESQ" – Search - please below
Captured by:	Captured using Snagit (TechSmith) — Software v2024.1.2. by Ligia M. Parmenter
Date Captured:	November 20, 2025 at 3:24 p.m. PST
True and Correct Copy:	Yes — authenticated in declaration.

"LIGIA PARMENTER, ESQ" - Search

<https://www.bing.com/search?q=%22LIGIA+PARMENTER%2c+ESQ%22&sp=1&lq=0&pq=%22ligia+parmenter%2c+esq%22&sc=11-22&qs=n&sk=&cvid=34923D2F7FD7431FB629AB73022EFC12&FPIG=BF3FF569E75E46918BA15B65407C4B9E&first=6&FORM=PORE>

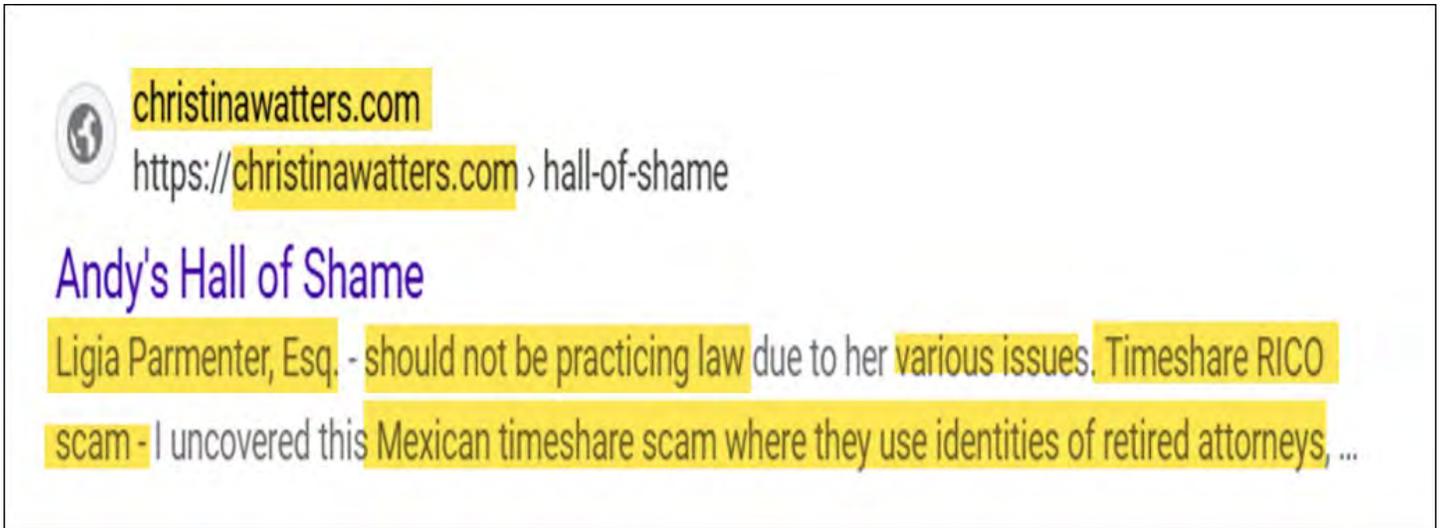
****NOTICE:** Search-engine snippet URLs (Google, Bing, Yahoo, DuckDuckGo, etc.) are dynamically generated, non-static links that frequently change based on indexing, algorithm updates, geolocation, personalization, and search-engine rotation. If copied and pasted at a later time, these URLs will likely not open the same content or may fail to open at all. Accordingly, reliance should be made on the authenticated screenshot exhibits included herein as the accurate representation of the content as it appeared on the date and time of capture.

** Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

EXHIBIT 1-I

EXHIBIT 1-I

Bing search result snippets originating from ChristinaWatters.com, published by Christina Chung Watters, who identifies herself as CFO of Watters' law office and a California-licensed real estate broker.



* Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.

Description:	Bing search result snippets originating from ChristinaWatters.com, published by Christina Chung Watters, who identifies herself as CFO of Watters' law office and a California-licensed real estate broker.
Source / URL:	"LIGIA PARMENTER, ESQ" – Search - please below
Captured by:	Ligia Parmenter, Esq.
Date Captured:	November 20, 2025 at 3:24 p.m. PST
True and Correct Copy:	Yes — authenticated in declaration.

"LIGIA PARMENTER, ESQ" - Search

<https://www.bing.com/search?q=%22LIGIA+PARMENTER%2c+ESQ%22&sp=1&lq=0&pq=%22ligia+parmenter%2c+esq%22&sc=11-22&qsn=&sk=&cvid=34923D2F7FD7431FB629AB73022EFC12&FPIG=BF3FF569E75E46918BA15B65407C4B9E&first=6&FORM=PORE>

****NOTICE:** Search-engine snippet URLs (Google, Bing, Yahoo, DuckDuckGo, etc.) are dynamically generated, non-static links that frequently change based on indexing, algorithm updates, geolocation, personalization, and search-engine rotation. If copied and pasted at a later time, these URLs will likely not open the same content or may fail to open at all. Accordingly, reliance should be made on the authenticated screenshot exhibits included herein as the accurate representation of the content as it appeared on the date and time of capture.

** Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

EXHIBIT 1-J

EXHIBIT 1-J

Bing search results for “Ligia Parmenter, Esq.” showing six (6) uninterrupted, back-to-back Watters-manufactured defamatory Snippets, demonstrating unlawful electronic cyber-harassment and search-engine manipulation (Cal. Penal Code § 653.2(a)-(c)(1)-(2)).

(Bing Search-Engine view)

The screenshot displays six identical search results from 'andrewwatters.com'. Each result includes the URL 'https://www.andrewwatters.com > hall-of-shame', the title 'Andy's Hall of Shame - andrewwatters.com', and a snippet of text: 'Ligia Parmenter, Esq. - should not be practicing law due to her various issues. Timeshare RICO scam - I uncovered this Mexican timeshare scam where they use identities of retired attorneys, ...'. The text in the snippets is highlighted in yellow.

* Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.

Description:	Bing search results for "Ligia Parmenter, Esq." showing six (6) uninterrupted, back-to-back Watters-manufactured defamatory Snippets, demonstrating unlawful electronic cyber-harassment and search-engine manipulation (Cal. Penal Code § 653.2(a)-(c)(1)-(2)).
Source / URL:	"LIGIA PARMENTER, ESQ" – Search - please below
Captured by:	Captured using Snagit (TechSmith) — Software v2024.1.2. by Ligia M. Parmenter
Date Captured:	December 15, 2025 at 3:24 p.m. PST
True and Correct Copy:	Yes — authenticated in declaration.

"LIGIA PARMENTER, ESQ" - Search

<https://www.bing.com/search?q=%22ligia+parmenter%2c+esq.%22&q=HS&sc=10-0&cvid=85CD19D603724EB9A970F50E44864F32&sp=1&lq=0&FPIG=BD8240711BA94A71864F5B57E71E7DB7&first=11&FORM=PQRE>

****NOTICE:** Search-engine snippet URLs (Google, Bing, Yahoo, DuckDuckGo, etc.) are dynamically generated, non-static links that frequently change based on indexing, algorithm updates, geolocation, personalization, and search-engine rotation. If copied and pasted at a later time, these URLs will likely not open the same content or may fail to open at all. Accordingly, reliance should be made on the authenticated screenshot exhibits included herein as the accurate representation of the content as it appeared on the date and time of capture.

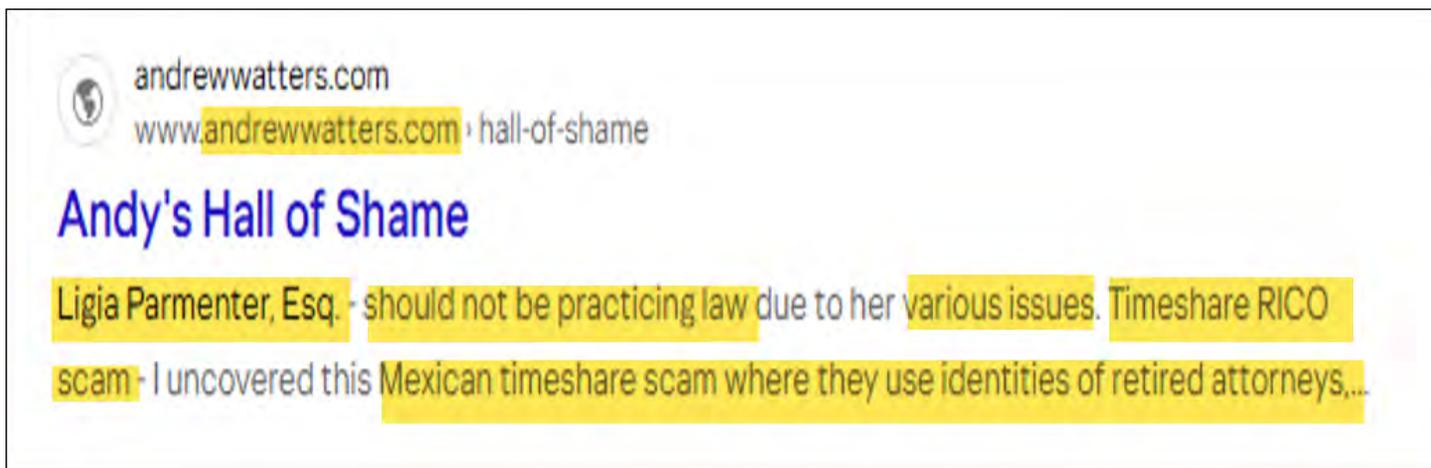
** Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

EXHIBIT 1-K

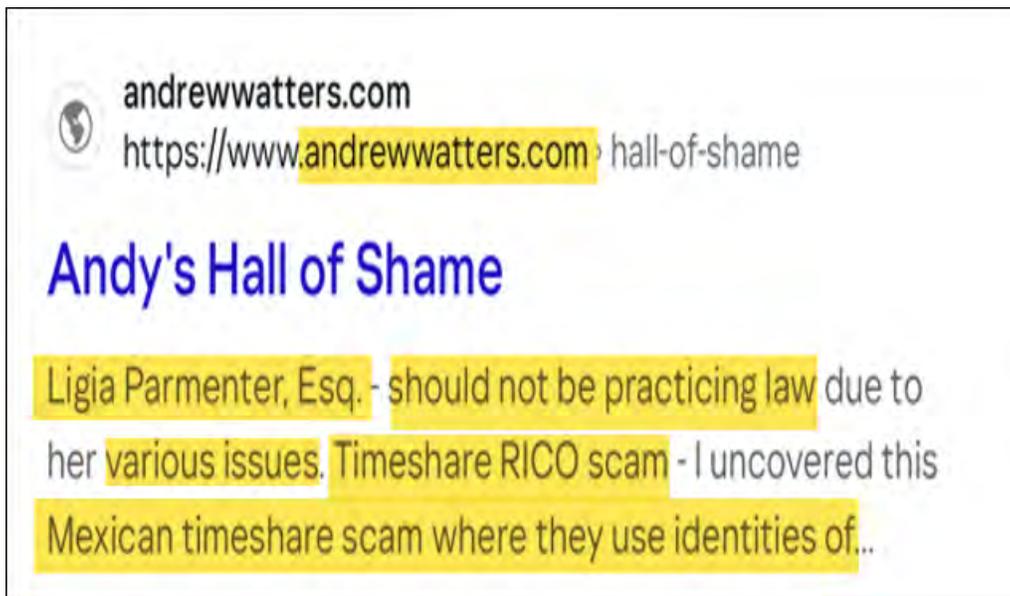
EXHIBIT 1-K

Yahoo search result Dnippets manufactured by Watters falsely accusing Plaintiff of RICO (Racketeer Influenced and Corrupt Organizations Act) criminality in Mexico and constituting electronic cyber-harassment (Cal. Penal Code § 653.2(a)-(c)(1)-(2)).

(Laptop View of Yahoo Search)



(iPhone Mobile View of Yahoo Search)



* Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.

Description:	Yahoo search result Dnippets manufactured by Watters falsely accusing Plaintiff of RICO (Racketeer Influenced and Corrupt Organizations Act) criminality in Mexico and constituting electronic cyber-harassment (Cal. Penal Code § 653.2(a)-(c)(1)-(2)).
Source / URL:	LIGIA PARMENTER, ESQ. - Yahoo Search Results – Search - please see below
Captured by:	Captured using Snagit (TechSmith) — Software v2024.1.2. by Ligia M. Parmenter; iPhone Screenshot captured on Apple iPhone device by Ligia M. Parmenter, using the native iOS screenshot function (hardware button capture).
Date Captured:	November 20, 2025 at 4:54 p.m. PST
True and Correct Copy:	Yes — authenticated in declaration.

LIGIA PARMENTER, ESQ. - Yahoo Search Results

https://search.yahoo.com/search;_ylt=Awr9_bbvwytpph8ZDIFXNyoA;_ylu=Y29sbwNncTEEcG9zAzEEdnRpZAMEc2VjA3BhZ2luYXRpb24-?fr=yfp-t&fr2=p%3Afp%2Cm%3Asb&fp=1&p=%22LIGIA+PARMENTER%2C+ESQ.%22&b=1&pz=7&bct=0&xargs=0

****NOTICE:** Search-engine snippet URLs (Google, Bing, Yahoo, DuckDuckGo, etc.) are dynamically generated, non-static links that frequently change based on indexing, algorithm updates, geolocation, personalization, and search-engine rotation. If copied and pasted at a later time, these URLs will likely not open the same content or may fail to open at all. Accordingly, reliance should be made on the authenticated screenshot exhibits included herein as the accurate representation of the content as it appeared on the date and time of capture.

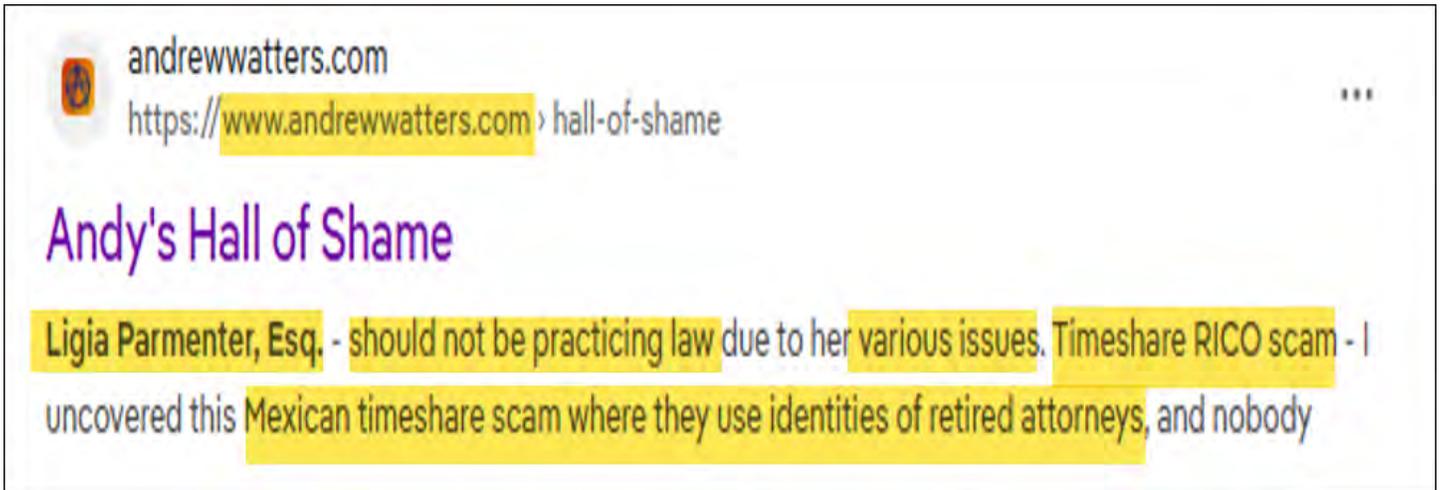
** Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

EXHIBIT 1-L

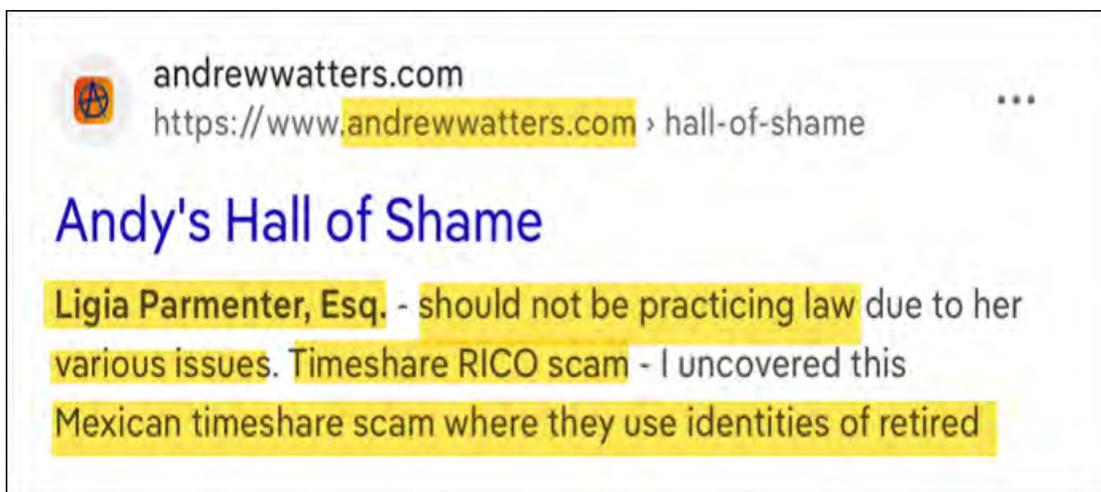
EXHIBIT 1-L

DuckDuckGo search result Snippets manufactured by Watters falsely accusing Plaintiff of RICO (Racketeer Influenced and Corrupt Organizations Act) criminality in Mexico and constituting electronic cyber-harassment (Cal. Penal Code § 653.2(a)-(c)(1)-(2)).

(Laptop View of DuckDuckGo Search)



(iPhone View of DuckDuckGo Search)



* Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.

Description:	DuckDuckGo search result Snippets manufactured by Watters falsely accusing Plaintiff of RICO (Racketeer Influenced and Corrupt Organizations Act) criminality in Mexico and constituting electronic cyber-harassment (Cal. Penal Code § 653.2(a)-(c)(1)-(2)).
Source / URL:	"LIGIA PARMENTER, ESQ." at DuckDuckGo – Search - please see below
Captured by:	Captured using Snagit (TechSmith) — Software v2024.1.2. by Ligia M. Parmenter; iPhone Screenshot captured on Apple iPhone device by Ligia M. Parmenter, using the native iOS screenshot function (hardware button capture).
Date Captured:	November 29, 2025 at 8:27 p.m. PST
True and Correct Copy:	Yes — authenticated in declaration.

"LIGIA PARMENTER, ESQ." at DuckDuckGo

https://duckduckgo.com/?origin=funnel_home_google&t=h_&q=%22LIGIA+PARMENTER%2C+ESQ.%22&ia=web

****NOTICE:** Search-engine snippet URLs (Google, Bing, Yahoo, DuckDuckGo, etc.) are dynamically generated, non-static links that frequently change based on indexing, algorithm updates, geolocation, personalization, and search-engine rotation. If copied and pasted at a later time, these URLs will likely not open the same content or may fail to open at all. Accordingly, reliance should be made on the authenticated screenshot exhibits included herein as the accurate representation of the content as it appeared on the date and time of capture.

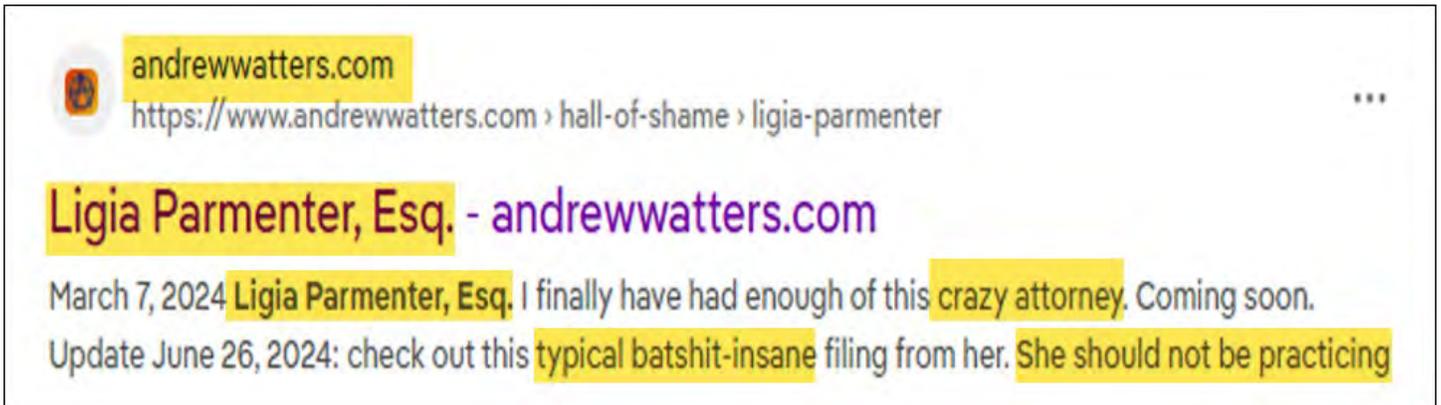
** Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

EXHIBIT 1-M

EXHIBIT 1-M

DuckDuckGo search result snippets manufactured by Watters falsely claiming that Plaintiff is intellectually deficient and mentally unstable, constituting electronic cyber-harassment (Cal. Penal Code § 653.2(a)-(c)(1)-(2)).

(Laptop View of DuckDuckGo Search)



The screenshot shows a search result for 'andrewwatters.com'. The URL is 'https://www.andrewwatters.com › hall-of-shame › ligia-parmenter'. The title is 'Ligia Parmenter, Esq. - andrewwatters.com'. The text below the title reads: 'March 7, 2024 Ligia Parmenter, Esq. I finally have had enough of this crazy attorney. Coming soon. Update June 26, 2024: check out this typical batshit-insane filing from her. She should not be practicing'.

(iPhone View of DuckDuckGo Search)



The screenshot shows a search result for 'andrewwatters.com'. The URL is 'https://www.andrewwatters.com › hall-of-shame › ligi...'. The title is 'Ligia Parmenter, Esq. - andrewwatters.com'. The text below the title reads: 'March 7, 2024 Ligia Parmenter, Esq. I finally have had enough of this crazy attorney. Coming soon. Update June 26, 2024: check out this typical batshit-insane filing from her. She should'.

* Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.

Description:	DuckDuckGo search result snippets manufactured by Watters falsely claiming that Plaintiff is intellectually deficient and mentally unstable, constituting electronic cyber-harassment (Cal. Penal Code § 653.2(a)-(c)(1)-(2)).
Source / URL:	"LIGIA PARMENTER, ESQ." at DuckDuckGo– Search - please see below
Captured by:	Captured using Snagit (TechSmith) — Software v2024.1.2. by Ligia M. Parmenter; iPhone Screenshot captured on Apple iPhone device by Ligia M. Parmenter, using the native iOS screenshot function (hardware button capture).
Date Captured:	November 29, 2025 at 8:27 p.m. PST
True and Correct Copy:	Yes — authenticated in declaration.

"LIGIA PARMENTER, ESQ." at DuckDuckGo

https://duckduckgo.com/?origin=funnel_home_google&t=h_&q=%22LIGIA+PARMENTER%2C+ESQ.%22&ia=web

****NOTICE:** Search-engine snippet URLs (Google, Bing, Yahoo, DuckDuckGo, etc.) are dynamically generated, non-static links that frequently change based on indexing, algorithm updates, geolocation, personalization, and search-engine rotation. If copied and pasted at a later time, these URLs will likely not open the same content or may fail to open at all. Accordingly, reliance should be made on the authenticated screenshot exhibits included herein as the accurate representation of the content as it appeared on the date and time of capture.

** Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

EXHIBIT 1-N

EXHIBIT 1-N

ChatGPT-Generated “Red Flags” Artificially Public search content showing “red flags” appearing solely as a result of Watters’ electronic content manipulation and cyber-harassment campaign (Cal. Penal Code § 653.2(a)–(c)(1)–(2)).

! “Red Flags” or Criticisms That Appear in That Public Search Context

From what’s accessible in the public domain (mostly via Watters’s site and the case listing), the main “red flags” or allegations against Parmenter include:

- A claim that Parmenter “should not be practicing law” due to “various issues.”
[andrewwatters.com](#)
- Allegations tied to a “timeshare RICO scam,” mentioned in the same context — although the nature of the alleged involvement (direct, indirect, or structural) is unclear. [andrewwatters.com](#)
- The availability of a “sample filing” (the PDF) suggests that there may be specific legal or factual claims being advanced by Watters against Parmenter.
[andrewwatters.com](#)

* Highlighting (if any) added for the Court’s convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.

Description: ChatGPT-Generated “Red Flags” Artificially Public search content showing “red flags” appearing solely as a result of Watters’ electronic content manipulation and cyber-harassment campaign (Cal. Penal Code § 653.2(a)–(c)(1)–(2)).

Source / URL: "LIGIA PARMENTER, ESQ." at CHAT GPT–
<https://chatgpt.com/>

Captured by: Captured using Snagit (TechSmith) — Software v2024.1.2. by I. Parmenter

Date Captured: November 29, 2025 at 8:47 p.m. PST

True and Correct Copy: Yes — authenticated in declaration.

****NOTICE:** The attached screenshot reflects a search result generated by ChatGPT on the date and time of capture. ChatGPT responses are AI-generated and non-static, meaning the content, phrasing, and ranking of information may differ upon each new query, even when identical search terms are used.

** Highlighting (if any) added for the Court’s convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

EXHIBIT 1-0

EXHIBIT 1-O

Watters' Defamatory Snippets - Source Identifiers — Favicon Attribution - Watters' Law Office/ Legal Services. Each search-engine Snippet displays Watters' law-office Favicon, confirming the content originates from and is controlled by his commercial website, www.andrewwatters.com.



**Favicon shown above is a magnified enlargement for identification and clarity. The original search-engine snippet screenshot did not display the favicon at this size and did not display a red circle.

* *Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

Description:	Watters' Defamatory Snippets - Source Identifiers — Favicon Attribution – Watters' Law Office/ Legal Services_ Each search-engine Snippet displays Watters' law-office Favicon, confirming the content originates from and is controlled by his commercial website, www.andrewwatters.com.
Source / URL:	"LIGIA PARMENTER, ESQ" - Google Search - please see below
Captured by:	Captured using Snagit (TechSmith) — Software v2024.1.2. by Ligia M. Parmenter;
Date Captured:	December 27, 2025 at 7:27 a.m. PST
True and Correct Copy:	Yes — authenticated in declaration.

"LIGIA PARMENTER, ESQ" - Google Search

https://www.google.com/search?q=%22%3ALIGIA+PARMENTER%2C+ESQ.%22&sca_esv=a4c44c609eca2c0a&ei=w_pPafjFEZ6qur8P2bunWA&ved=0ahUKEwi4s9mgit6RAxUele4BHdndCQsQ4dUDCBE&uact=5&q=%22%3ALIGIA+PARMENTER%2C+ESQ.%22&gs_lp=Egxnd3Mtd2l6LXNlcniGCI6TEIHSUEgUEFSTUVOVEVSLCBFU1EuIjIGEAAYFhgeMggQABiABBiiBDIIEAAyGAYogQyCBAAGIAEGKIEMggQABiABBiiBDIIEAAyGAYogRI1TxQgwtYqylwAXgAkAEAmAGyAqABvgWqAQcwLjMuMC4xuAEDyAEA-AEBmAlFoALYBcICBxAAGLADGB7CAgsQABiABBiwAxiiBMICBBAAGB6YAwCIBgGQBgWSBwexLjMuMC4xoAfWC7IHBzAuMy4wLjG4B9UFwgcFMC4xLjTIBxGACAA&sclient=gws-wiz-serp

****NOTICE:** Search-engine snippet URLs (Google, Bing, Yahoo, DuckDuckGo, etc.) are dynamically generated, non-static links that frequently change based on indexing, algorithm updates, geolocation, personalization, and search-engine rotation. If copied and pasted at a later time, these URLs will likely not open the same content or may fail to open at all. Accordingly, reliance should be made on the authenticated screenshot exhibits included herein as the accurate representation of the content as it appeared on the date and time of capture.

** Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

EXHIBIT 1-P

Andrew Watters — Cyber-Stalking & Electronic Harassment

7-Day Cyber-Harassment & Cyber-Stalking Log

Reporting Party: Ligia Parmenter, Esq., San Rafael, California

Date	Time	Platform	Incident
Dec. 27, 2025	07:44	Google	Andrew Watters' false-harassing snippets observed again- unwanted /nonconsensual
Dec. 27, 2025	07:38	Bing	Andrew Watters' false-harassing snippets observed again- unwanted /nonconsensual
Dec. 27, 2025	07:41	Yahoo	Andrew Watters' false-harassing snippets observed again- unwanted /nonconsensual
Dec. 27, 2025	07:43	DuckDuckGo	Andrew Watters' false-harassing snippets observed again- unwanted /nonconsensual
Dec. 27, 2025	10:48	Google	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Dec. 27, 2025	10:53	Bing	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Dec. 27, 2025	10:58	Yahoo	Andrew Watters' false-harassing snippets observed again- unwanted /nonconsensual
Dec. 27, 2025	11:03	DuckDuckGo	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Dec. 27, 2025	14:17	Google	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Dec. 27, 2025	14:21	Bing	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Dec. 27, 2025	14:26	Yahoo	Andrew Watters' false-harassing snippets observed again- unwanted /nonconsensual
Dec. 27, 2025	14:31	DuckDuckGo	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Dec. 27, 2025	18:12	Google	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Dec. 27, 2025	18:17	Bing	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Dec. 27, 2025	18:23	Yahoo	Andrew Watters' false-harassing snippets observed again- unwanted /nonconsensual
Dec. 27, 2025	18:27	DuckDuckGo	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Dec. 28, 2025	08:02	Google	Andrew Watters' false-harassing snippets observed again- unwanted /nonconsensual
Dec. 28, 2025	08:09	Bing	Andrew Watters' false-harassing snippets observed again- unwanted /nonconsensual
Dec. 28, 2025	08:11	Yahoo	Andrew Watters' false-harassing snippets observed again- unwanted /nonconsensual
Dec. 28, 2025	08:17	DuckDuckGo	Andrew Watters' false-harassing snippets observed again- unwanted /nonconsensual
Dec. 28, 2025	11:12	Google	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Dec. 28, 2025	11:19	Bing	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Dec. 28, 2025	11:24	Yahoo	Andrew Watters' false-harassing snippets observed again- unwanted /nonconsensual
Dec. 28, 2025	11:31	DuckDuckGo	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Dec. 28, 2025	15:02	Google	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Dec. 28, 2025	15:09	Bing	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Dec. 28, 2025	15:16	Yahoo	Andrew Watters' false-harassing snippets observed again- unwanted /nonconsensual
Dec. 28, 2025	15:21	DuckDuckGo	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Dec. 28, 2025	18:42	Google	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Dec. 28, 2025	18:51	Bing	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Dec. 28, 2025	18:55	Yahoo	Andrew Watters' false-harassing snippets observed again- unwanted /nonconsensual
Dec. 28, 2025	18:59	DuckDuckGo	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Dec. 29, 2025	07:47	Google	Andrew Watters' false-harassing snippets observed again- unwanted /nonconsensual
Dec. 29, 2025	07:53	Bing	Andrew Watters' false-harassing snippets observed again- unwanted /nonconsensual
Dec. 29, 2025	07:57	Yahoo	Andrew Watters' false-harassing snippets observed again- unwanted /nonconsensual
Dec. 29, 2025	08:03	DuckDuckGo	Andrew Watters' false-harassing snippets observed again- unwanted /nonconsensual
Dec. 29, 2025	10:27	Google	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Dec. 29, 2025	10:33	Bing	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Dec. 29, 2025	10:39	Yahoo	Andrew Watters' false-harassing snippets observed again- unwanted /nonconsensual
Dec. 29, 2025	10:42	DuckDuckGo	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Dec. 29, 2025	15:41	Google	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Dec. 29, 2025	15:45	Bing	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Dec. 29, 2025	15:51	Yahoo	Andrew Watters' false-harassing snippets observed again- unwanted /nonconsensual
Dec. 29, 2025	15:59	DuckDuckGo	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Dec. 29, 2025	19:42	Google	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Dec. 29, 2025	19:50	Bing	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Dec. 29, 2025	19:54	Yahoo	Andrew Watters' false-harassing snippets observed again- unwanted /nonconsensual
Dec. 29, 2025	20:02	DuckDuckGo	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Dec. 30, 2025	07:02	Google	Andrew Watters' false-harassing snippets observed again- unwanted /nonconsensual
Dec. 30, 2025	07:08	Bing	Andrew Watters' false-harassing snippets observed again- unwanted /nonconsensual

Above unwanted/nonconsensual conduct from Andrew Watters commenced on or about March 7, 2024 and is ongoing and continuous.

This log is submitted to document a repeated course of electronic cyber-harassment-conduct under Cal. Penal Code §§ 653.2; § 646.9(a);(e)-(h)

Andrew Watters — Cyber-Stalking & Electronic Harassment

7-Day Cyber-Harassment & Cyber-Stalking Log

Reporting Party: Ligia Parmenter, Esq., San Rafael, California

Dec. 30, 2025	07:14	Yahoo	Andrew Watters' false-harassing snippets observed again- unwanted /nonconsensual
Dec. 30, 2025	07:21	DuckDuckGo	Andrew Watters' false-harassing snippets observed again- unwanted /nonconsensual
Dec. 30, 2025	11:12	Google	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Dec. 30, 2025	11:18	Bing	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Dec. 30, 2025	11:26	Yahoo	Andrew Watters' false-harassing snippets observed again- unwanted /nonconsensual
Dec. 30, 2025	11:32	DuckDuckGo	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Dec. 30, 2025	15:08	Google	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Dec. 30, 2025	15:13	Bing	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Dec. 30, 2025	15:21	Yahoo	Andrew Watters' false-harassing snippets observed again- unwanted /nonconsensual
Dec. 30, 2025	15:28	DuckDuckGo	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Dec. 30, 2025	20:09	Google	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Dec. 30, 2025	20:13	Bing	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Dec. 30, 2025	20:21	Yahoo	Andrew Watters' false-harassing snippets observed again- unwanted /nonconsensual
Dec. 30, 2025	20:25	DuckDuckGo	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Dec. 31, 2025	08:32	Google	Andrew Watters' false-harassing snippets observed again- unwanted /nonconsensual
Dec. 31, 2025	08:35	Bing	Andrew Watters' false-harassing snippets observed again- unwanted /nonconsensual
Dec. 31, 2025	08:39	Yahoo	Andrew Watters' false-harassing snippets observed again- unwanted /nonconsensual
Dec. 31, 2025	08:43	DuckDuckGo	Andrew Watters' false-harassing snippets observed again- unwanted /nonconsensual
Dec. 31, 2025	11:43	Google	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Dec. 31, 2025	11:49	Bing	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Dec. 31, 2025	11:51	Yahoo	Andrew Watters' false-harassing snippets observed again- unwanted /nonconsensual
Dec. 31, 2025	11:57	DuckDuckGo	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Dec. 31, 2025	15:17	Google	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Dec. 31, 2025	15:23	Bing	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Dec. 31, 2025	15:27	Yahoo	Andrew Watters' false-harassing snippets observed again- unwanted /nonconsensual
Dec. 31, 2025	15:37	DuckDuckGo	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Dec. 31, 2025	20:26	Google	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Dec. 31, 2025	20:34	Bing	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Dec. 31, 2025	20:38	Yahoo	Andrew Watters' false-harassing snippets observed again- unwanted /nonconsensual
Dec. 31, 2025	20:42	DuckDuckGo	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Jan. 01, 2026	07:11	Google	Andrew Watters' false-harassing snippets observed again- unwanted /nonconsensual
Jan. 01, 2026	07:17	Bing	Andrew Watters' false-harassing snippets observed again- unwanted /nonconsensual
Jan. 01, 2026	07:24	Yahoo	Andrew Watters' false-harassing snippets observed again- unwanted /nonconsensual
Jan. 01, 2026	07:30	DuckDuckGo	Andrew Watters' false-harassing snippets observed again- unwanted /nonconsensual
Jan. 01, 2026	11:21	Google	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Jan. 01, 2026	11:26	Bing	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Jan. 01, 2026	11:31	Yahoo	Andrew Watters' false-harassing snippets observed again- unwanted /nonconsensual
Jan. 01, 2026	11:37	DuckDuckGo	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Jan. 01, 2026	15:41	Google	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Jan. 01, 2026	15:45	Bing	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Jan. 01, 2026	15:52	Yahoo	Andrew Watters' false-harassing snippets observed again- unwanted /nonconsensual
Jan. 01, 2026	15:57	DuckDuckGo	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Jan. 01, 2026	20:02	Google	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Jan. 01, 2026	20:09	Bing	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Jan. 01, 2026	20:14	Yahoo	Andrew Watters' false-harassing snippets observed again- unwanted /nonconsensual
Jan. 01, 2026	20:20	DuckDuckGo	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Jan. 02, 2026	08:27	Google	Andrew Watters' false-harassing snippets observed again- unwanted /nonconsensual
Jan. 02, 2026	08:34	Bing	Andrew Watters' false-harassing snippets observed again- unwanted /nonconsensual
Jan. 02, 2026	08:39	Yahoo	Andrew Watters' false-harassing snippets observed again- unwanted /nonconsensual
Jan. 02, 2026	08:42	DuckDuckGo	Andrew Watters' false-harassing snippets observed again- unwanted /nonconsensual
Jan. 02, 2026	10:02	Google	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual

Above unwanted/nonconsensual conduct from Andrew Watters commenced on or about March 7, 2024 and is ongoing and continuous.

This log is submitted to document a repeated course of electronic cyber-harassment-conduct under Cal. Penal Code §§ 653.2; § 646.9(a);(e)-(h)

Andrew Watters — Cyber-Stalking & Electronic Harassment

7-Day Cyber-Harassment & Cyber-Stalking Log

Reporting Party: Ligia Parmenter, Esq., San Rafael, California

Jan. 02, 2026	10:08	Bing	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Jan. 02, 2026	10:11	Yahoo	Andrew Watters' false-harassing snippets observed again- unwanted /nonconsensual
Jan. 02, 2026	10:19	DuckDuckGo	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Jan. 02, 2026	15:04	Google	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Jan. 02, 2026	15:21	Bing	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Jan. 02, 2026	15:26	Yahoo	Andrew Watters' false-harassing snippets observed again- unwanted /nonconsensual
Jan. 02, 2026	15:31	DuckDuckGo	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Jan. 02, 2026	20:26	Google	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Jan. 02, 2026	20:34	Bing	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual
Jan. 02, 2026	20:39	Yahoo	Andrew Watters' false-harassing snippets observed again- unwanted /nonconsensual
Jan. 02, 2026	20:43	DuckDuckGo	Andrew Watters' false-harassing snippets observed again- unwanted/ nonconsensual

Above unwanted/nonconsensual conduct from Andrew Watters commenced on or about March 7, 2024 and is ongoing and continuous.

This log is submitted to document a repeated course of electronic cyber-harassment-conduct under Cal. Penal Code §§ 653.2; § 646.9(a);(e)-(h)

EXHIBIT 2-A

Contreras-Sanchez v. Contreras-Sanchez

From: Andrew G. Watters (andrew@andrewwatters.com)

To: lparmenter@lawpar.com

Cc: jeramy@andrewwatters.com

Date: Tuesday, September 19, 2023 at 08:54 AM PDT

Dear Ms. Parmenter,

As you know, Jeramy and I represent the Defendant in this action.

We read your latest filing (reply on motion for reconsideration), and for this and other reasons we have serious concerns about your mental state. Your false statements of fact and your extensive inclusion of absolutely irrelevant matter, such as my lawsuit against Federal prisoner Mahsa Parviz and your claims about how I supposedly practice law, indicate that something is seriously wrong with you.

Mahsa is a nine-time felon who is in prison and is on a harassing crusade against me. I have every right to shame her online in a web page that is 100% true and 100% fair to her. And now I am providing you notice that I am likely going to shame you as well for your lunatic-level behavior.

My Hall of Shame web page about Zheng Liu states that he is "perhaps" the most insane, unfit licensed attorney in California. You are rapidly approaching that level, and I hope you will reconsider while there is still time to avoid having my potential Hall of Shame web page about you being higher-ranked on Google than your own website.

Best,

Andrew Watters

Andrew G. Watters
andrew@andrewwatters.com
+1 (415) 261-8527
<https://www.andrewwatters.com>

EXHIBIT 2-B

EXHIBIT 2-B

March 7, 2024 website posting by Watters announcing “COMING SOON,” threatening additional defamatory and cyber-harassing publications targeting Plaintiff.

ANDREW WATTERS

March 7, 2024

Ligia Parmenter, Esq.

I finally have had enough of this crazy attorney. Coming soon.

** Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

Description:	March 7, 2024 website posting by Watters announcing “COMING SOON,” threatening additional defamatory and cyber-harassing publications targeting Plaintiff.
Source / URL:	https://www.andrewwatters.com/hall-of-shame/ligia-parmenter/
Captured by:	Captured using Snagit (TechSmith) — Software v2024.1.2. by Ligia M. Parmenter
Date Captured:	November 30, 2025 at 12:24 p.m. PST
True and Correct Copy:	Yes — authenticated in declaration.
Perma.cc Archival	This exhibit has been permanently archived on Perma.cc to preserve its contents and ensure the integrity. Perma.cc URL : https://perma.cc/KKV2-MRFF

** Highlighting (if any) added for the Court’s convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

EXHIBIT 2-C

EXHIBIT 2-C

Screenshot of Watters' law-office branding ("Polite Gunfighter") appearing alongside "Hall of Shame" content, submitted solely to demonstrate the intimidating context contributing to Plaintiff's reasonable and sustained fear for personal safety, and not as a basis for defamation, firearm-related liability, or any independent claim.



** Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

Description:	Screenshot of Watters' law-office branding ("Polite Gunfighter") appearing alongside "Hall of Shame" content, submitted solely to demonstrate the intimidating context contributing to Plaintiff's reasonable and sustained fear for personal safety, and not as a basis for defamation, firearm-related liability, or any independent claim.
Source / URL:	https://www.andrewwatters.com
Captured by:	Captured using Snagit (TechSmith) — Software v2024.1.2. by Ligia M. Parmenter
Date Captured:	November 30, 2025 at 10:47 p.m. PST
True and Correct Copy:	Yes — authenticated in declaration.
Perma.cc Archival	This exhibit has been permanently archived on Perma.cc to preserve its contents and ensure the integrity. Perma.cc URL : https://perma.cc/AZ55-64SA

** Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

EXHIBIT 2-D

EXHIBIT 2-D

Screenshot of firearm-related imagery used in Watters' law-practice materials, submitted solely to demonstrate the intimidating context contributing to Plaintiff's reasonable and sustained fear for personal safety, and not as a basis for defamation, firearm-related liability, or any independent claim.



** Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

Description: Screenshot of firearm-related imagery used in Watters' law-practice materials, submitted solely to demonstrate the intimidating context contributing to Plaintiff's reasonable and sustained fear for personal safety, and not as a basis for defamation, firearm-related liability, or any independent claim.

Source / URL: <https://www.andrewwatters.com>

Captured by:
Ligia Parmenter, Esq.

Date Captured: Archived on December 25, 2024
Captured using Snagit (TechSmith) — Software v2024.1.2. by Ligia M. Parmenter on December 30, 2025 at 8:44 a.m. PST

True and Correct Copy:
Yes — authenticated in declaration.

Wayback Machine Archival This exhibit has been permanently archived on Wayback Machine to preserve its contents and ensure the integrity.
Permanent Archive Link:
<https://web.archive.org/web/20241225155319/https://www.politegunfighter.com/>

EXHIBIT 2-E

EXHIBIT 2-E

Screenshot showing Watters' use of an unauthorized FBI seal on his "Hall of Shame" webpage, submitted solely to demonstrate the intimidating context and implied authority contributing to Plaintiff's reasonable fear, and not as a basis for defamation, government-impersonation liability, or any independent claim.



** Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

Description: Screenshot showing Watters' use of an unauthorized FBI seal on his "Hall of Shame" webpage, submitted solely to demonstrate the intimidating context and implied authority contributing to Plaintiff's reasonable fear, and not as a basis for defamation, government-impersonation liability, or any independent claim.

Source / URL: <https://www.andrewwatters.com/hall-of-shame/FBI-SACU/>

Captured by: Ligia Parmenter, Esq.

Date Captured: December 16, 2025 at 8:33 a.m. PST

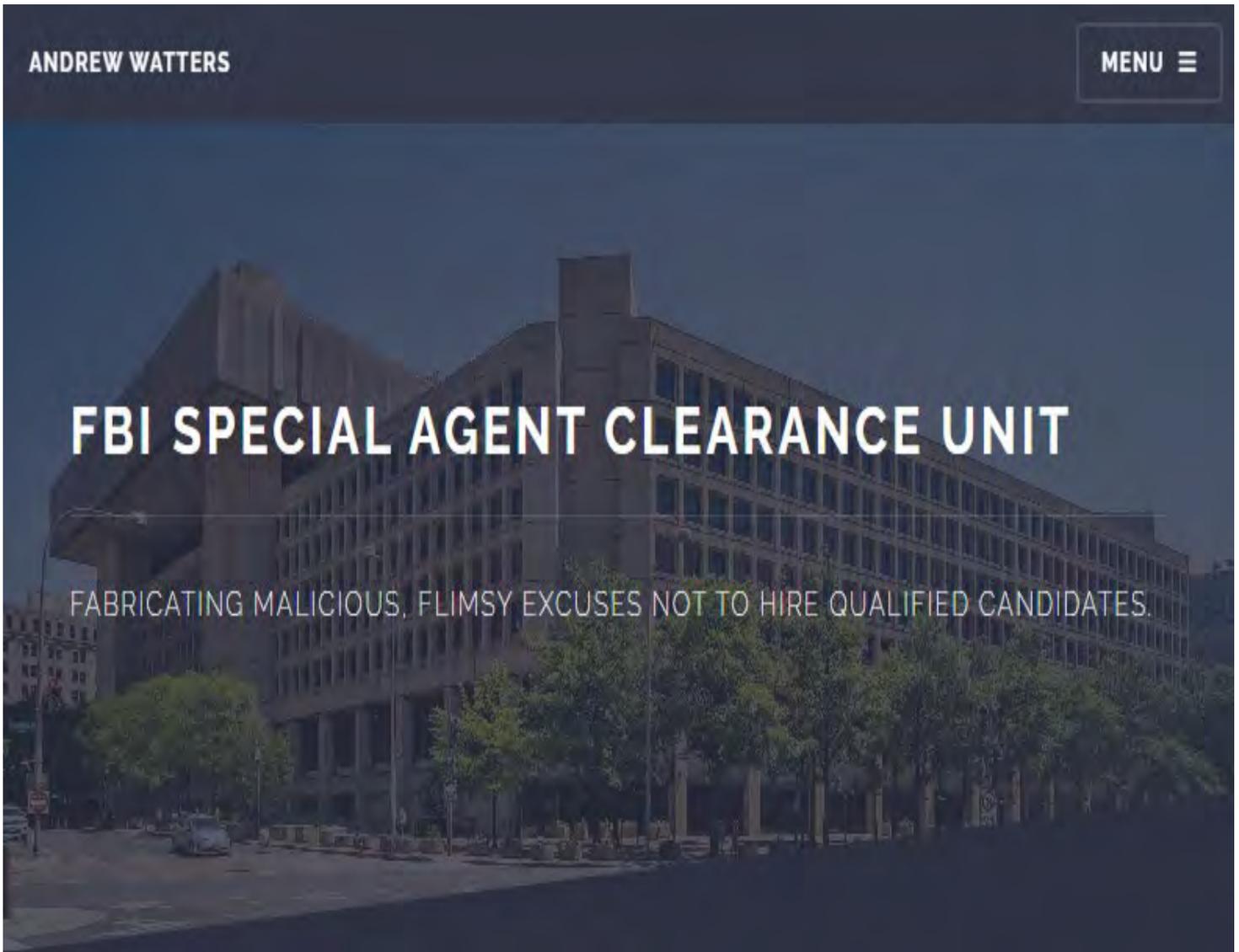
True and Correct Copy: Yes — authenticated in declaration.

Perma.cc Archival This exhibit has been permanently archived on Perma.cc to preserve its contents and ensure the integrity.
Perma.cc URL : <https://perma.cc/Y4EP-XCVC>

EXHIBIT 2-F

EXHIBIT 2-F

Screenshot of a badge-style statement published by Watters styled as “FBI Special Agent Clearance Unit,” submitted solely to demonstrate the intimidating context and implied investigative authority contributing to Plaintiff’s reasonable fear, and not as a basis for defamation, licensing, or any independent claim.



Building In Background Is **FBI Headquarters (J. Edgar Hoover Building)** in Washington, D.C.

** Highlighting (if any) added for the Court’s convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

Description: Screenshot of a badge-style statement published by Watters styled as “FBI Special Agent Clearance Unit,” submitted solely to demonstrate the intimidating context and implied investigative authority contributing to Plaintiff’s reasonable fear, and not as a basis for defamation, licensing, or any independent claim.

Source / URL: <https://www.andrewwatters.com/hall-of-shame/FBI-SACU/>

Captured by: Ligia Parmenter, Esq.

Date Captured: December 16, 2025 at 8:33 a.m. PST

True and Correct Copy: Yes — authenticated in declaration.

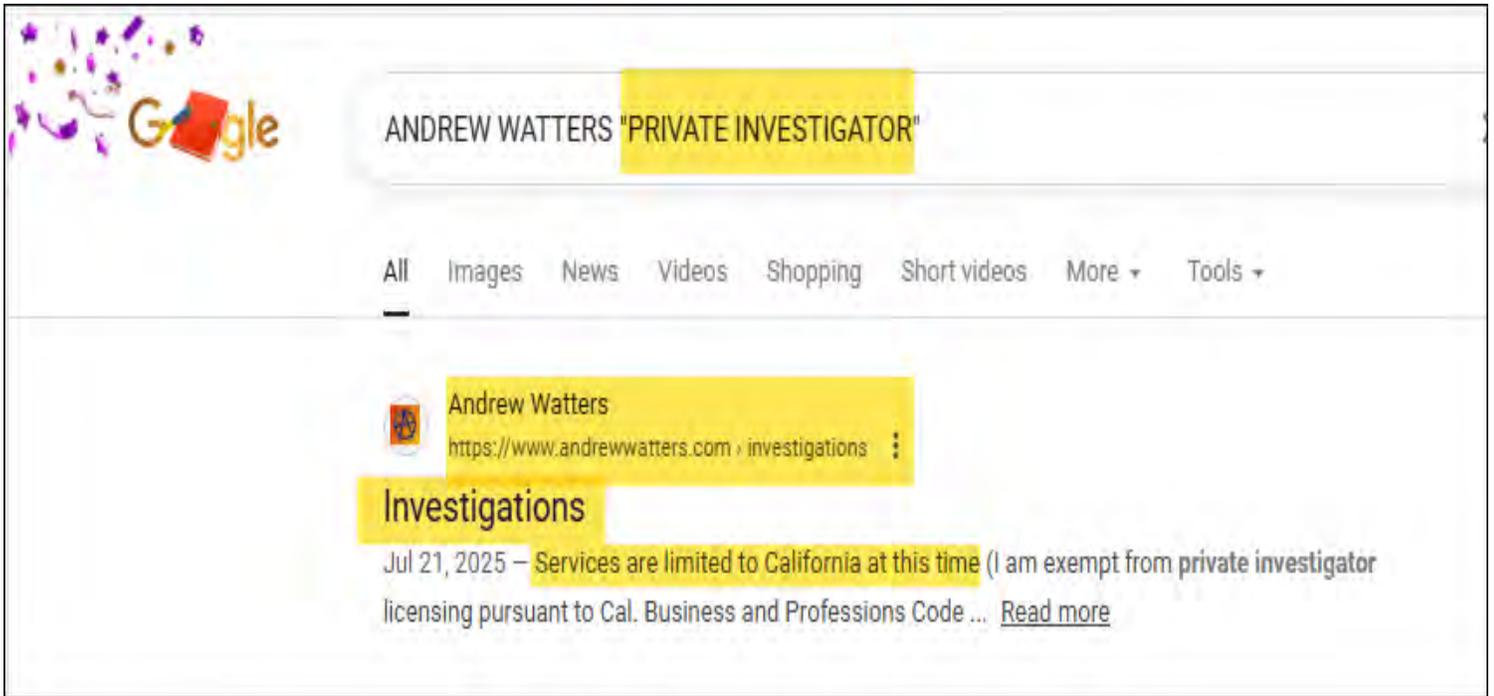
Perma.cc Archival This exhibit has been permanently archived on Perma.cc to preserve its contents and ensure the integrity.

Perma.cc URL : <https://perma.cc/Y4EP-XCVC>

EXHIBIT 2-G

EXHIBIT 2-G

Google search result snippets advertising Watters' "private investigations" services without private-investigator licensure, submitted solely to show misleading and unlawful advertising context contributing to intimidation, and not as an independent claim.



* Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.

Description:	Google search result snippets advertising Watters' "private investigations" services without private-investigator licensure, submitted solely to show misleading and unlawful advertising context contributing to intimidation, and not as an independent claim.
Source / URL:	ANDREW WATTERS "PRIVATE INVESTIGATOR" - Google Search please see below
Captured by:	Captured using Snagit (TechSmith) — Software v2024.1.2. by Ligia M. Parmenter
Date Captured:	January 1, 2026 at 8:13 a.m. PST
True and Correct Copy:	Yes — authenticated in declaration.

ANDREW WATTERS "PRIVATE INVESTIGATOR" - Google Search

https://www.google.com/search?q=ANDREW+WATTERS+%22PRIVATE+INVESTIGATOR%22&oq=ANDREW+WATTERS+%22PRIVATE+INVESTIGATOR%22&gs_lcrp=EgRlZGdlKgYIABBFgDkyBggAEEUYOTIKCAEQABiABBiiBDIKCAIQABiABBiiBDIKCAMQABiABBiiBDIHCAQQABjvBTIHCAUQABjvBdlBCTIyNDIyajBqMagCALACAA&sourceid=chrome&ie=UTF-8

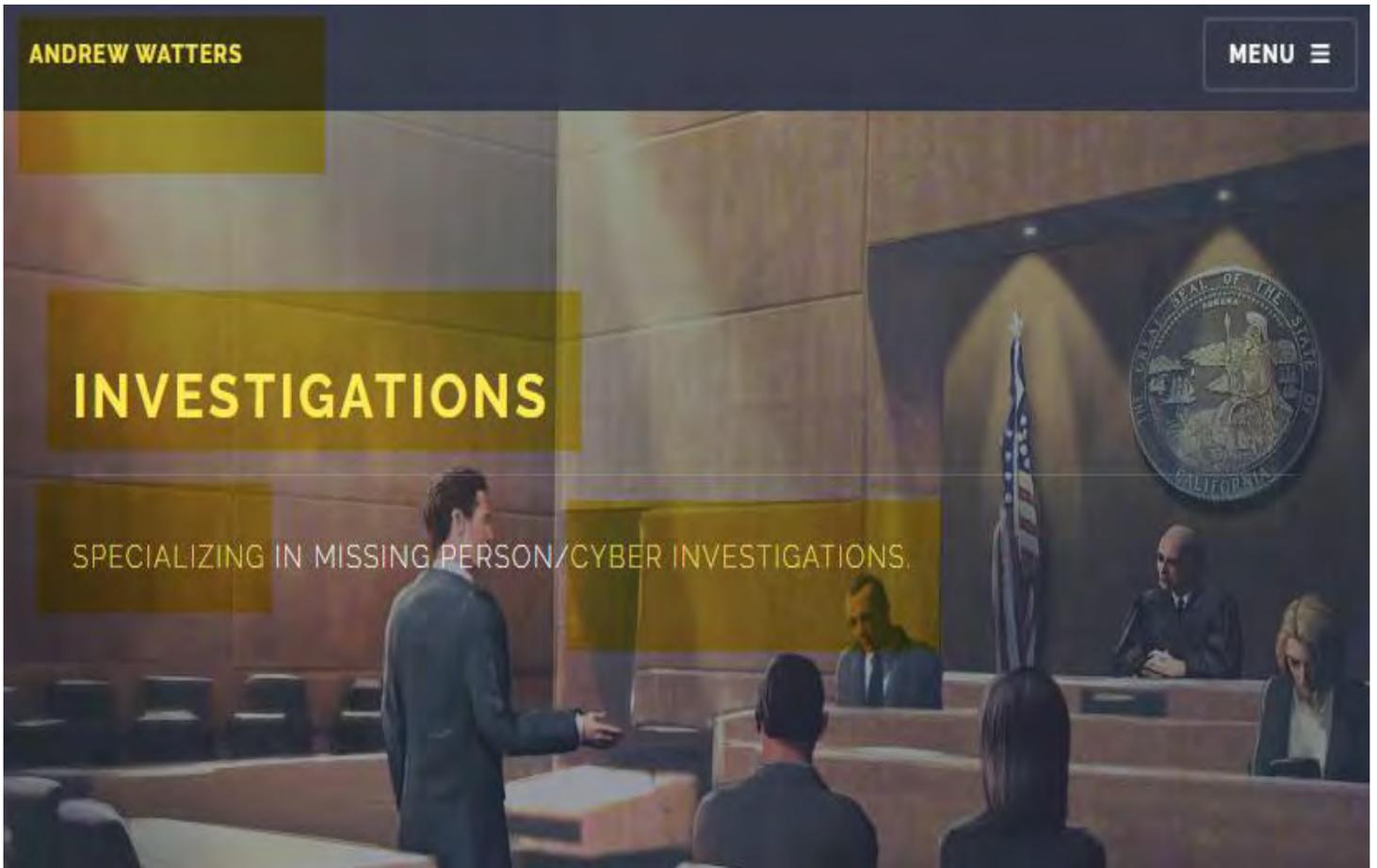
****NOTICE:** Search-engine snippet URLs are dynamically generated, non-static links that frequently change based on indexing, algorithm updates, geolocation, personalization, and search-engine rotation. If copied and pasted at a later time, these URLs will likely not open the same content or may fail to open at all. Accordingly, reliance should be made on the authenticated screenshot exhibits included herein as the accurate representation of the content as it appeared on the date and time of capture.

** Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

EXHIBIT 2-H

EXHIBIT 2-H

True and correct screenshot capture of Defendant Andrew Watters' webpage located at <https://www.andrewwatters.com/investigations/>, wherein he advertises himself as an “investigator specializing in cyber investigations” and falsely claims expertise and authority as a “private investigator” although he has no license under The *Bureau of Security and Investigative Services (BSIS)* — division of the California *Department of Consumer Affairs* — which issues licenses under the Private Investigator Act in the *Business and Professions Code*. Andrew Watters' “Investigator” webpage also implies affiliations with federal law-enforcement work.



* Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.

Description: True and correct screenshot capture of Defendant Andrew Watters' webpage located at <https://www.andrewwatters.com/investigations/>, wherein he advertises himself as an "investigator specializing in cyber investigations" and falsely claims expertise and authority as a "private investigator" although he has no license under The Bureau of Security and Investigative Services (BSIS) — division of the California Department of Consumer Affairs — which issues licenses under the Private Investigator Act in the Business and Professions Code. Andrew Watters' "Investigator" webpage also implies affiliations with federal law-enforcement work.

Source / URL: <https://www.andrewwatters.com/investigations/>

Captured by: Captured using Snagit (TechSmith) — Software v2024.1.2. by Ligia M. Parmenter

Date Captured: January 1, 2026 at 8:39 a.m. PST

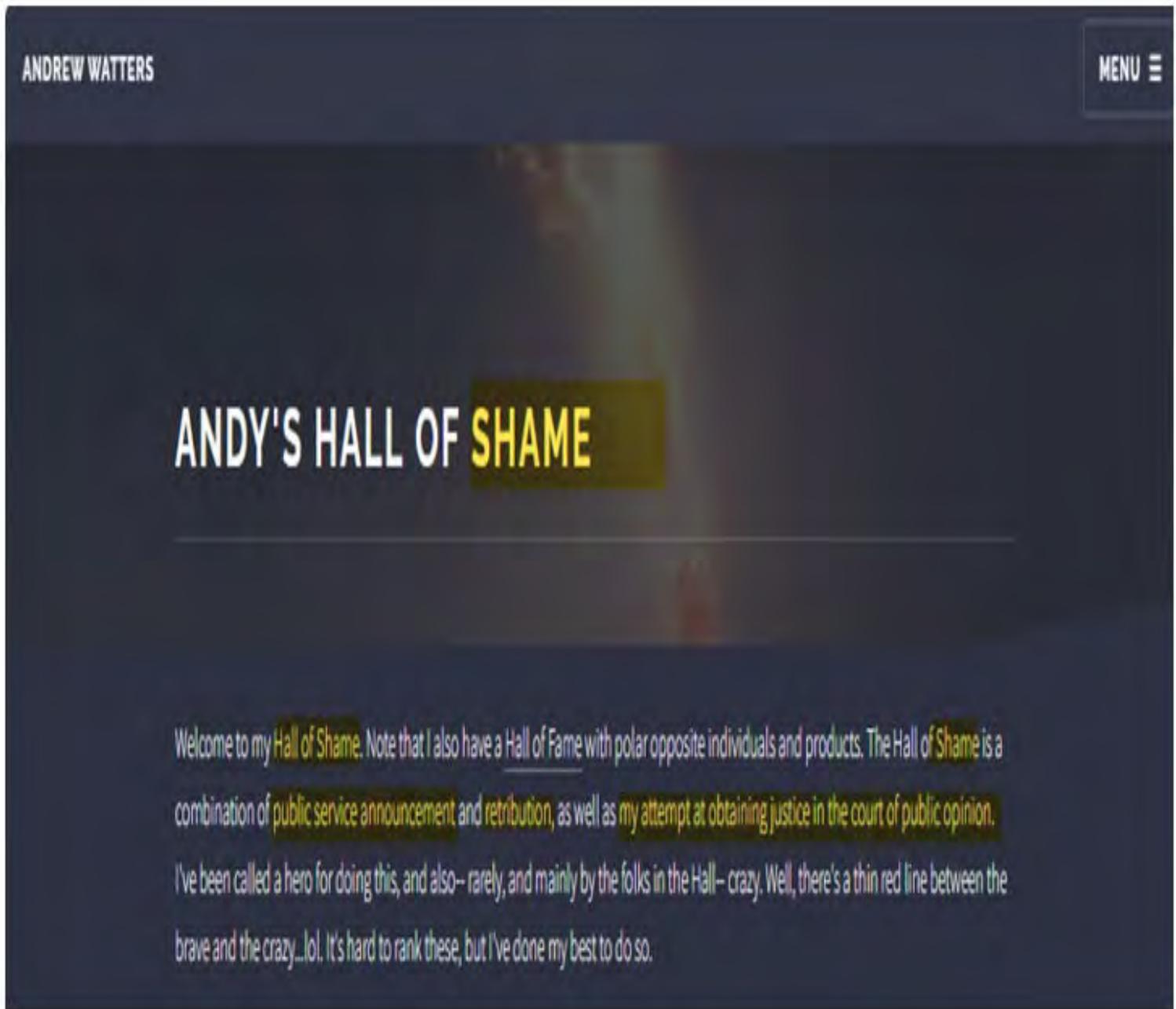
True and Correct Copy: Yes — authenticated in declaration.

Perma.cc Archival This exhibit has been permanently archived on Perma.cc to preserve its contents and ensure the integrity.
Perma.cc URL : <https://perma.cc/Y6FG-XLDU>

EXHIBIT 2-I

EXHIBIT 2-I

Watters' public statements admitting that his "Hall of Shame" is used as a tool of retribution and public targeting /shaming, including prioritizing and ranking individuals for exposure, contradicting his claim that it serves a public-service purpose.



* Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.

Description: Watters' public statements admitting that his "Hall of Shame" is used as a tool of retribution and public targeting /shaming, including prioritizing and ranking individuals for exposure, contradicting his claim that it serves a public-service purpose.

Source / URL: <https://www.andrewwatters.com/hall-of-shame/>

Captured by: Captured using Snagit (TechSmith) — Software v2024.1.2. by Ligia M. Parmenter

True and Correct Copy: Yes — authenticated in declaration.

Archival: **Archived Webpage Capture (Wayback Machine)**

Source: Internet Archive, Wayback Machine

Original URL: <https://www.andrewwatters.com/hall-of-shame/>

Archived URL:

<https://web.archive.org/web/20250224220617/https://www.andrewwatters.com/hall-of-shame/>

Date Archived: February 24, 2025

Date Accessed by Declarant: December 14, 2025 at 10:31 a.m. PST

Captured and preserved by Plaintiff using the Internet Archive Wayback Machine

EXHIBIT 3-A

EXHIBIT 3-A

Watters' "Personal Conduct" orders targeting attorneys he labels as mentally disabled, including references to mental illness and DSM-5 diagnoses, and threatening professional harm, cross-referenced to his September 19, 2023 extortionate threat letter (Exhibit 2-A), submitted solely to show intimidation, escalation, and Plaintiff's objectively reasonable fear of future harm, not as an independent claim or defamation basis.

Opposing Counsel Personal Conduct Policy

I have my opposing counsel personal conduct policy on my website in order to provide fair warning and also deter bad behavior. My policy is simple and well-known to my usual opposing counsel: I do not communicate by phone or in person with any attorney who (1) reneges on agreements, (2) spouts bullshit in any way, including the creation of false or misleading records, (3) acts shady or manipulative, (4) embarrasses me to my clients, (5) engages in harassment of any kind, or (6) exhibits two or more diagnostic criteria consistent with any known personality disorder, with particular focus on Cluster B personality disorders. This five-item policy is easy to administer and completely fair. Even if your phones are blocked, email may still be available in some scenarios, though I also reserve the right to block opposing counsel individual emails or even entire domains in the event of abuse of the privilege of email. Please be mindful of this policy when communicating with me, as there will be no advance notice or warning and an email block is seriously inconvenient, which is the point. Email is a privilege, not a right. I do not "diagnose" opposing counsel, nor would I presume to do that as a layman even though I frequently refer to the DSM-5 for guidance; I merely observe opposing counsel's actual behavior and proceed accordingly.

* Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.

Description: Watters' "Personal Conduct" orders targeting attorneys he labels as mentally disabled, including references to mental illness and DSM-5 diagnoses, and threatening professional harm, cross-referenced to his September 19, 2023 extortionate threat letter (Exhibit 2-A), submitted solely to show intimidation, escalation, and Plaintiff's objectively reasonable fear of future harm, not as an independent claim or defamation basis.

Source / URL: <https://www.andrewwatters.com>

Captured by: Captured using Snagit (TechSmith) — Software v2024.1.2. by Ligia M. Parmenter

True and Correct Copy: Yes — authenticated in declaration.

Archival: **Archived Webpage Capture (Wayback Machine)**
Source: Internet Archive, Wayback Machine
Original URL: <https://www.andrewwatters.com>
Archived URL: <https://web.archive.org/web/20240304011435/http://andrewwatters.com/law/>
Date Archived: March 4, 2024
Date Accessed by Declarant: December 13, 2025 at 9:37 a.m. PST
Captured and preserved by Plaintiff using the Internet Archive Wayback Machine

EXHIBIT 3-B

EXHIBIT 3-B

Exhibit 3-B— As a result of Defendant Andrew Watters’ sustained cyber-harassment and defamatory online publications, Plaintiff suffered documented psychiatric injuries causing significant emotional distress and functional impact. These injuries led to Plaintiff requiring, and the Superior Court of San Mateo granting, an ADA-based court accommodation to ensure equal access to the judicial process. The accommodation was granted as a direct consequence of the psychiatric harm inflicted by Defendant’s cyber-stalking and defamatory campaign, not due to any actual incapacity to practice law.

* Highlighting (if any) added for the Court’s convenience only; the underlying threat correspondence is a true and correct copy and has not been altered in substance.

RE: Urgent Disability Accommodation Request Parmenter v Watters, Case No. 25-CIV-01944

Yahoo/Inbox ☆



Jenarda Dubois

From: jdubois@sanmateocourt.org

To: Imparmenter@yahoo.com, ADA Coordinator



Wed, Nov 12 at 4:36 PM



Hello Ms. Parmenter,

Please disregard my previous email.

The judge overseeing your case has granted the continuance. You will be receiving an order indicating the new hearing date and time.

Cordially,

Jenarda Dubois



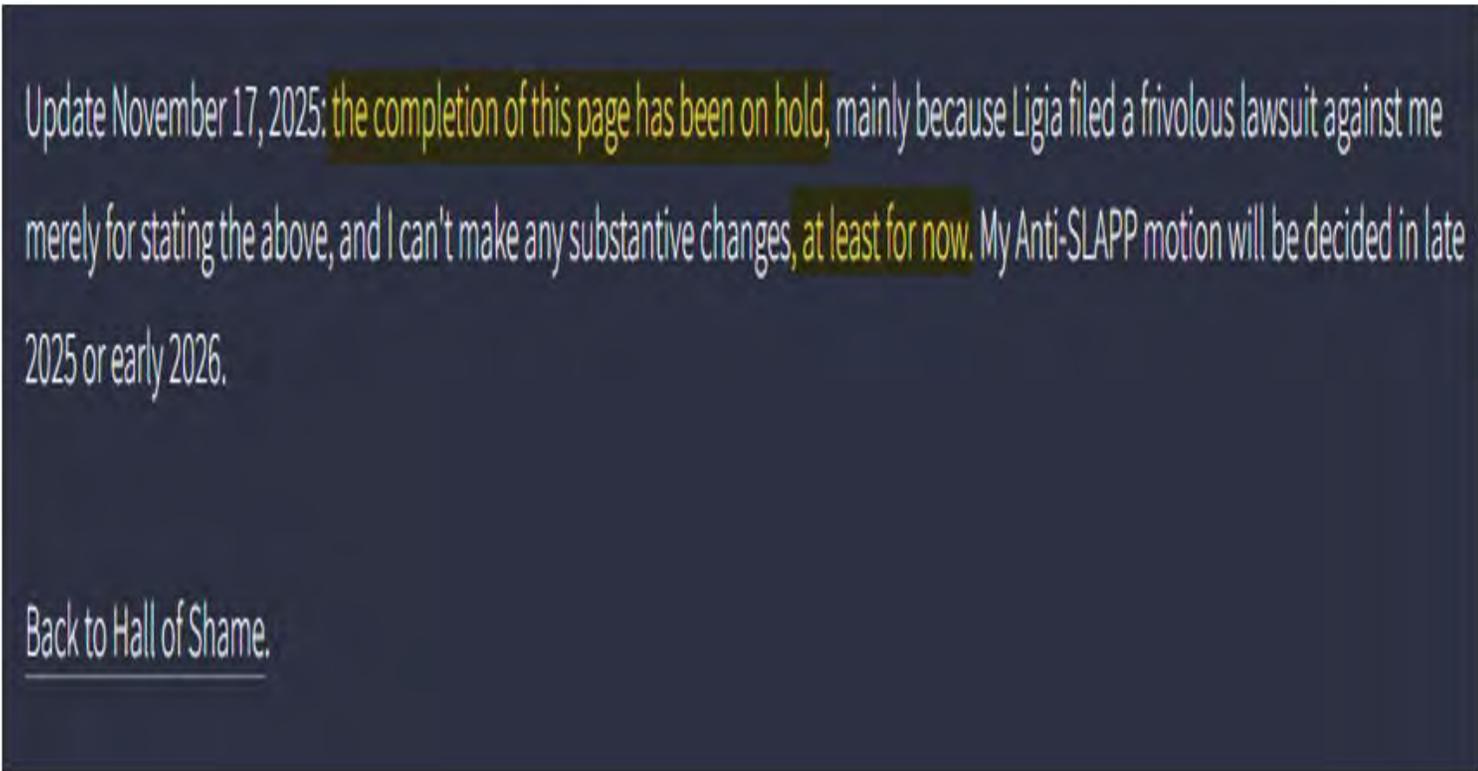
JENARDA DUBOIS (She/Her/Hers)
Human Resources Analyst/Civil Grand Jury Coordinator/ADA
Coordinator
Superior Court of California – County of San Mateo
(650) 261-5693

Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of intended recipient(s) and may contain confidential and protected information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the the original message.

EXHIBIT 3-C

EXHIBIT 3-C

November 17, 2025 website update by Watters threatening continued harm and cyber-harassment in retaliation for the Superior Court of San Mateo's grant of an ADA accommodation, submitted to document stalking, retaliation, and Plaintiff's reasonable fear of future intimidation and harm.



Update November 17, 2025: the completion of this page has been on hold, mainly because Ligia filed a frivolous lawsuit against me merely for stating the above, and I can't make any substantive changes, at least for now. My Anti-SLAPP motion will be decided in late 2025 or early 2026.

[Back to Hall of Shame.](#)

EVIDENTIARY PURPOSE AND ANTI-PRIVILEGE CLARIFICATION NOTICE

This exhibit is submitted **exclusively to document Plaintiff's reasonable fear of Defendant Andrew Watters' threatened future conduct and intimidation**, and **not** as the basis for any claim arising from this specific "litigation update" language. Defendant Andrew Watters' recent update on November 17, 2025 with the addition of the phrase "*frivolous lawsuit*" and his reference to an "*Anti-SLAPP motion to be decided in late 2025 or early 2026*" appears to be a calculated attempt to **mislead the Court and the public into perceiving his defamatory webpage as litigation-privileged speech** – when it is NOT – this November 17, 2025 statement was only days after Plaintiff received an accommodation from the Superior Court of San Mateo pursuant to the ADA and as a result of the injuries Andrew Watters has inflicted on Plaintiff.

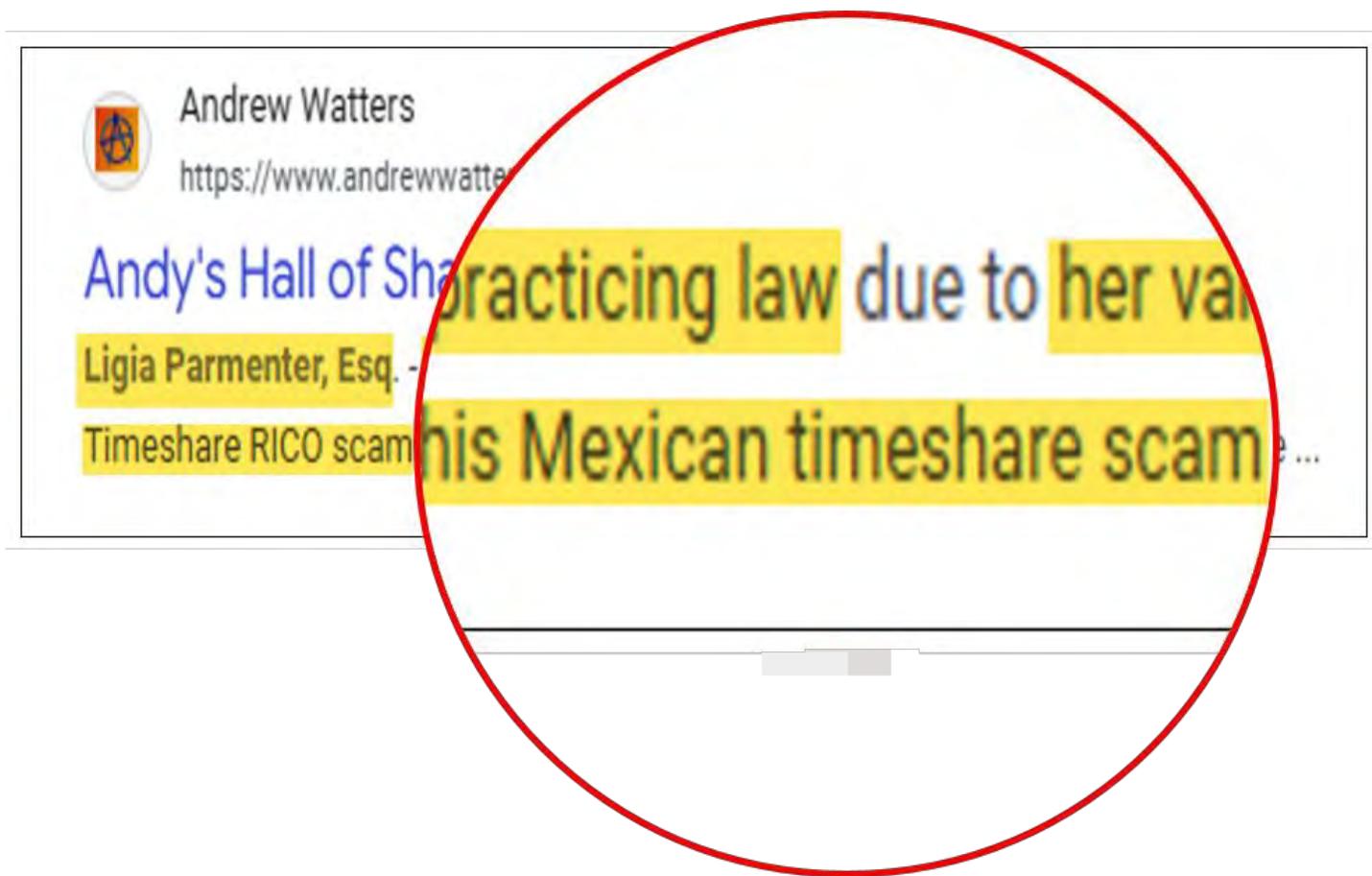
* *Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

Description:	November 17, 2025 website update by Watters threatening continued harm and cyber-harassment in retaliation for the Superior Court of San Mateo's grant of an ADA accommodation, submitted to document stalking, retaliation, and Plaintiff's reasonable fear of future intimidation and harm.
Source / URL:	https://www.andrewwatters.com/hall-of-shame/ligia-parmenter/
Captured by:	Captured using Snagit (TechSmith) — Software v2024.1.2. by Ligia M. Parmenter
Date Captured:	November 30, 2025 at 12:24 p.m. PST
True and Correct Copy:	Yes — authenticated in declaration.
Perma.cc Archival	This exhibit has been permanently archived on Perma.cc to preserve its contents and ensure the integrity. Perma.cc URL : https://perma.cc/KKV2-MRFF

EXHIBIT 3-D

EXHIBIT 3-D

False statements by Defendant Andrew Watters alleging a “Mexico RICO timeshare scam,” offered to demonstrate racially targeted defamatory conduct directed at Plaintiff as a Latina attorney.



Portion of image magnified and highlighted with a red circle for clarity; red circle is not part of the original capture.

** Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

Description:	False statements by Defendant Andrew Watters alleging a “Mexico RICO timeshare scam,” offered to demonstrate racially targeted defamatory conduct directed at Plaintiff as a Latina attorney.
Source / URL:	"LIGIA PARMENTER, ESQ" - Google Search - please see below
Captured by:	Captured using Snagit (TechSmith) — Software v2024.1.2. by Ligia M. Parmenter
Date Captured:	November 29, 2025 at 12:13 p.m. PST
True and Correct Copy:	Yes — authenticated in declaration.

"LIGIA PARMENTER, ESQ" - Google Search

https://www.google.com/search?q=%22LIGIA+PARMENTER%2C+ESQ%22&oq=%22ligia+&gs_lcrp=EgRI ZGdlKgYIAhBFGDsyCQgAEEUYOxj5BzIGCAEQRRg5MgYIAhBFGDsyBwgDEAAYgAQyBwgEEAAYg AQyBwgFEAAYgAQyBggGEEUYPDIGCAcQRRg8MgYICBBFGDzSAQg2NDQwajBqNKgCALACAQ&sourceid=chrome&ie=UTF-8

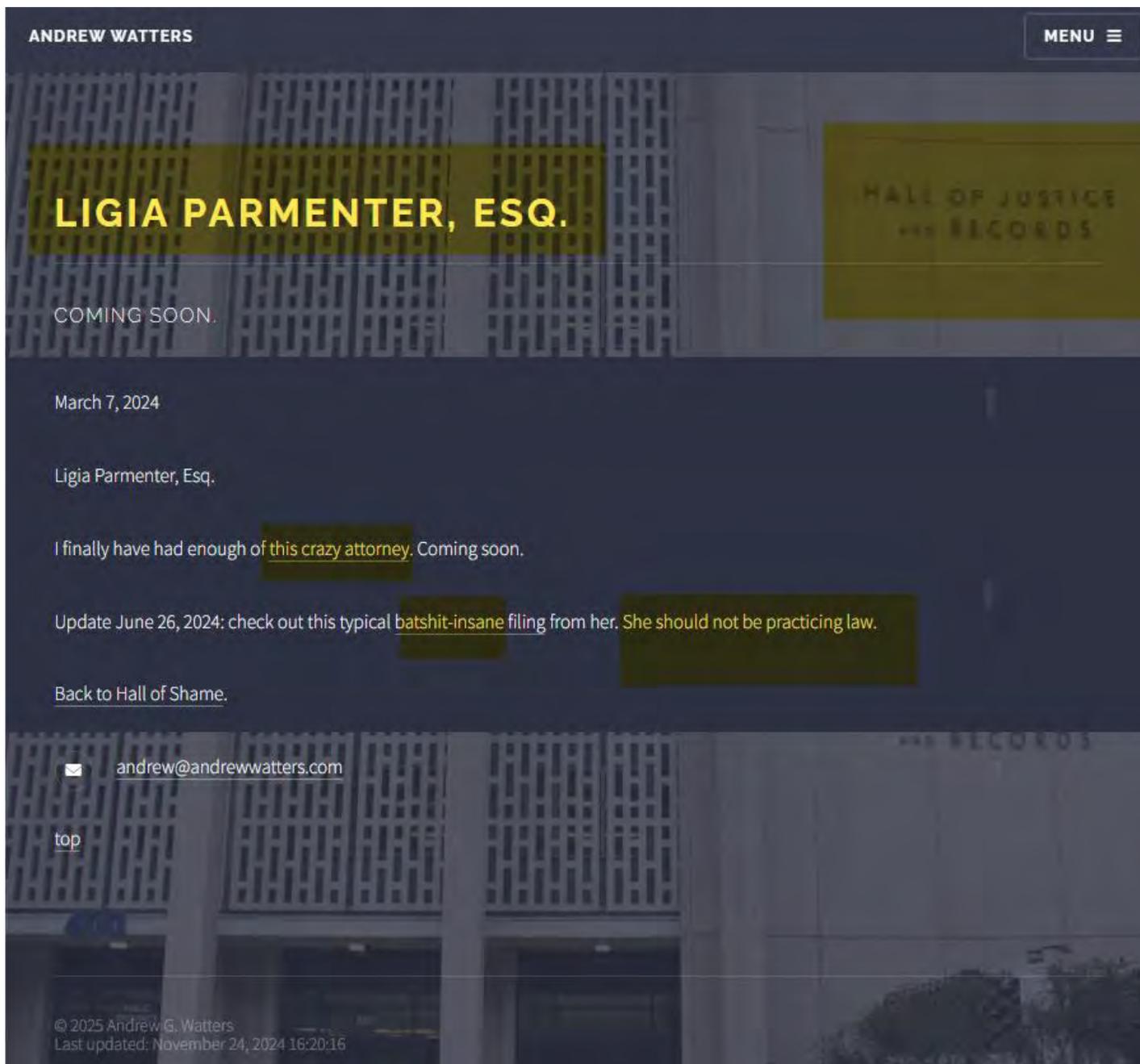
****NOTICE:** Search-engine snippet URLs (Google, Bing, Yahoo, DuckDuckGo, etc.) are dynamically generated, non-static links that frequently change based on indexing, algorithm updates, geolocation, personalization, and search-engine rotation. If copied and pasted at a later time, these URLs will likely not open the same content or may fail to open at all. Accordingly, reliance should be made on the authenticated screenshot exhibits included herein as the accurate representation of the content as it appeared on the date and time of capture.

** Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

EXHIBIT 4-A

EXHIBIT 4-A

Screenshot of Watters' "Hall of Shame" webpage displaying Plaintiff's name prominently as the headline on his law-office website, evidencing intentional public targeting through continuous online publication.



* Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.

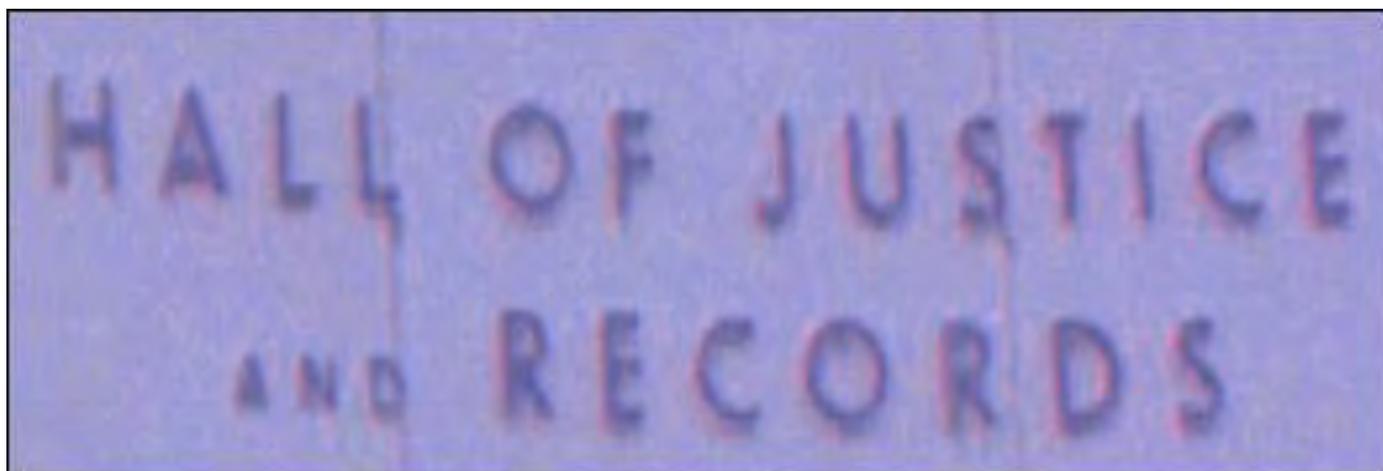
Description:	Screenshot of Watters' "Hall of Shame" webpage displaying Plaintiff's name prominently as the headline on his law-office website, evidencing intentional public targeting through continuous online publication.
Source / URL:	https://www.andrewwatters.com/hall-of-shame/ligia-parmenter/
Captured by:	Captured using Snagit (TechSmith) — Software v2024.1.2. by Ligia M. Parmenter
Date Captured:	Captured October 15, 2025 1:36 pm PST
True and Correct Copy:	Yes — authenticated in declaration.
Perma.cc Archival	This exhibit has been permanently archived on Perma.cc to preserve its contents and ensure the integrity. Perma.cc URL : https://perma.cc/7Y8V-TXBZ

** Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

EXHIBIT 4-B

EXHIBIT 4-B

Screenshot showing Watters' use of a "Hall of Justice and Records" emblem adjacent to **false** defamatory statements about Plaintiff, misrepresenting them as court-sanctioned findings.



** Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

Description:	Screenshot showing Watters' use of a "Hall of Justice and Records" emblem adjacent to false defamatory statements about Plaintiff, misrepresenting them as court-sanctioned findings.
Source / URL:	https://www.andrewwatters.com/hall-of-shame/ligia-parmenter/
Captured by:	Captured using Snagit (TechSmith) — Software v2024.1.2. by Ligia M. Parmenter
Date Captured:	Captured October 15, 2025 1:36 pm PST
True and Correct Copy:	Yes — authenticated in declaration.
Perma.cc Archival	This exhibit has been permanently archived on Perma.cc to preserve its contents and ensure the integrity. Perma.cc URL : https://perma.cc/7Y8V-TXBZ

** Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

EXHIBIT 4-C

EXHIBIT 4-C

False and defamatory per se statements deliberately placed together by Watters on his "Hall of Shame" to generate false statements of fact across Google, Bing, Yahoo, DuckDuckGo, and ChatGPT search results portraying Plaintiff as a criminal **RICO** Racketeer Influenced and Corrupt Organizations Act in "Mexico" and a time share scammer.

8. Ligia Parmenter, Esq. - should not be practicing law due to her various issues.

9. Timeshare RICO scam - I uncovered this Mexican timeshare scam where they

Description: False and defamatory per se statements deliberately placed together by Watters on his “Hall of Shame” to generate false statements of fact across Google, Bing, Yahoo, DuckDuckGo, and ChatGPT search results portraying Plaintiff as a criminal **RICO** Racketeer Influenced and Corrupt Organizations Act **in** “Mexico” and a time share scammer.

Source / URL: <https://www.andrewwatters.com/hall-of-shame/>

Captured by: Captured using Snagit (TechSmith) — Software v2024.1.2. by Ligia M. Parmenter

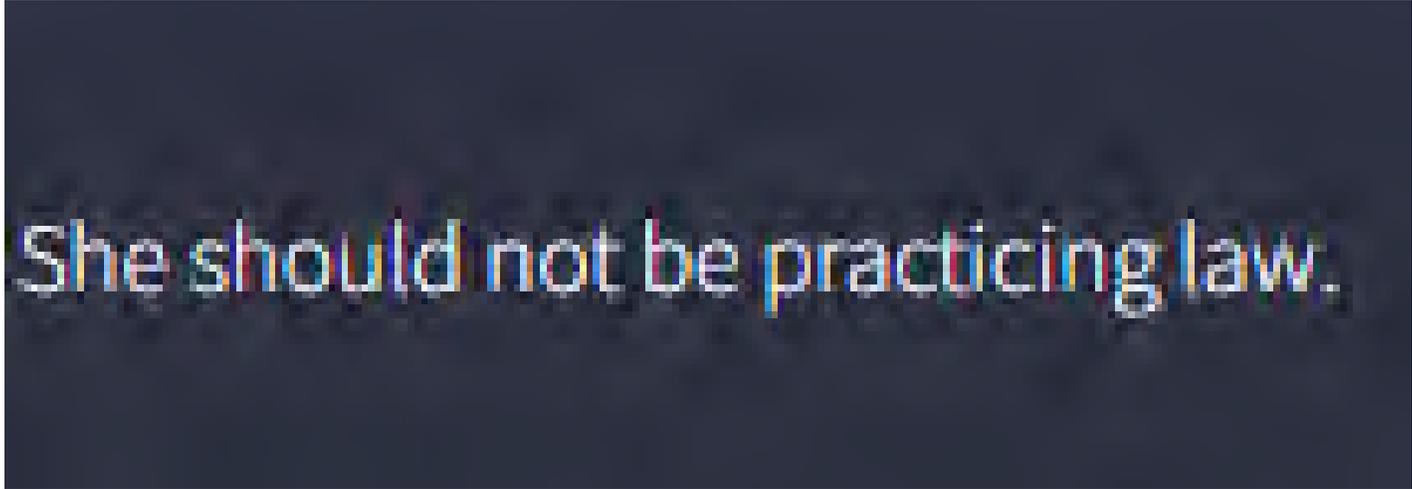
True and Correct Copy: Yes — authenticated in declaration.

Archival: **Archived Webpage Capture (Wayback Machine)**
Source: Internet Archive, Wayback Machine
Original URL: <https://www.andrewwatters.com/hall-of-shame/>
Archived URL:
<https://web.archive.org/web/20250224220617/https://www.andrewwatters.com/hall-of-shame/>
Date Archived: February 24, 2025
Date Accessed by Declarant: December 14, 2025 at 10:31 a.m. PST
Captured and preserved by Plaintiff using the Internet Archive Wayback Machine

EXHIBIT 4-D

EXHIBIT 4-D

False and defamatory per se statement published by Watters asserting that Plaintiff “should not be practicing law” and is engaged in unlawful practice of law, used to dominate search-engine snippets.



She should not be practicing law.

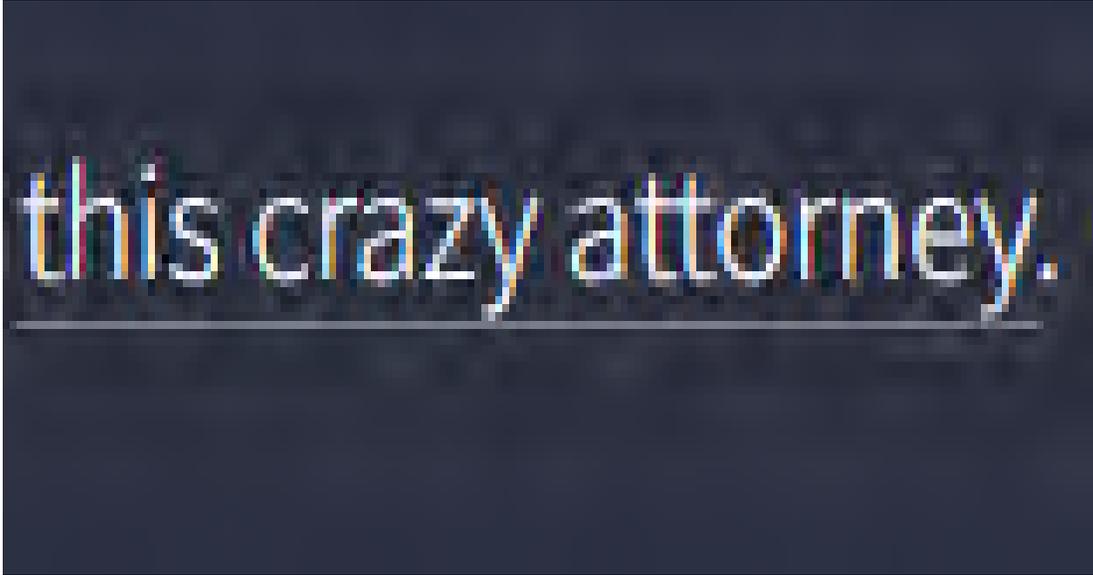
** Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

Description:	False and defamatory per se statement published by Watters asserting that Plaintiff “should not be practicing law” and is engaged in unlawful practice of law, used to dominate search-engine snippets.
Source / URL:	https://www.andrewwatters.com/hall-of-shame/ligia-parmenter/
Captured by:	Captured using Snagit (TechSmith) — Software v2024.1.2. by Ligia M. Parmenter
Date Captured:	Captured October 15, 2025 1:36 pm PST
True and Correct Copy:	Yes — authenticated in declaration.
Perma.cc Archival	This exhibit has been permanently archived on Perma.cc to preserve its contents and ensure the integrity. Perma.cc URL : https://perma.cc/7Y8V-TXBZ

EXHIBIT 4-E

EXHIBIT 4-E

False and defamatory per se statement published by Watters asserting that Plaintiff is mentally deficient and mentally unstable, used to dominate search-engine snippets.



Underlining is a link used by Andrew Watters to dox "Ligia Parmenter, Esq." and links to Plaintiff's law office web page.

** Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

Description: False and defamatory per se statement published by Watters asserting that Plaintiff is mentally deficient and mentally unstable, used to dominate search-engine snippets.

Source / URL: <https://www.andrewwatters.com/hall-of-shame/ligia-parmenter/>

Captured by: Captured using Snagit (TechSmith) — Software v2024.1.2. by Ligia M. Parmenter

Date Captured: Captured October 15, 2025 1:36 pm PST

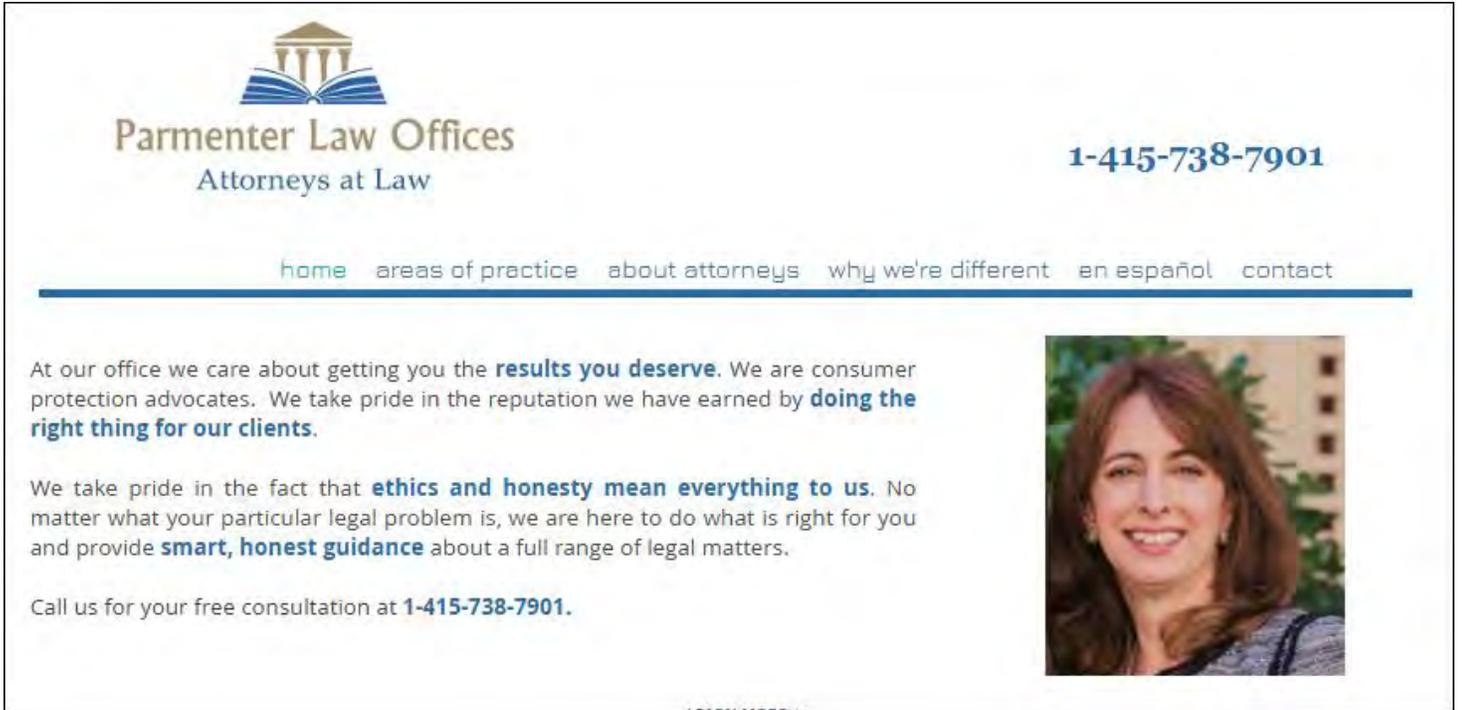
True and Correct Copy: Yes — authenticated in declaration.

Perma.cc Archival This exhibit has been permanently archived on Perma.cc to preserve its contents and ensure the integrity.
Perma.cc URL : <https://perma.cc/7Y8V-TXBZ>

EXHIBIT 4-E-1

EXHIBIT 4-E-1

Screenshot showing Watters' photo-doxing of Plaintiff on his "Hall of Shame" webpage, including underlined text and a hyperlink directing to Plaintiff's law-office webpage with her photograph.



The screenshot displays the Parmenter Law Offices website. At the top left is the logo, which consists of a stylized building with columns above an open book. Below the logo, the text reads "Parmenter Law Offices" in a large, bold, serif font, and "Attorneys at Law" in a smaller, sans-serif font below it. To the right of the logo, the phone number "1-415-738-7901" is displayed in a blue, sans-serif font. Below the logo and phone number is a horizontal navigation bar with a blue underline. The navigation bar contains the following links: "home", "areas of practice", "about attorneys", "why we're different", "en español", and "contact". Below the navigation bar, there is a main content area. On the left side of this area, there are three paragraphs of text. The first paragraph reads: "At our office we care about getting you the **results you deserve**. We are consumer protection advocates. We take pride in the reputation we have earned by **doing the right thing for our clients**." The second paragraph reads: "We take pride in the fact that **ethics and honesty mean everything to us**. No matter what your particular legal problem is, we are here to do what is right for you and provide **smart, honest guidance** about a full range of legal matters." The third paragraph reads: "Call us for your free consultation at **1-415-738-7901**." On the right side of the main content area, there is a portrait photograph of a woman with long, dark hair, smiling. The photograph is a square format and shows the woman from the chest up. The background of the photograph is slightly blurred, showing what appears to be an outdoor setting with a building.

* Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.

Description:	Screenshot showing Watters' photo-doxing of Plaintiff on his "Hall of Shame" webpage, including underlined text and a hyperlink directing to Plaintiff's law-office webpage with her photograph.
Source / URL:	https://lawpar.wixsite.com/parmenterlaw
Captured by:	Captured using Snagit (TechSmith) — Software v2024.1.2. by Ligia M. Parmenter
Date Captured:	January 1, 2026 at 1:21 p.m. PST
True and Correct Copy:	Yes — authenticated in declaration.
Perma.cc Archival	This exhibit has been permanently archived on Perma.cc to preserve its contents and ensure the integrity. Perma.cc URL : https://perma.cc/6CBS-LKU3

EXHIBIT 4-F

EXHIBIT 4-F

False and defamatory per se statement published by Watters asserting that Plaintiff is unlawfully practicing law and is mentally deficient and mentally unstable, used to dominate search-engine snippets.



batshit-insane filing from her. She should not be practicing law.

** Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

Description: False and defamatory per se statement published by Watters asserting that Plaintiff is unlawfully practicing law and is mentally deficient and mentally unstable, used to dominate search-engine snippets.

Source / URL: <https://www.andrewwatters.com/hall-of-shame/ligia-parmenter/>

Captured by: Captured using Snagit (TechSmith) — Software v2024.1.2. by Ligia M. Parmenter

Date Captured: Captured October 15, 2025 1:36 pm PST

True and Correct Copy: Yes — authenticated in declaration.

Perma.cc Archival This exhibit has been permanently archived on Perma.cc to preserve its contents and ensure the integrity.
Perma.cc URL : <https://perma.cc/7Y8V-TXBZ>

EXHIBIT 4-G

EXHIBIT 4-G

Evidence showing Watters publishing false and harassing statements about Plaintiff on the secondary website "JD Underground" (www.slash.law), including claims that Plaintiff is mentally unstable and unlawfully practicing law.



Recently active users: [2tierreality](#) [Andy](#) [Blee](#) [doublefriedchicken](#) [Feic](#) [marlon](#) [Trit](#)

[/top](#) [/all](#) [/jobs](#)

Read Post

Wed, 26 Jun 2024 08:29:06 -0700

[Andy](#) from private IP

/all

Check out [this nutcase attorney](#)

This is some Twilight Zone shit. See what I have to put up with in this case?

<https://www.andrewwatters.com/hall-of-shame/ligia-parmenter/Parmenter-sample-filing.pdf>

[#Alcohol](#) [#DrugFree](#) [#LawFirm](#)

Sat, 29 Jun 2024 02:22:57 -0700

[whiteguyinchina](#) from private IP

/all

Is this lawyer zhang again?

Sun, 30 Jun 2024 06:19:41 -0700

[Andy](#) from private IP

/all

This is Ligia Parmenter, who is even more insane than Zheng Liu. I didn't think that was possible!

* Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.

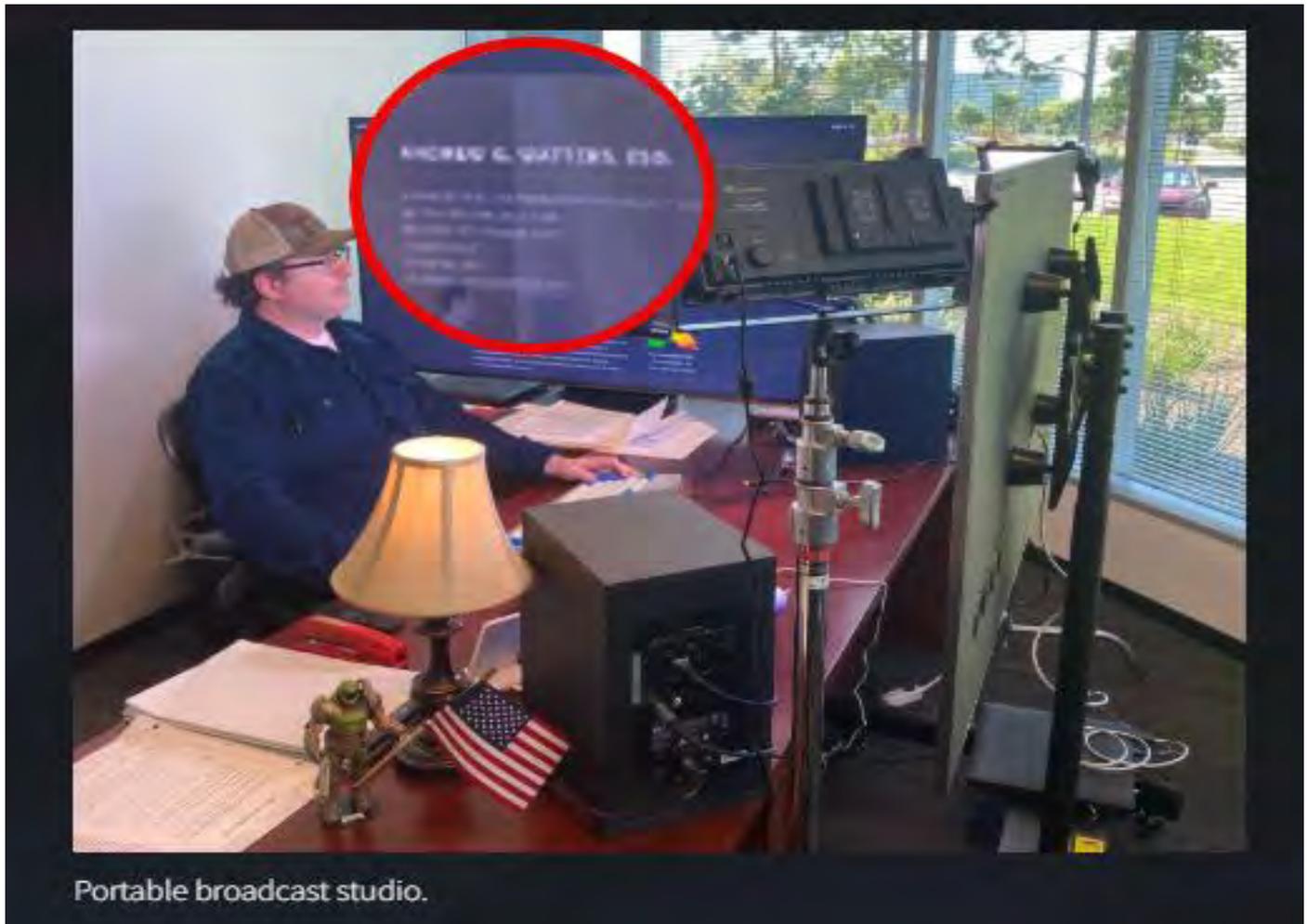
Description:	Evidence showing Watters publishing false and harassing statements about Plaintiff on the secondary website “JD Underground” (www.slash.law), including claims that Plaintiff is mentally unstable and unlawfully practicing law.
Source / URL:	https://slash.law/jdu/read.php?post=../posts/all/1719415746-112.txt
Captured by:	Captured using Snagit (TechSmith) — Software v2024.1.2. by Ligia M. Parmenter
Date Captured:	December 13, 2025 at 4:31 p.m. PST
True and Correct Copy:	Yes — authenticated in declaration.
Perma.cc Archival	This exhibit has been permanently archived on Perma.cc to preserve its contents and ensure the integrity. Perma.cc URL : https://perma.cc/F4H4-K5UW

** Highlighting (if any) added for the Court’s convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

EXHIBIT 5-A

EXHIBIT 5-A

Photograph depicting Defendant Andrew Watters working from a multi-monitor computer workstation and integrated server infrastructure at this law office – as per the screen Andrew Watters is working on www.andrewwatters.com. This exhibit is offered to demonstrate Defendant Andrew Watters direct operational control over his commercial website www.andrewwatters.com (www.andrewwatters.com/hall-of-shame/), and the publication systems used to create, manage, and disseminate the defamatory and harassing online content alleged in this action.



This image has been magnified for visibility. The only alteration made is enlargement. No content has been added, removed, or modified.

** Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

Description: Photograph depicting Defendant Andrew Watters working from a multi-monitor computer workstation and integrated server infrastructure at this law office – as per the screen Andrew Watters is working on www.andrewwatters.com. This exhibit is offered to demonstrate Defendant Andrew Watters direct operational control over his commercial website www.andrewwatters.com (www.andrewwatters.com/hall-of-shame/), and the publication systems used to create, manage, and disseminate the defamatory and harassing online content alleged in this action.

Source / URL: <https://web.archive.org/web/20241106024254/https://www.raellic.com/#AIS>

Captured by: Captured using Snagit (TechSmith) — Software v2024.1.2. by Ligia M. Parmenter

True and Correct Copy: Yes — authenticated in declaration.

Archival: **Archived Webpage Capture (Wayback Machine)**
Source: Internet Archive, Wayback Machine
Original URL: www.raellic.com
Archived URL:
<https://web.archive.org/web/20241106024254/https://www.raellic.com/#AIS>

Date Archived: November 6, 2024

Date Accessed by Declarant: December 28, 2025 at 1:13 p.m. PST
Captured and preserved using the Internet Archive Wayback Machine

EXHIBIT 5-B

EXHIBIT 5-B

Search-engine results for “Andrew Watters attorney” showing Defendant’s “Hall of Shame” webpage as the primary result, demonstrating its role as the commercial centerpiece of his law-office marketing website.

The screenshot shows a Google search for "andrew watters attorney". The search bar is highlighted in yellow. Below the search bar, navigation tabs for "All", "Images", "News", "Videos", "Shopping", "Short videos", "More", and "Tools" are visible. The search results are as follows:

- Andrew Watters** (https://www.andrewwatters.com) - Profile card with a yellow highlight.
- Andrew Watters** - Main search result with a yellow highlight. Description: "I am a radically honest, category-defying polymath based in Redwood City, California, USA. I am primarily a lawyer, with a law degree from UC College of Law ..."
- Andy's Hall of Shame** - Result with a yellow highlight. Description: "The Hall of Shame is a combination of public service ..."
- Recommended Attorneys** - Result with a yellow highlight. Description: "Andrew Watters. Menu. Recommended Attorneys. If ..."
- Andy's Hall of Fame** - Result with a yellow highlight. Description: "Kai Scissors - The greatest professional scissors on Earth ..."
- Marrying my dream girl** - Result with a yellow highlight. Description: "We are planning an immediate family-only 'micro ceremony' in ..."
- The Honorable Chinhayi Cadet** - Result with a yellow highlight. Description: "This has recently happened in several other cases with other ..."

On the right side of the search results, there is a business listing for **Andrew G. Watters, Esq.** with a yellow highlight. The listing includes:

- 4.0 stars (4 Google reviews)
- Attorney in Redwood City, California
- Buttons for Website, Directions, Reviews, Save, Share, and Call.
- Address: 555 Twin Dolphin Dr Ste 135, Redwood City, CA 94065 (highlighted in yellow)
- Get There: 2 hr 52 min (walking), 1 hr 10 min (driving)
- Phone: (415) 261-8527

* Highlighting (if any) added for the Court’s convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.

Description: Search-engine results for “Andrew Watters attorney” showing Defendant’s “Hall of Shame” webpage as the primary result, demonstrating its role as the commercial centerpiece of his law-office marketing website.

Source / URL: *See Below*

Captured by: Captured using Snagit (TechSmith) — Software v2024.1.2. by Ligia M. Parmenter

Date Captured: December 15, 2025 at 9:29 p.m. PST

True and Correct Copy: Yes — authenticated in declaration.

The above image is a true and correct screenshot captured by Plaintiff using Snagit (TechSmith Snagit, v. 2025) on December 15, 2025 at 9:29 p.m. PST. The screenshot accurately reflects the content as it appeared on the Google search at the ULR below.

https://www.google.com/search?q=andrew+watters+attorney&sca_esv=8efe466fbfa838b2&ei=6etAadLkKN6EwbkP7_eaoA8&ved=2ahUKEwiS_fj9rcGRAXVeQjABHe-7BvQQ4dUDegQIBRAN&uact=5&oq=andrew+watters+attorney&gs_lp=Egxn3Mtd2l6LXNlcnAiF2FuZHJldyB3YXR0ZXJzIGF0dG9ybmV5MgsQLhiABBjHARivATIGEAAyFhgeMgUQABjvBTIIEAAyYgAQYogQyCBAAGIAEGKIEMggQABiABBiiBDIaEC4YgAQYxwEYrweYlUUY3AQY3gQY4ATYAQFIhk9QyQpY1ElwAngBkAEEmAGkAaABiRyqAQQwLjI5uAEDyAEA-AEBmAIaoAKnGKgCCsICChAAGLADGNYEGEfCAgUQABiABMICBRAuGIAEwgILEAAyYgAQYkQIYigXCAh0QLhiABBiRAhi0AhjnBhjHARiKBRjqAhivAdgBASiCFxAAGIAEGJECGLQCgOoCGGIoFGOoC2AECwgIXEC4YgAQYkQIYtAIY5wYYigUY6gLYAQLCAhAQABgDGLQCGOoCGI8B2AECwgIKEC4YgAQYQxiKbCICCAuGIAEGJECGIoFwgIWEC4YgAQYsQMY0QMYQxiDARjHARiKbCICCAuGIAEGLEDGIMBwgIOEC4YgAQYsQMYgwEYigXCAg4QABiABBixAxiDARiKbCICCAuGIAEGEMyigXCAhkQLhiABBhDGloFGJcFGNwEGN4EGOAE2AEBwgIQEC4YgAQYQxjHARiKBRivAcICEBAuGIAEGLEDGEMygwEYigXCAg0QLhiABBixAxiDGloFwgIfEC4YgAQYQxjHARiKBRivARiXBRjcBBjeBBjgBNgBAcICCAuGIAEGLEDGIMBwgIIEC4YgAQYsQPCAg4QLhiABBiRAhixAxiKbCICDhAuGIAEGMcBGI4FGK8BwgIIEAAyYgAQYsQOYAwXxBU7AsSinQ-N2iAYBkAYGugYGCAEQARgUugYECAIYB5IHBDluMjSgB7W9BrIHBDuMjS4B58YwgcGMC43LjE5yAdkgAgA&scient=gws-wiz-serp

****NOTICE:** Search-engine snippet URLs (Google, Bing, Yahoo, DuckDuckGo, etc.) are dynamically generated, non-static links that frequently change based on indexing, algorithm updates, geolocation, personalization, and search-engine rotation. If copied and pasted at a later time, these URLs will likely not open the same content or may fail to open at all. Accordingly, reliance should be made on the authenticated screenshot exhibits included herein as the accurate representation of the content as it appeared on the date and time of capture.

** Highlighting (if any) added for the Court’s convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

EXHIBIT 5-C

EXHIBIT 5-C

Bing search results for “Andrew Watters attorney” showing his “Hall of Shame” webpage as the primary result, demonstrating its role as the cornerstone of his law-office marketing website.

Andrew G. Watters, Esq.
www.andrewwatters.com

Lawyer in Redwood City, CA

555 Twin Dolphin Dr, Redwood City, CA 94065 · 34 mi

Closed · Opens tomorrow 9 AM · More hours ▾

(415) 261-8527

Website

Directions

andrewwatters.com
https://www.andrewwatters.com

Andrew Watters
Attorney - general civil litigation and complex family law, with twenty years of experience and 40+ trials. Also available for complex private investigations, including missing persons/homicide ...

Andy's Hall of Shame
Welcome to my Hall of Shame. Note that I

Andy's Hardware
Lately, there has been interest from a ...

Andy's Dashboard
Andy's Dashboard A free charting and ...

Your Own Email Server Howto
Running Your Own Email Server on RHEL ...

A 10 Gigabit Network Howto
Solution: a 10 gigabit wired network to ...

100G Network Howto
100G Network Howto June 3, 2024 by ...

Investigations
Alice Ku Missing person in Taiwan was ...

Linux Tips and Tricks
Shortcut to open new Terminal window ...

Privoxy on macOS Howto
Privoxy on macOS Howto by Andrew ...

A Fractal Crystal Lattice of G...
This is a work in progress and the above ...

* Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.

Description: Bing search results for “Andrew Watters attorney” showing his “Hall of Shame” webpage as the primary result, demonstrating its role as the cornerstone of his law-office marketing website.

Source / URL: *See Below*

Captured by: Captured using Snagit (TechSmith) — Software v2024.1.2. by Ligia M. Parmenter

Date Captured: December 15, 2025 at 9:43 p.m. PST

True and Correct Copy: Yes — authenticated in declaration.

The above image is a true and correct screenshot captured by Plaintiff using Snagit (TechSmith Snagit, v. 2025) on December 15, 2025 at 9:43 p.m. PST. The screenshot accurately reflects the content as it appeared on the BING search at the ULR below.

<https://www.bing.com/search?q=andrew+watters+attorney&form=QBLH&sp=-1&ghc=1&lq=0&pq=andrew+watters+attorney&sc=5-23&qsn=&sk=&cvid=9ECB1666CD8A4494AFAEBA086879CF5B>

****NOTICE:** Search-engine snippet URLs (Google, Bing, Yahoo, DuckDuckGo, etc.) are dynamically generated, non-static links that frequently change based on indexing, algorithm updates, geolocation, personalization, and search-engine rotation. If copied and pasted at a later time, these URLs will likely not open the same content or may fail to open at all. Accordingly, reliance should be made on the authenticated screenshot exhibits included herein as the accurate representation of the content as it appeared on the date and time of capture.

** Highlighting (if any) added for the Court’s convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

EXHIBIT 5-D

EXHIBIT 5-D

YAHOO Search-Engine for “Andrew Watters Attorney” His “Hall of Shame” Is the Cornerstone of His Legal Services Website www.andrewwatters.com

The screenshot shows a Yahoo search engine interface. The search bar contains the text "ANDREW WATTERS ATTORNEY". Below the search bar, there are tabs for "All", "Local", "Images", "Videos", and "More". The "All" tab is selected. To the right of the tabs, there is a "Anytime" dropdown menu. The search results are displayed in a grid format. The first result is for "andrewwatters.com" with the URL "www.andrewwatters.com". The title is "Andrew Watters" and the description is "Attorney - general civil litigation and complex family law, with twenty years of experience and 40+ trials. Also available for complex private investigations, including missing persons/homicide...". Below this result, there are four more results, each with a title and a brief description:

- Andy's Hall of Shame**: Welcome to my Hall of Shame. Note that I also have a Hall of...
- Married**: Tina's Bio Tina was born in Hangzhou, the capital city of...
- Privoxy on macOS Howto**: Privoxy on macOS Howto by Andrew Watters This is a tutorial...
- The Forever War**: It is the year 2025. Following the recent end of World War...
- Linux Tips and Tricks**: Shortcut to open new Terminal window on Mac On Linux, you...
- A Fractal Crystal Lattice of Gauss...**: This is a work in progress and the above is how far I have...

* Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.

Description: YAHOO Search-Engine for “Andrew Watters Attorney” His “Hall of Shame” Is the Cornerstone of His Legal Services Website
www.andrewwatters.com

Source / URL: *See Below*

Captured by: Captured using Snagit (TechSmith) — Software v2024.1.2. by Ligia M. Parmenter

Date Captured: December 15, 2025 at 10:16 p.m. PST

True and Correct Copy: Yes — authenticated in declaration.

The above image is a true and correct screenshot captured by Plaintiff using Snagit (TechSmith Snagit, v. 2025) on December 15, 2025 at 10:16 p.m. PST. The screenshot accurately reflects the content as it appeared on the YAHOO search at the ULR below.

https://search.yahoo.com/search;_ylt=AwrjdDWX9kBpapMFIHtDDWVH;_ylc=X1MDMTE5NzgwNDg2NwRfcgMyBGZyAwRmcjIDcDpzLHY6c2ZwLG06c2ItG9wBGdwcmlkAzl0SU9Zd2dEUkNPYzhHS1Zvck1hRU EEbl9yc2x0AzAEbl9zdWdnAzIEb3JpZ2luA3NIYXJjaC55YWhvby5jb20EcG9zAzAEcHFzdHIDBHBxc3RybAMwBHFzdHJsAzIzBHF1ZXJ5A0FORFJFVyUyMFdBVFRFUIMIMjBBVFRPUk5FWQR0X3N0bXADMTC2NTg2NTEyMQ--?p=ANDREW+WATTERS+ATTORNEY&fr=sfp&fr2=p%3As%2Cv%3Asfp%2Cm%3Asb-top&iscqry=

****NOTICE:** Search-engine snippet URLs (Google, Bing, Yahoo, DuckDuckGo, etc.) are dynamically generated, non-static links that frequently change based on indexing, algorithm updates, geolocation, personalization, and search-engine rotation. If copied and pasted at a later time, these URLs will likely not open the same content or may fail to open at all. Accordingly, reliance should be made on the authenticated screenshot exhibits included herein as the accurate representation of the content as it appeared on the date and time of capture.

** Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

EXHIBIT 5-E

EXHIBIT 5-E

DUCKDUCKGO Search-Engine for “Andrew Watters Attorney” His “Hall of Shame” Is the Cornerstone of His Legal Services Website www.andrewwatters.com

The screenshot shows a DuckDuckGo search interface. The search bar contains the text "ANDREW WATTERS ATTORNEY". Below the search bar, there are navigation options: "All", "Images", "Videos", "News", and "More". To the right, there are links for "Search Assist", "Duck.ai", and a settings icon. Below the navigation bar, there are filters: "Protected", "All regions", "Safe search: moderate", and "Any time". The search results show a link to "andrewwatters.com" with the URL "https://www.andrewwatters.com". The main heading is "Andrew Watters". The bio text reads: "My Bio Hi, my name is Andrew G. Watters. I am a radically honest, category-defying polymath based in Redwood City, California, USA. I am primarily a lawyer, with a law degree from U.C. College of Law San Francisco (formerly known as U.C. Hastings College of Law), a bachelor's degree from UCLA, and twen...". Below the bio, there are several sections: "Andy's Hall of Shame" (Welcome to my Hall of Shame. Note that I also have a Hall of Fame with polar...), "Married" (Tina's Bio Tina was born in Hangzhou, the capital city of Zhejiang, China. Mar...), "Privoxy on macOS Howto" (Privoxy on macOS Howto by Andrew Watters This is a tutorial for absolute...), "Andy's Connections" (Andy's Connections An extraordinary matchmaking service based on cutting...), "Investigations" (Alice Ku Missing person in Taiwan was the victim of spousal homicide on...), and "The Forever War" (It is the year 2025. Following the recent end of World War III, there is a global...).

* Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.

Description: DUCKDUCKGO Search-Engine for “Andrew Watters Attorney” His “Hall of Shame” Is the Cornerstone of His Legal Services Website
www.andrewwatters.com

Source / URL: *See Below*

Captured by: Captured using Snagit (TechSmith) — Software v2024.1.2. by Ligia M. Parmenter

Date Captured: December 15, 2025 at 10:26 p.m. PST

True and Correct Copy: Yes — authenticated in declaration.

The above image is a true and correct screenshot captured by Plaintiff using Snagit (TechSmith Snagit, v. 2025) on December 15, 2025 at 10:26 p.m. PST. The screenshot accurately reflects the content as it appeared on the DUCKDUCKGO search at the ULR below.

https://duckduckgo.com/?ia=web&origin=funnel_home_google&t=h_&q=ANDREW+WATTERS+ATTORNEY
Y

****NOTICE:** Search-engine snippet URLs (Google, Bing, Yahoo, DuckDuckGo, etc.) are dynamically generated, non-static links that frequently change based on indexing, algorithm updates, geolocation, personalization, and search-engine rotation. If copied and pasted at a later time, these URLs will likely not open the same content or may fail to open at all. Accordingly, reliance should be made on the authenticated screenshot exhibits included herein as the accurate representation of the content as it appeared on the date and time of capture.

** Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

EXHIBIT 5-F

EXHIBIT 5-F

Screenshot of Watters' law-office website showing his professional headshot, attorney biography, credentials, and promotion of legal services, establishing the commercial and attorney-advertising nature of the website.

ANDREW WATTERS

MENU

MY BIO

Hi, my name is Andrew G. Watters. I am a radically honest, category-defying polymath based in Redwood City, California, USA. I am primarily a lawyer, with a law degree from U.C. College of Law San Francisco (formerly known as U.C. Hastings College of Law), a bachelor's degree from UCLA, and twenty years of professional experience. I have had my own practice since 2012, and my own law firm since 2016. I offer legal services, including complex private investigations; and a custom software platform for attorneys called Slash. I am married to Mrs. Right, with whom I welcomed our daughter Jennifer in 2022. My personal trademark is my carbon fiber briefcase from Tecknomonster, a combined aerospace/luggage company. For entertainment purposes, I recently resurrected a popular anonymous discussion board for lawyers called JD Underground, which has been a great diversion from the law firm for me. I also sometimes build computer systems and custom guitars, which I find to be self-actualizing. I am originally from San Francisco, which I always enjoy telling people because Dirty Harry shares my hometown. Finally, like Thanos and Tony Stark, I am cursed with knowledge-- and I try to use this substantial gift for positive things. Still trying to be a moderate Democrat.

* *Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

Description:	Screenshot of Watters' law-office website showing his professional headshot, attorney biography, credentials, and promotion of legal services, establishing the commercial and attorney-advertising nature of the website.
Source / URL:	https://www.andrewwatters.com
Captured by:	Captured using Snagit (TechSmith) — Software v2024.1.2. by Ligia M. Parmenter
Date Captured:	November 30, 2025 at 10:47 p.m. PST
True and Correct Copy:	Yes — authenticated in declaration.
Perma.cc Archival	This exhibit has been permanently archived on Perma.cc to preserve its contents and ensure the integrity. Perma.cc URL : https://perma.cc/AZ55-64SA

** Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

EXHIBIT 5-G

EXHIBIT 5-G

Archived capture of www.AndrewWatters.com showing a branded law-firm website used to promote Defendant's legal services and credentials, confirming its commercial and attorney-advertising nature.



** Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

Description: Archived capture of www.AndrewWatters.com showing a branded law-firm website used to promote Defendant's legal services and credentials, confirming its commercial and attorney-advertising nature.

Source / URL: www.andrewwatters.com

Captured by: Captured using Snagit (TechSmith) — Software v2024.1.2. by Ligia M. Parmenter

True and Correct Copy: Yes — authenticated in declaration.

Archival: **Archived Webpage Capture (Wayback Machine)**

Source: Internet Archive, Wayback Machine

Original URL: www.andrewwatters.com

Archived URL: wayback machine archived March 28, 2025

<https://web.archive.org/web/20250328052622/http://andrewwatters.com/>

Date Archived: March 28, 2025

Date Accessed by Declarant: January 2, 2026 at 6:31 a.m. PST

Captured and preserved using the Internet Archive Wayback Machine

EXHIBIT 5-H

EXHIBIT 5-H

Screenshot of www.andrewwatters.com identifying the domain as Defendant's law-firm website used to market legal services, not a personal blog or private forum.



* Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.

Description: Screenshot of www.andrewwatters.com identifying the domain as Defendant's law-firm website used to market legal services, not a personal blog or private forum.

Source / URL: *www.andrewwatters.com*

Captured by: Captured using Snagit (TechSmith) — Software v2024.1.2. by Ligia M. Parmenter

True and Correct Copy: Yes — authenticated in declaration.

Archival: **Archived Webpage Capture (Wayback Machine)**

Source: Internet Archive, Wayback Machine

Original URL: *www.andrewwatters.com*

Archived URL: wayback machine archived March 28, 2025

<https://web.archive.org/web/20250328052622/http://andrewwatters.com/>

Date Archived: March 28, 2025

Date Accessed by Declarant: January 2, 2026 at 6:31 a.m. PST

Captured and preserved using the Internet Archive Wayback Machine

EXHIBIT 5-1

EXHIBIT 5-I

State Bar of California Record for Andrew Watters clearly identifying www.AndrewWatters.com (where www.andrewwatters.com/hall-of-shame/ is hosted) as his law office website.

The State Bar of California | Log in | News | Forms | Contact

PUBLIC: Need Legal Help | Complaints & Claims | Free Legal Information | Discipline | Public Trust Liaison | En español

Legal Specialist Search

Finding the Right Lawyer

Attorney Search

Provisionally Licensed Lawyers

Legal Guides

Lawyer Referral Service

Problem with a Lawyer

Attorney Profile

Andrew George Watters #237990

License Status: Active

Address: Andrew G. Watters, Esq., 555 Twin Dolphin Dr, Ste 135, Redwood City, CA 94065-2139
Phone: 415-261-8527 | Fax: Not Available
Email: andrew@andrewwatters.com | Website: <https://www.andrewwatters.com/law/>

More about This Attorney ▾

License Status, Disciplinary and Administrative History

All changes of license status due to nondisciplinary administrative matters and disciplinary actions.

Date	License Status ⓘ	Discipline ⓘ	Administrative Action ⓘ
Present	Active		
11/22/2005		Admitted to the State Bar of California	

Additional Information:

- About the disciplinary system

Start New Search »

Protecting the public & enhancing the administration of justice.

PUBLIC
ABOUT US
ATTORNEYS
ADMISSIONS
ACCESS TO JUSTICE

News
Forms
Contact
Staff Log in

SAN FRANCISCO (Main Office)
180 Howard St.
San Francisco, CA 94105
415-538-2000

LOS ANGELES
845 S. Figueroa St.
Los Angeles, CA 90017
213-765-1000

* Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.

Description: State Bar of California Record for Andrew Watters clearly identifying www.AndrewWatters.com (where www.andrewwatters.com/hall-of-shame/ is hosted) as his law office website.

Source / URL: *State Bar of California – Archived Search for Andrew Watters –*
<https://apps.calbar.ca.gov/attorney/Licensee/Detail/237990>

Captured by: Captured using Snagit (TechSmith) — Software v2024.1.2. by Ligia M. Parmenter

True and Correct Copy: Yes — authenticated in declaration.

Archival: **Archived Webpage Capture (Wayback Machine)**
Source: Internet Archive, Wayback Machine
Original URL: *<https://apps.calbar.ca.gov/attorney/Licensee/Detail/237990>*

Archived URL: wayback machine archived March 28, 2025
<https://web.archive.org/web/20240916125613/https://apps.calbar.ca.gov/attorney/Licensee/Detail/237990>

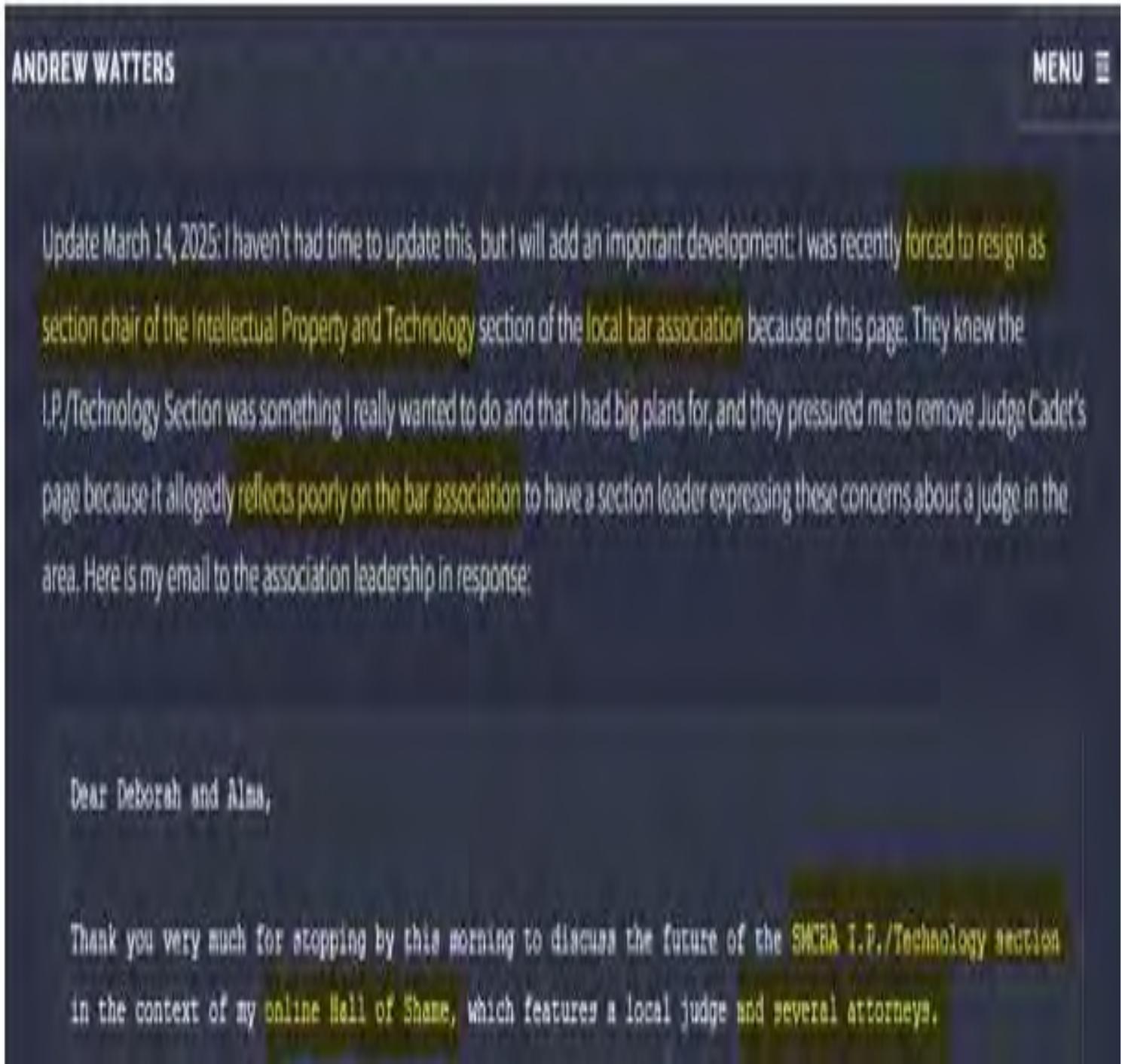
Date Archived: September 16, 2024

Date Accessed by Declarant: January 2, 2026 at 6:38 a.m. PST
Captured and preserved using the Internet Archive Wayback Machine

EXHIBIT 5-J

EXHIBIT 5-J

San Mateo County Bar Association forced resignation letter dated March 14, 2025, requiring Watters' resignation based on "Hall of Shame" content published on www.andrewwatters.com/hall-of-shame/, confirming the "Hall of Shame" as his principal attorney-advertising feature and not a personal endeavor as Watters attempts to repeatedly misrepresent.



Continued on following page.

* Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.

I should note that I also have a Hall of Fame on my website, which features several SMCA members along with their deserving praise. The intention is to be even-handed, but it seems like I have not succeeded in that effort when I'm being asked to reconsider part of the Hall of Shame because it reflects poorly on the Bar Association.

I have carefully thought about the options here in terms of the way forward, and I'm not seeing any besides (1) resign from my leadership role, or (2) remove Judge Cadet's Hall of Shame page, because that is obviously the offending page.

My bottom line is that I do not censor my 100% fair and 100% accurate online opinions for any reason, especially when I feel like the information should be public because it is important for litigants to know. I continue to receive numerous calls and emails supporting the Hall of Shame each month— not just about Judge Cadet, but about others who appear there. The page about Judge Cadet has become a repository of information from dissatisfied litigants and attorneys, all of which have only found this resource because it is available online.

Continued on following page.

** Highlighting (if any) added for the Court's convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

Unfortunately, I cannot accommodate your request to remove any portion of the Hall of Shame, and I'm willing to give up my section chair role to prove that I care more about the principle of free speech than the many professional or networking benefits that might accrue from continuing the role. I also don't want to set a precedent that I'm willing to edit my Hall of Shame on my personal website under the auspices of it reflecting poorly on the Bar Association.

Accordingly, I am tendering my resignation as section chair unless there is a different solution the Board would prefer. The upcoming event can be canceled considering there are no attendees.

Best,

Andrew Petroc

Update March 14, 2025: I haven't had time to update this, but I will add an important development: I was recently forced to resign as section chair of the Intellectual Property and Technology section of the local bar association because of this page. They knew the I.P./Technology Section was something I really wanted to do and that I had big plans for, and they pressured me to remove Judge Cadet's page because it allegedly reflects poorly on the bar association to have a section leader expressing these concerns about a judge in the area. Here is my email to the association leadership in response:

Dear Deborah and Alma,

Thank you very much for stopping by this morning to discuss the future of the SMCBA I.P./Technology section in the context of my online Hall of Shame, which features a local judge and several attorneys.

I should note that I also have a Hall of Fame on my website, which features several SMCBA members along with their deserving praise. The intention is to be even-handed, but it seems like I have not succeeded in that effort when I'm being asked to reconsider part of the Hall of Shame because it reflects poorly on the Bar Association.

I have carefully thought about the options here in terms of the way forward, and I'm not seeing any besides (1) resign from my leadership role, or (2) remove Judge Cadet's Hall of Shame page, because that is obviously the offending page.

My bottom line is that I do not censor my 100% fair and 100% accurate online opinions for any reason, especially when I feel like the information should be public because it is important for litigants to know. I continue to receive numerous calls and emails supporting the Hall of Shame each month-- not just about Judge Cadet, but about others who appear there. The page about Judge Cadet has become a repository of information from dissatisfied litigants and attorneys, all of which have only found this resource because it is available online.

Unfortunately, I cannot accommodate your request to remove any portion of the Hall of Shame, and I'm willing to give up my section chair role to prove that I care more about the principle of free speech than the many professional or networking benefits that might accrue from continuing the role. I also don't want to set a precedent that I'm willing to edit my Hall of Shame on my personal website under the auspices of it reflecting poorly on the Bar Association.

Accordingly, I am tendering my resignation as section chair unless there is a different solution the Board would prefer. The upcoming event can be canceled considering there are no attendees.

Best,

Andrew Watters

Description: San Mateo County Bar Association forced resignation letter dated March 14, 2025, requiring Watters' resignation based on "Hall of Shame" content published on www.andrewwatters.com/hall-of-shame/, confirming the "Hall of Shame" as his principal attorney-advertising feature and not a personal endeavor as Watters attempts to repeatedly misrepresent.

Source / URL: [https://www.**andrewwatters.com**/hall-of-shame/chinhayi-cadet/](https://www.andrewwatters.com/hall-of-shame/chinhayi-cadet/)

Captured by: Captured using Snagit (TechSmith) — Software v2024.1.2. by Ligia M. Parmenter

Date Captured: November 15, 2025 at 12:28 p.m. PST

True and Correct Copy: Yes — authenticated in declaration.

Perma.cc Archival This exhibit has been permanently archived on Perma.cc to preserve its contents and ensure the integrity.
Perma.cc URL : <https://perma.cc/WT6R-GYUX>

EXHIBIT 6-A-1

1-747 (Rev. 08-10-2016)



U.S. Department of Justice

Federal Bureau of Investigation
Criminal Justice Information Services Division
Clarkburg, WV 26306

LIGIA MARIA MELENDEZ

Date: 12-02-2025

The Criminal Justice Information Services (CJIS) Division of the Federal Bureau of Investigation (FBI) has completed the following fingerprint submission:

Subject Name

LIGIA MARIA MELENDEZ

Search Completed Result

12-02-2025

E2025336000000004673

A SEARCH OF THE FINGERPRINTS PROVIDED BY THIS INDIVIDUAL HAS REVEALED NO PRIOR ARREST DATA AT THE FBI. THIS DOES NOT PRECLUDE FURTHER CRIMINAL HISTORY AT THE STATE OR LOCAL LEVEL.

Date of Birth:

Social Security number:

The result of the above response is only effective for the date the submission was originally completed. For more updated information, please submit new fingerprints of the subject.

In order to protect Personally Identifiable Information, as of August 17, 2009, FBI policy has changed to no longer return the fingerprint cards. This form will serve as the FBI's official response.

This Identity History Summary (IdHS) is provided pursuant to 28 CFR 16.30-16.34 solely for you to conduct a personal review and/or obtain a change, correction, or updating of your record. This IdHS is not provided for the purpose of licensing or employment or any other purpose enumerated in 28 CFR 20.33.

Any questions may be addressed to the Customer Service Group at 304-625-5590. You may also visit the Web site at www.fbi.gov/checks for further instructions.

Chris Ormerod
Section Chief
Biometric Services Section
Criminal Justice Information
Services Division

EXHIBIT 6-A-2

Exhibit 6-A-2 —

True and correct copy of Plaintiff's valid U.S. passport and travel records (legal name: Ligia Maria Melendez), offered to authenticate identity and lawful travel history and to rebut Defendant's false claims of criminal activity in Mexico.





Let us raise a standard to which

the



We hold these truths to be self-evident, that all men are created equal, that they are endowed with certain

unalienable rights, that among these are life, liberty and the pursuit of happiness.

10



unalienable rights, that among these are life, liberty and the pursuit of happiness.

11

not given

Let every nation know
any hardship, support

Visas



well or
foe, in

14

Ill, that we shall pay any price, bear any burden, meet
order to assure the survival and the success of liberty,
John F. Kennedy

Visas

15

EXHIBIT 6-A-3

EXHIBIT 6-A-3 Public Federal Criminal Case Name Check (Zero Result) Ligia Maria Melendez
True and correct screenshot of a federal criminal case name search for "Ligia Maria Melendez" showing no criminal dockets, charges, or investigations, offered to rebut Defendant's false criminal accusations.

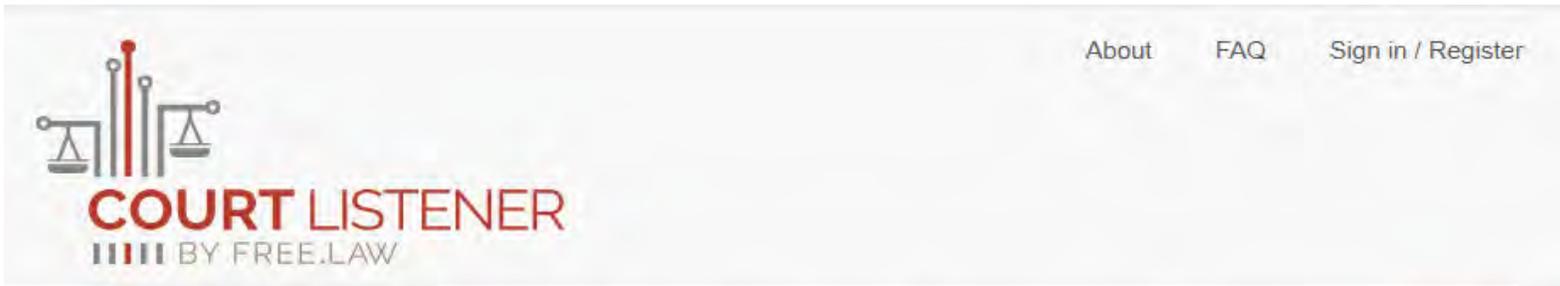
The screenshot shows the CourtListener website interface. At the top, there is a navigation bar with links for "About", "FAQ", and "Sign in / Register". The CourtListener logo is prominently displayed, featuring a stylized scale of justice and the text "COURT LISTENER BY FREE.LAW". Below the logo is a secondary navigation bar with dropdown menus for "Case Law", "RECAP Archive", "Oral Arguments", "Judges", and "Financial Disclosures", along with a "Donate" button.

The main search area includes a search bar containing the text "LIGIA MARIA MELENDEZ" and a "Search" button. To the left of the search bar is a "Refine Your Query" section with several filters: "Jurisdictions" set to "All", "Search Results Order" set to "Relevance", and empty input fields for "Case Name" and "Judge". Below these is a "Precedential Status" section with checkboxes for "Published (0)", "Unpublished (0)", "Errata (0)", "Separate (0)", "In-chambers (0)", and "Relating-to (0)".

The search results area displays a message: "Your search – Courts: All > Query: 'LIGIA MARIA MELENDEZ' > Published: True – had no results." Below this message are "Search tips" and a note about coverage page details. A "Quick Tip" at the bottom states that CourtListener has an API.

EXHIBIT 6-A-4

EXHIBIT 6-A-4 Public Federal Criminal Case Name Check (Zero Result) Ligia Parmenter
True and correct screenshot of a federal criminal case name search for "Ligia Parmenter" showing no criminal dockets, charges, or investigations, offered to rebut Defendant's false criminal accusations.



Case Law ▾ RECAP Archive ▾ Oral Arguments ▾ Judges ▾ Financial Disclosures ▾ [♥ Donate](#)

Refine Your Query

Jurisdictions **All**

Search Results Order:

Relevance ▾

Case Name:

Judge:

Precedential Status

- Published (0)
- Unpublished (0)
- Errata (0)
- Separate (0)
- In-chambers (0)
- Relating-to (0)
- Unknown (0)

"LIGIA PARMENTER"



Search

[Query Help](#)

Your search – Courts: All > Query: "LIGIA PARMENTER" > Published: True – had no results.

Search tips:

- Check your spelling.
- Try fewer filters.
- Remove quotes if you used them.
- Did you mean to [search on the RECAP Archive?](#)

Our [coverage page](#) details which jurisdictions we support.

If you expected more results than this, [please let us know](#). We value your feedback.

Quick Tip! We have a collection of more than 1,200 judicial portraits and we need volunteers to help collect them all.

EXHIBIT 6-B-1

EXHIBIT 6-B-1 Authorized Practice of Law — State Bar Licensure and Certification
Plaintiff is a licensed California attorney in good standing with an active law license, authorized to practice law without restriction, and no court or regulatory body has ever found her unfit or engaged in unlawful practice.

**THE STATE BAR OF CALIFORNIA
CERTIFICATE OF STANDING**

ISSUE DATE: 10/19/2025

LICENSEE NAME: Ligia M. Melendez Parmenter

LICENSEE BAR NUMBER: 176196

LICENSEE STATUS: Active

ADMIT DATE: 6/1/1995

To Whom it May Concern:

This certificate of standing certifies the record above is a true and correct copy of Ligia M. Melendez Parmenter's current standing with the State Bar of California as of the issue date. No recommendation for discipline for professional or other misconduct has ever been made by the Board of Trustees or a Disciplinary Board to the Supreme Court of the State of California.

Carolina Almarante-Terrero

Carolina Almarante-Terrero
Custodian of Record

NOTE: Only ACTIVE licensees of the State Bar of California are entitled to practice law in California (See Sections 6006 and 6125, et seq., Business and Professions Code.)

EXHIBIT 6-B-1 Authorized Practice of Law — State Bar Licensure and Certification

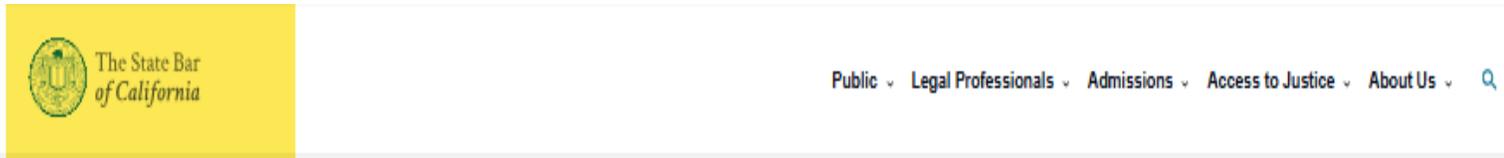
Plaintiff is a licensed California attorney in good standing with an active law license, authorized to practice law without restriction, and no court or regulatory body has ever found her unfit or engaged in unlawful practice.

EXHIBIT 6-B-2

EXHIBIT 6-B-2 State Bar of California Attorney Profile (Online, 24/7 Public Registry)

<https://apps.calbar.ca.gov/attorney/Licensee/Detail/176196>

True and correct screenshot of Plaintiff's State Bar of California attorney profile showing active licensure and good standing, submitted to authenticate lawful authorization to practice law and rebut Defendant's false claims.



Attorney Profile

Ligia M Melendez Parmenter #176196

License Status: Active

Address: PARMENTER LAW OFFICES, 501 B St Ste 200, San Rafael, CA 94901-3848

Phone: 415-738-7901 | Fax: 415-738-7901

Email: Imparmenter@lawpar.com | Website: <http://www.lawpar.com>

[More about This Attorney](#) ▾

License Status, Disciplinary and Administrative History

The table below shows an attorney's license status changes, disciplinary actions, and administrative actions. Some administrative suspensions are subject to automatic removal from the attorney profile page pursuant to the State Bar's [policy on removal of administrative actions](#). Administrative suspensions are non-disciplinary actions resulting from noncompliance with administrative requirements, such as the requirement to pay licensing fees or comply with Minimum Continuing Legal Education. Administrative suspensions that meet the criteria in the State Bar's policy on removal of administrative actions would not be displayed below.

Date	License Status ⓘ	Discipline ⓘ	Administrative Action ⓘ
Present	Active		
6/1/1995	Admitted to the State Bar of California		

Additional Information:

- [About the disciplinary system](#)

[Start New Search](#) »

EXHIBIT 6-B-2 State Bar of California Attorney Profile (Online, 24/7 Public Registry)

<https://apps.calbar.ca.gov/attorney/Licensee/Detail/176196>

True and correct screenshot of Plaintiff's State Bar of California attorney profile showing active licensure and good standing, submitted to authenticate lawful authorization to practice law and rebut Defendant's false claims.

Exhibit 6-B-3 — State Bar of California Attorney Fee Payment Records (2018–2025)
True and correct copies of official payment confirmations and fee statements from the State Bar of California’s My State Bar Profile, reflecting “Ligia Parmenter, Esq.” timely annual license fee payments and compliance with mandated financial obligations from 2018 through 2025. These records demonstrate that “Ligia Parmenter, Esq.” has consistently satisfied her licensing and compliance duties with the State Bar of California - as a practicing attorney, and further rebut Defendant Andrew Watters’ false assertion that Plaintiff is unlawfully practicing law.

EXHIBIT 6-B-3



Payment Summary

Ligia M. Melendez Parmenter (176196)

PARMENTER LAW OFFICES

501 B St Ste 200

San Rafael, CA 94901

Payment Reference:



Payment Method:

Payment Status:

Successful

Transaction Date:

Jan 26 2018

Item Description	Cost
2018 Annual License Fee	\$430.00
Grand Total	\$430.00



Payment Summary

Ligia M. Melendez Parmenter (176196)

PARMENTER LAW OFFICES

501 B St Ste 200

San Rafael, CA 94901

Payment Reference:

[REDACTED]

Payment Method:

[REDACTED]

Payment Status:

Successful

Transaction Date:

Jan 28 2020

Item Description	Cost
2020 Annual License Fee	\$544.00
Grand Total	\$544.00



Payment Summary

Ligia M. Melendez Parmenter (176196)

PARMENTER LAW OFFICES

501 B St Ste 200

San Rafael, CA 94901

Payment Reference: [REDACTED] 176196_2021_ [REDACTED]

Payment Method: [REDACTED]

Payment Status: Successful

Transaction Date: Feb 5 2021

Item Description	Cost
2021 Annual License Fee	\$515.00
Non-refundable Credit Card Service Fee	\$12.88
Grand Total	\$527.88



Information about your 2021 State Bar of California annual license fees

Rule 2.10 of the Rules of the State Bar states that “Annual license fees” are those fees that any licensee must pay to maintain active or inactive status in a calendar year.” The 2021 annual license fees were assessed December 1, 2020. The payment deadline is February 1, 2021. Failure to pay will lead to penalties and suspension. (Bus. & Prof. Code §6143.)

Active Fee

The 2021 active rate annual license fees is \$515 and is comprised of: a base fee of \$395 (Bus. & Prof. Code § 6140); \$40 for the Client Security Fund (§ 6140.55); \$25 for the discipline system (§6140.6); \$10 for Lawyer Assistance Program (§6140.9); and \$45 for Legal Services Assistance (§6140.03).

Attorneys may also make donations, take deductions, accrue fees and be assessed costs, late fees and other penalties (§§6140.5(c), 6140.7, 6143). The deadline to pay is February 1, 2021. Late payments will incur penalties of \$100. Failure to pay by the deadline will lead to penalties and suspension (§6143).

Inactive Fee

The 2021 inactive rate annual license fees is \$182.40 and is comprised of: a base fee of \$97.40 (Bus. & Prof. Code §6141); \$10 for the Client Security Fund (§ 6140.55); \$25 for the discipline system (§6140.6); \$5 for Lawyer Assistance Program (§6140.9); and \$45 for Legal Services Assistance (§6140.03).

Attorneys may also make donations, take deductions, accrue fees and be assessed costs, late fees and other penalties (§§6140.5(c), 6140.7, 6143). The deadline to pay is February 1, 2021. Late payments will incur penalties of \$30. Failure to pay by the deadline will lead to penalties and suspension (§6143).

Multijurisdictional Practice (MJP) Fee

The 2021 MJP rate is \$515. Applies to out-of-state attorneys registered with the State Bar as legal aid attorneys (formerly called registered legal services attorneys) or in-house counsel. See Active Fee breakdown above.

Optional Deductions

- Attorneys are not required to pay and may deduct five dollars (\$5) from their annual fees if they do not wish to support lobbying and related activities of the State Bar that are outside the parameters for expenditures of mandatory dues set forth in *Keller*. Cal. Bus. & Prof. Code §6140.05.
- Attorneys are not required to pay and may deduct two dollars (\$2) from their annual fees if they do not wish to support programs that address concerns of access and bias in the legal profession and the justice system.
- Attorneys are not required to pay and may deduct forty five dollars (\$45) from their annual fees if they do not wish to support nonprofit organizations that provide free legal services to persons of limited means. Cal. Bus. & Prof. Code § 6140.03.



Payment Summary

Ligia M. Melendez Parmenter (176196)
PARMENTER LAW OFFICES
501 B St Ste 200

San Rafael, CA 94901

Payment Reference: [REDACTED] 176196_2022_1 [REDACTED]
Payment Method: [REDACTED]
Payment Status: Successful
Transaction Date: Jan 20 2022

Item Description	Cost
2022 Annual License Fee	\$515.00
Legislative Activity Deduction	(\$5.00)
Elimination of Bias Deduction	(\$2.00)
Legal Services Assistance Deduction	(\$45.00)
Grand Total	\$463.00



Information about your 2022 State Bar of California annual license fees

Rule 2.10 of the Rules of the State Bar states that “Annual license fees” are those fees that any licensee must pay to maintain active or inactive status in a calendar year.” The 2022 annual license fees were assessed December 1, 2021. The payment deadline is February 1, 2022. Failure to pay will lead to penalties and suspension. (Bus. & Prof. Code §6143.)

Active Fee

The 2022 active rate annual license fees is \$515 and is comprised of: a base fee of \$395 (Bus. & Prof. Code § 6140); \$40 for the Client Security Fund (§ 6140.55); \$25 for the discipline system (§6140.6); \$10 for Lawyer Assistance Program (§6140.9); and \$45 for Legal Services Assistance (§6140.03).

Attorneys may also make donations, take deductions, accrue fees and be assessed costs, late fees and other penalties (§§6140.5(c), 6140.7, 6143). The deadline to pay is February 1, 2022. Late payments will incur penalties of \$100. Failure to pay by the deadline will lead to penalties and suspension (§6143).

Inactive Fee

The 2022 inactive rate annual license fees is \$182.40 and is comprised of: a base fee of \$97.40 (Bus. & Prof. Code §6141); \$10 for the Client Security Fund (§ 6140.55); \$25 for the discipline system (§6140.6); \$5 for Lawyer Assistance Program (§6140.9); and \$45 for Legal Services Assistance (§6140.03).

Attorneys may also make donations, take deductions, accrue fees and be assessed costs, late fees and other penalties (§§6140.5(c), 6140.7, 6143). The deadline to pay is February 1, 2022. Late payments will incur penalties of \$30. Failure to pay by the deadline will lead to penalties and suspension (§6143).

Multijurisdictional Practice (MJP) Fee

The 2022 MJP rate is \$515. Applies to out-of-state attorneys registered with the State Bar as legal aid attorneys (formerly called registered legal services attorneys) or in-house counsel. See Active Fee breakdown above.

Optional Deductions

- Attorneys are not required to pay and may deduct five dollars (\$5) from their annual fees if they do not wish to support lobbying and related activities of the State Bar that are outside the parameters for expenditures of mandatory dues set forth in *Keller*. Cal. Bus. & Prof. Code §6140.05.
- Attorneys are not required to pay and may deduct two dollars (\$2) from their annual fees if they do not wish to support programs that address concerns of access and bias in the legal profession and the justice system.
- Attorneys are not required to pay and may deduct forty five dollars (\$45) from their annual fees if they do not wish to support nonprofit organizations that provide free legal services to persons of limited means. Cal. Bus. & Prof. Code § 6140.03.



Payment Summary

Ligia M. Melendez Parmenter (176196)
501 B St Ste 200
San Rafael, CA 94901

Payment Reference: [REDACTED]_176196_2023 [REDACTED]
Payment Method: [REDACTED]
Payment Status: Successful
Transaction Date: Jan 31 2023

Item Description	Cost
2023 Annual License Fee	\$510.00
Elimination of Bias Deduction	(\$2.00)
Legal Services Assistance Deduction	(\$45.00)
Grand Total	\$463.00



Information about your 2023 State Bar of California annual license fees

Rule 2.10 of the Rules of the State Bar states: “Annual license fees” are those fees that any licensee must pay to maintain active or inactive status in a calendar year. The 2023 annual license fees were assessed December 1, 2022. The payment deadline is February 1, 2023. Failure to pay will lead to penalties and suspension. (Bus. & Prof. Code §6143.)

Active Fee

The 2023 active rate annual license fees is \$510 and is comprised of: a base fee of \$390 (Bus. & Prof. Code § 6140); \$40 for the Client Security Fund (§ 6140.55); \$25 for the discipline system (§6140.6); \$10 for Lawyer Assistance Program (§6140.9); and \$45 for Legal Services Assistance (§6140.03).

Attorneys may also make donations, take deductions, accrue fees and be assessed costs, late fees and other penalties (§§6140.5(c), 6140.7, 6143). The deadline to pay is February 1, 2023. Late payments will incur penalties of \$100. Failure to pay by the deadline will lead to penalties and suspension (§6143).

Inactive Fee

The 2023 inactive rate annual license fees is \$177.40 and is comprised of: a base fee of \$92.40 (Bus. & Prof. Code §6141); \$10 for the Client Security Fund (§ 6140.55); \$25 for the discipline system (§6140.6); \$5 for Lawyer Assistance Program (§6140.9); and \$45 for Legal Services Assistance (§6140.03).

Attorneys may also make donations, take deductions, accrue fees and be assessed costs, late fees and other penalties (§§6140.5(c), 6140.7, 6143). The deadline to pay is February 1, 2023. Late payments will incur penalties of \$30. Failure to pay by the deadline will lead to penalties and suspension (§6143).

Multijurisdictional Practice (MJP) Fee

The 2023 MJP rate is \$510. Applies to out-of-state attorneys registered with the State Bar as legal aid attorneys (formerly called registered legal services attorneys) or in-house counsel. See Active Fee breakdown above.

Optional Deductions

- Attorneys are not required to pay and may deduct two dollars (\$2) from their annual fees if they do not wish to support programs that address concerns of access and bias in the legal profession and the justice system.
- Attorneys are not required to pay and may deduct forty five dollars (\$45) from their annual fees if they do not wish to support nonprofit organizations that provide free legal services to persons of limited means. Cal. Bus. & Prof. Code § 6140.03.



Payment Summary

Ligia M. Melendez Parmenter (176196)
501 B St Ste 200
San Rafael, CA 94901

Payment Reference: [REDACTED] 176196_2024 [REDACTED]

Payment Method: [REDACTED]

Payment Status: Successful

Transaction Date: Jan 27 2024

Item Description	Cost
2024 Annual License Fee	\$510.00
Elimination of Bias Deduction	(\$2.00)
Legal Services Assistance Deduction	(\$45.00)
Non-refundable Credit Card Service Fee	\$11.58
Grand Total	\$474.58



Information about your 2024 State Bar of California annual fees

Rule 2.10 of the Rules of the State Bar states: “Annual fees” are those fees that any licensee must pay to maintain active or inactive status in a calendar year. The 2024 annual fees were assessed December 1, 2023. The payment deadline is February 1, 2024. Failure to pay will lead to penalties and suspension. (Bus. & Prof. Code §6143.)

Active Fee

The 2024 active rate annual license fees is \$510 and is comprised of: a base fee of \$390 (Bus. & Prof. Code § 6140); \$40 for the Client Security Fund (§ 6140.55); \$25 for the discipline system (§6140.6); \$10 for Lawyer Assistance Program (§6140.9); and \$45 for Legal Services Assistance (§6140.03).

Attorneys may also make donations, take deductions, accrue fees and be assessed costs, late fees and other penalties (§§6140.5(c), 6140.7, 6143). The deadline to pay is February 1, 2024. Late payments will incur penalties. Failure to pay by the deadline will lead to penalties and suspension (§6143).

Inactive Fee

The 2024 inactive rate annual license fees is \$182.40 and is comprised of: a base fee of \$97.40 (Bus. & Prof. Code §6141); \$10 for the Client Security Fund (§ 6140.55); \$25 for the discipline system (§6140.6); \$5 for Lawyer Assistance Program (§6140.9); and \$45 for Legal Services Assistance (§6140.03).

Attorneys may also make donations, take deductions, accrue fees and be assessed costs, late fees and other penalties (§§6140.5(c), 6140.7, 6143). The deadline to pay is February 1, 2024. Late payments will incur penalties of \$30. Failure to pay by the deadline will lead to penalties and suspension (§6143).

Multijurisdictional Practice (MJP) Fee

The 2024 MJP rate is \$510. Applies to out-of-state attorneys registered with the State Bar as legal aid attorneys (formerly called registered legal services attorneys) or in-house counsel. See Active Fee breakdown above.

Optional Deductions

- Attorneys are not required to pay and may deduct two dollars (\$2) from their annual fees if they do not wish to support programs that address concerns of access and bias in the legal profession and the justice system.
- Attorneys are not required to pay and may deduct forty five dollars (\$45) from their annual fees if they do not wish to support nonprofit organizations that provide free legal services to persons of limited means. Cal. Bus. & Prof. Code § 6140.03.



Payment Summary

Ligia M. Melendez Parmenter (176196)
501 B St Ste 200
San Rafael, CA 94901

Payment Reference: [REDACTED] 176196_2025 [REDACTED]

Payment Method: [REDACTED]

Payment Status: Successful

Transaction Date: Mar 20 2025

Item Description	Cost
2025 Annual License Fee	\$598.00
Elimination of Bias Deduction	(\$2.00)
Legal Services Assistance Deduction	(\$45.00)
Non-refundable Credit Card Service Fee	\$13.78
Grand Total	\$564.78



Information about your 2025 State Bar of California annual fees

Rule 2.10 of the Rules of the State Bar states: “Annual fees” are those fees that any licensee must pay to maintain active or inactive status in a calendar year. The 2025 annual fees were assessed February 1, 2025. The payment deadline is April 1, 2025. Failure to pay will lead to penalties and suspension. (Bus. & Prof. Code §6143.)

Active Fee

The 2025 active rate annual license fees is \$598 and is comprised of: a base fee of \$400 (Bus. & Prof. Code § 6140); \$15 for Lease Costs (§ 6140.10); \$52 for Employee Salaries and Benefits (§ 6140.11); \$5.50 for Client Trust Account Compliance Reviews and Audits (§ 6140.13); \$5.50 for Disciplinary Diversion Pilot Programs (§ 6140.14); \$40 for the Client Security Fund (§ 6140.55); \$25 for the discipline system (§6140.6); \$10 for Lawyer Assistance Program (§6140.9); and \$45 for Legal Services Assistance (§6140.03).

Attorneys may also make donations, take deductions, accrue fees and be assessed costs, late fees and other penalties (§§6140.5(c), 6140.7, 6143). The deadline to pay is April 1, 2025. Late payments will incur penalties. Failure to pay by the deadline will lead to penalties and suspension (§6143).

Inactive Fee

The 2025 inactive rate annual license fees is \$205 and is comprised of: a base fee of \$100 (Bus. & Prof. Code § 6140); \$3.50 for Lease Costs (§ 6140.10); \$14 for Employee Salaries and Benefits (§ 6140.11); \$1.25 for Client Trust Account Compliance Reviews and Audits (§ 6140.13); \$1.25 for Disciplinary Diversion Pilot Programs (§ 6140.14); \$10 for the Client Security Fund (§ 6140.55); \$25 for the discipline system (§6140.6); \$5 for Lawyer Assistance Program (§6140.9); and \$45 for Legal Services Assistance (§6140.03).

Attorneys may also make donations, take deductions, accrue fees and be assessed costs, late fees and other penalties (§§6140.5(c), 6140.7, 6143). The deadline to pay is April 1, 2025. Late payments will incur penalties. Failure to pay by the deadline will lead to penalties and suspension (§6143).

Multijurisdictional Practice (MJP) Fee

The 2025 MJP rate is \$598. Applies to out-of-state attorneys registered with the State Bar as legal aid attorneys (formerly called registered legal services attorneys) or in-house counsel. See Active Fee breakdown above.

Optional Deductions

- Attorneys are not required to pay and may deduct two dollars (\$2) from their annual fees if they do not wish to support programs that address concerns of access and bias in the legal profession and the justice system.
- Attorneys are not required to pay and may deduct forty five dollars (\$45) from their annual fees if they do not wish to support nonprofit organizations that provide free legal services to persons of limited means. Cal. Bus. & Prof. Code § 6140.03.



The State Bar *of California*

EXHIBIT 6-B-4

True and correct copy of a redacted Parmenter Law Offices business checking account statement showing Plaintiff's authorized signatory status and ongoing activity consistent with a bona fide law practice, submitted to rebut Defendant's false claim of unlawful practice.



EXHIBIT 6-B-5

**EXHIBIT 6-B-5 Ligia Parmenter, Esq.'s State Bar Client Fund Account
(Redacted for Protection Against Crime and Fraud)**

True and correct redacted documentation confirming Plaintiff's compliant State Bar client trust account, submitted to authenticate lawful and ethical administration of client funds.

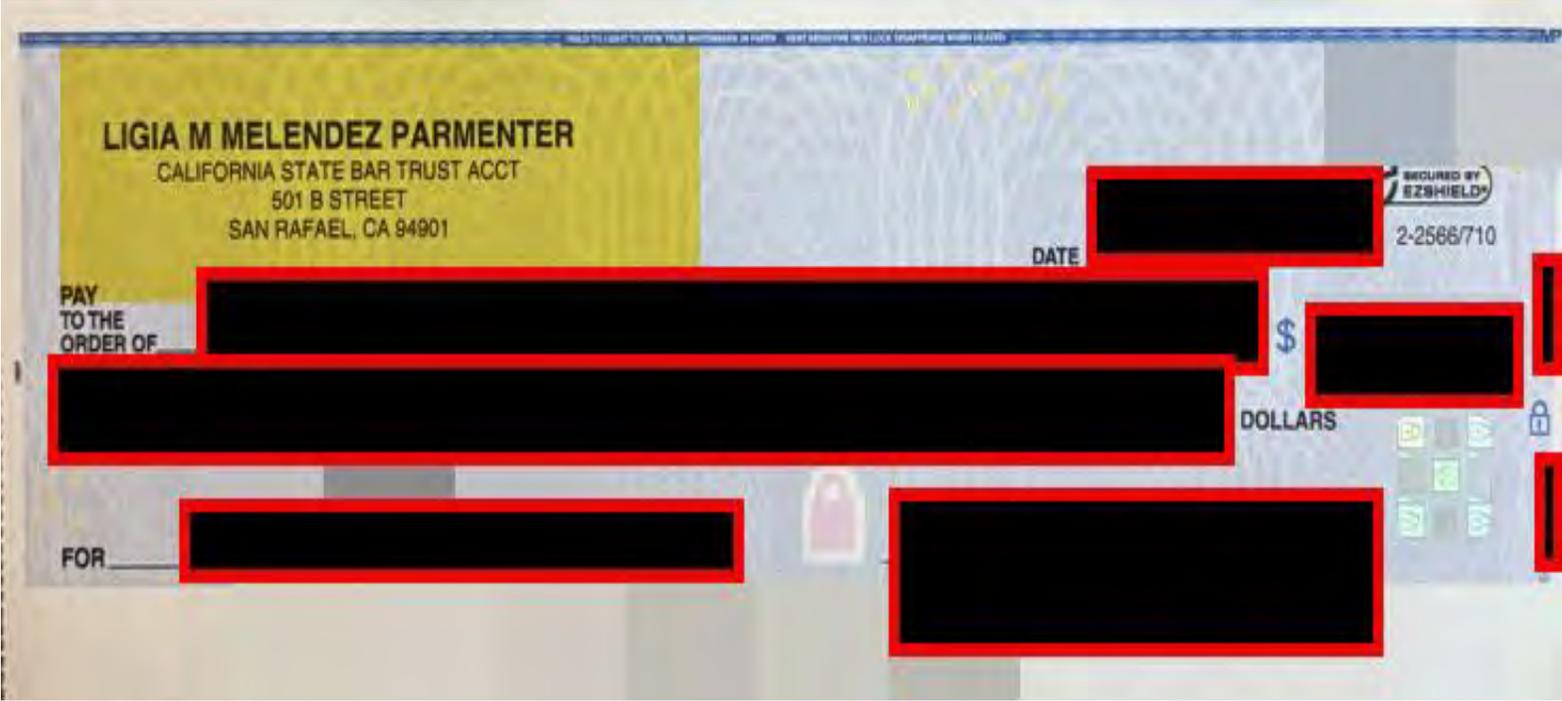


EXHIBIT 6-C-1

EXHIBIT 6-C-1

CERTIFICATION OF FIRST-ATTEMPT CALIFORNIA BAR ADMISSION ACHIEVEMENT AND PROFESSIONAL ATTORNEY COMPETENCE

I, Ligia M. Melendez Parmenter, Esq., Cal. State Bar No. 176196, declare and certify as follows:

1. I am not a mentally deficient lawyer. By way of example, I passed the California Bar Examination on my first attempt. In 1995 the bar pass rate in California was just 37–40%.
2. I did not request, receive, or require extended examination time or other testing accommodations.
3. I did not enroll in, attend, or complete any bar-exam preparatory course, review class, or formal bar-exam training program.
4. I prepared independently and passed without institutional instruction or paid bar review.
5. I have remained authorized to practice law as a California attorney since admission on June 1, 1995, with no suspension, disbarment, or practice restriction based on competency or capacity.
6. I affirm that I am not a mentally deficient lawyer. In the past 30 years, I have handled numerous highly complex legal matters for my clients and prevailed, demonstrating professional competence, sound judgment, and full capacity to practice law without limitation or impairment.

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

Executed on: January 2, 2026



Ligia M. Melendez Parmenter, Esq.

EXHIBIT 6-C-2

True and correct screenshot of Plaintiff's State Bar of California attorney profile showing an active, unrestricted license, evidencing no limitations based on mental capacity, fitness, or criminal conduct.

Attorney Profile

Ligia M Melendez Parmenter #176196

License Status: **Active**

Address: PARMENTER LAW OFFICES, 501 B St Ste 200, San Rafael, CA 94901-3846

Phone: 415-738-7901 | Fax: 415-738-7901

Email: Imparmenter@lawpar.com | Website: <http://www.lawpar.com>

[More about This Attorney ▼](#)

EXHIBIT 6-C-3

EXHIBIT 6-C-3

CERTIFICATION OF ATTORNEY MANUEL A. JUAREZ, ESQ.

Personal Knowledge of Plaintiff’s Competence, Stability, and Unrestricted Capacity to Practice Law

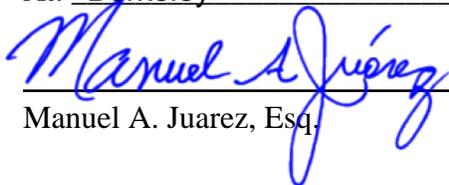
I, Manuel A. Juarez, Esq., declare as follows. I am a licensed attorney admitted to practice law. This declaration is based upon my personal knowledge and direct professional collaboration with Plaintiff Ligia M. Melendez Parmenter, Esq.

1. I have known Plaintiff Ligia Parmenter, Esq. since law school in the year 1991, and we have remained professional colleagues to this date.
2. Over more than thirty (30) years, I have worked with Ms. Parmenter in connection with numerous complex legal matters, including civil litigation, evidentiary preparation, and legal strategy. Ms. Parmenter is a Spanish speaking attorney.
3. During my decades of direct observation and professional collaboration, I have never observed Ms. Parmenter exhibit mental instability, cognitive impairment, or conduct suggesting mental deficiency, incompetence, or lack of fitness to practice law.
4. To the contrary, I have observed Ms. Parmenter consistently demonstrate sound judgment, professional stability, ethical compliance, and sustained competence in handling complex legal matters and prevailing for clients through diligent, lawful advocacy.
5. Based on my personal knowledge and experience working with Ms. Parmenter, any assertion that she is a “mentally deficient” or “mentally unstable” attorney is false and inconsistent with her long-standing professional performance and capacity.

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

Executed on: January 2, 2026, 2026

At: Berkeley, California



Manuel A. Juarez, Esq.

EXHIBIT 6-C-4



November 7, 2025

Name: Ligia Parmenter

DOB: [REDACTED]

RE: Clinical Summary

To Whom It May Concern,

I am writing to provide a clinical summary of my assessment of Ligia Parmenter, a [REDACTED] year-old Hispanic female attorney who presented for evaluation following significant emotional distress related to a cyber-harassment defamation incident. The client has been a licensed attorney since 1995 and has maintained a successful legal career for three decades. Her symptoms began in June-July 2024 after discovering a defamatory website created by a colleague, which contained false statements about her. She reports this incident as traumatic, especially as these statements, which include that she is a criminal, appear prominently on major search-engines when her name is searched on a 24/7 basis.

Ligia currently endorses severe anxiety and depressive symptoms, including persistent sadness, intrusive worry, hypervigilance, rumination about how others perceive her, diminished appetite, loss of interest in previously enjoyed activities, and chronic sleep disruption marked by nocturnal panic episodes. She also reports significant occupational impairment, noting that tasks previously completed in a few hours now require several days due to excessive checking behaviors and intense fear of making errors. She describes emotional exhaustion and burnout.

Ligia's symptoms have strained her family relationships and reduced her ability to fulfill caregiving responsibilities for her elderly [REDACTED]. While [REDACTED] remain supportive, they have expressed emotional fatigue in response to her distress. Ligia avoids disclosing her symptoms to avoid burdening them.

Standardized assessments were administered. She scored 21 on the PHQ-9 (severe depression) and 21 on the GAD-7 (severe generalized anxiety). Her MoCA score was 30/30, indicating intact cognitive functioning and supporting that her functional impairments stem from emotional distress rather than cognitive decline.

Based on the evaluation, Ligia meets criteria for Adjustment Disorder with Mixed Anxiety and Depressed Mood (F43.23). Her symptoms are directly linked to the traumatic nature of the defamation incident and have resulted in substantial impairment across occupational, relational, emotional, and caregiving domains.

Please feel free to contact me if additional information or clarification is required.

Sincerely,

(650) 429 - 8076 • joseperezlmft@gmail.com • www.josepereztherapy.com



Psychological Assessment

Name: Ligia Parmenter

DOB: [REDACTED]

Presenting Problem

Client is a [REDACTED] Hispanic female attorney seeking services due to significant distress following ongoing incidents of cyber-harassment and defamation by another lawyer. Client reports that the other lawyer created a website specifically intended to discredit and demean her character, including false statements referring to her as “crazy attorney,” “batshit-insane,” and a criminal “RICO” violator in “Mexico” and that “she should not be practicing law.”

Client reports symptoms of anxiety, depressive distress, and hypervigilance. She reports persistent sadness and recurrent thoughts about whether others view her as “crazy.” She states she sought medical care and was prescribed medication to help manage her heightened anxiety. Client describes notable sleep disturbances, including difficulty falling asleep due to prolonged rumination, waking multiple times throughout the night, and experiencing nocturnal panic episodes that begin in her stomach and move to her chest. She reports intrusive thoughts throughout the day, fear that something bad may happen, and a pervasive sense of being scared and on high alert.

Client expresses concern that judges or opposing counsel may be “judging me,” and reports feeling helpless. Additional symptoms include reduced appetite and anhedonia around eating, sometimes skipping meals altogether, persistent stress, and excessive worry about the harm caused to her and her reputation.

Client also reports significant occupational impairment. She describes heightened hypervigilance and a need to “triple check” her work, leading to emotional exhaustion and burnout. Tasks that previously took approximately four hours, such as accounting responsibilities, now take her two to three days due to fear of making even minor mistakes and ongoing mental preoccupation with the situation.

History of Presenting Problem

Client reports that her symptoms began in June-July 2024, coinciding with her discovery of the website and worsened severely in 2025 forward.

Risk Assessment

Aggressive behaviors in the past year: none reported

Suicidal/Homicidal Intent: no suicidal ideation reported; no homicidal intent reported



Family History & Relationships

Client has been [REDACTED] as positive.

Client notes that her current stress and increased time spent on work-related tasks have impacted the quality of time she is able to spend with her family. She reports decreased [REDACTED] [REDACTED] becomes depressed when the client is unable to visit; the client identifies herself as the [REDACTED] only visitor. Additionally, the client notes reduced ability to visit and care for her [REDACTED] due to work demands and emotional burnout. These circumstances have significantly affected her capacity to engage in her usual caregiving responsibilities.

Social Relationships & Support System

Client reports avoiding discussing her current stressors with others due to concern about burdening them. She intentionally refrains from sharing details with her [REDACTED], noting that they would become distressed. Client states that while her [REDACTED] supportive, [REDACTED] expressed fatigue arising from the stress and secondary trauma of observing the severe emotional and psychological injury caused to his [REDACTED] this ongoing matter.

Current Living Situation

Client resides in a home [REDACTED].

Self-care & Extracurricular activities

Client reports a significant reduction in previously enjoyed activities, noting that she no longer engages in shopping or other leisure pursuits. She states that she primarily focuses on work and does “nothing at all” outside of work-related responsibilities. Client has recently attempted to incorporate minimal physical activity into her routine.

Legal Difficulties

Client’s current legal concerns are limited to the defamation case against her colleague.

Trauma History

Client reports that discovering the website and navigating the ongoing cyber-harassment and defamation case have been traumatic experiences for her.

Alcohol & Substance Use

Client reports no alcohol and substance use.



Education & Occupational History

Client holds a bachelor's degree in [REDACTED], with a minor in [REDACTED], from [REDACTED]. She subsequently earned her Juris Doctor [REDACTED] in 1995 and was admitted to the State Bar that same year. She has been practicing law continuously since her admission.

Previous Treatment & Psychiatric Hospitalizations

Client reports that she has never in her life had any mental health conditions of “mental deficiency” or “mental instability” issues and never had to take any medications to deal with stress or any mental and emotional concerns until this matter arose.

Psychometric Measures

Patient Health Questionnaire – 9 (PHQ-9)

- **Score: 21**
- Interpretation: Severe Depression
- A PHQ-9 score of 21 falls in the severe depression range. This indicates:
 - Near-daily depressive symptoms
 - Marked loss of interest/pleasure
 - Significant sleep disturbance
 - Daytime fatigue and low motivation
 - Difficulty concentrating
 - Appetite disturbance
 - Feelings of sadness, guilt, or emotional overwhelm
 - High likelihood of functional impairment across multiple settings
- Given the clinical presentation, this score is consistent with the client's significant sadness, anhedonia, poor sleep, reduced appetite, burnout, and withdrawal from normal activities.

Generalized Anxiety Disorder – 7 (GAD-7)

- **Score: 21**
- Interpretation: Severe Generalized Anxiety
- A GAD-7 score of 21 reflects severe anxiety, the highest range possible. This indicates:
 - Persistent and uncontrollable worry
 - Physiological anxiety symptoms such as chest tightness, stomach anxiety, or panic episodes
 - Feeling constantly “on edge” or hyperalert
 - Difficulty relaxing
 - Racing thoughts and intrusive worry



- Anticipatory anxiety or fear that something bad may happen
- Significant distress and impairment
- This score strongly aligns with the client’s reported hypervigilance, intrusive thoughts, panic episodes, anticipatory fear, and pervasive worry about being judged by colleagues, judges, or the community.

Montreal Cognitive Assessment (MoCA)

- **Score: 30/30**
- Interpretation: Intact Cognitive Functioning
- A perfect MoCA score shows:
 - No evidence of neurocognitive impairment
 - Cognitive domains (memory, attention, executive function, language, visuospatial skills) are functioning normally
 - Cognitive difficulties described by the client (e.g., slowed work pace, difficulty focusing) are most likely secondary to emotional distress, not cognitive decline
- This result supports the interpretation that depression, anxiety, and trauma-related stress—not a neurological condition—are responsible for her concentration and efficiency problems.

Functional Impairments

Occupational & Professional Functioning

- Significant decline in work efficiency and productivity, as evidenced by tasks that previously took four hours now requiring two to three days due to hypervigilance, fear of errors, and compulsive “triple checking.”
- Difficulty concentrating and sustaining attention due to intrusive thoughts, persistent worry, and ongoing rumination related to the defamation incident.
- Increased emotional exhaustion and burnout, impacting her ability to maintain her usual professional standards.
- Heightened fear of negative evaluation by judges, colleagues, or opposing counsel, impairing her confidence and professional presence.

Daily Living and Routine Functioning

- Reduced participation in previously enjoyed activities, such as shopping or leisure activities, indicating impairment in engagement in daily life.
- Disrupted sleep patterns, including difficulty falling asleep, frequent awakenings, and nocturnal panic episodes, contributing to daytime fatigue and cognitive inefficiency.
- Decreased appetite and irregular eating patterns, sometimes skipping meals entirely, suggesting impaired self-care.



Social and Interpersonal Functioning

- Withdrawal from social interactions due to fear of burdening others and avoidance of discussing distressing events.
- Strained family dynamics: [REDACTED] supportive, [REDACTED] expressed fatigue arising from stress and secondary trauma of observing the severe emotional and psychological injury caused to [REDACTED] ongoing matter.
- Limited emotional availability for [REDACTED] extended family due to preoccupation with stressors.

Caretaking Responsibilities

- Reduced capacity to fulfill caregiving roles, including decreased visits to her [REDACTED] and her [REDACTED] nursing home.
- Emotional burnout impacting ability to provide consistent support, which has secondary emotional consequences for her [REDACTED], who rely solely on her for visitation.

Psychological and Emotional Functioning

- Persistent anxiety, hypervigilance, and intrusive thoughts, impairing her ability to regulate emotions throughout the day.
- Panic attacks that interfere with daily functioning and sleep.
- Depressive symptoms, including sadness, anhedonia, decreased motivation, and hopelessness.
- Trauma-related distress, as client identifies the cyber-harassment and defamation incident as a traumatic experience with ongoing psychological impact.

Overall Quality of Life

- Marked reduction in well-being, including diminished joy, increased fearfulness, and pervasive stress.
- Compromised ability to maintain balance between work, family, and self-care, resulting in significant functional decline across multiple areas of life.

Mental Status Exam

Affect: Anxious, tearful at times, with constricted range.

Mood: Self-reported sadness, fearfulness, and emotional exhaustion.

Thought Content: Intrusive thoughts related to defamation, fear of judgment by colleagues and judiciary, catastrophic thinking, and excessive worry.

Sleep: Fragmented with frequent awakenings and panic episodes.

Cognition: Concentration impaired by rumination and hypervigilance; slowed task completion.



Insight/Judgment: Good insight into distress but difficulty regulating emotional response.

Behavior: Social withdrawal, avoidance of discussing stressors, reduced engagement in previously enjoyed activities.

Diagnosis

Client's symptoms emerged in direct temporal relation to an identifiable psychosocial stressor (defamation and harassment), with no evidence of an alternative precipitating event. The symptom profile includes persistent worry, hypervigilance, intrusive distress, sadness, sleep disturbance, appetite disruption, impaired concentration, panic episodes, and notable functional decline across occupational, social, and caregiving domains.

This constellation is most consistent with **Adjustment Disorder with Mixed Anxiety and Depressed Mood (F43.23)**, given:

- Clear precipitating stressor
- Emotional and behavioral symptoms disproportionate to the stressor
- Significant impairment without meeting full criteria for a primary mood or anxiety disorder
- Symptoms occurring within a few months of the stressor and persisting as the stressor continues

The presence of trauma-like responses (intrusive thoughts, hyperarousal, and panic) suggests the need to monitor for a trauma- and stressor-related disorder; however, symptom presentation currently remains most aligned with Adjustment Disorder.

Clinical Summary

The client is experiencing significant psychological distress and functional decline secondary to a targeted cyber-harassment and defamation incident. The clinical picture is marked by heightened anxiety, depressive affect, fear of judgment, hypervigilance, sleep disturbance, appetite changes, panic symptoms, and impairment in occupational and interpersonal functioning. Her symptoms meet criteria for a trauma- and stressor-related condition, predominantly consistent with Adjustment Disorder. Continued therapeutic intervention is warranted to address emotional regulation, cognitive distortions, trauma responses, and restoration of functioning.



Treatment Plan

1. Symptom Reduction

- Utilize Cognitive Behavioral Therapy (CBT) to address maladaptive thoughts, rumination, and hypervigilance related to perceived negative evaluation and ongoing legal stress.
- Incorporate grounding strategies and coping skills to manage panic episodes and intrusive thoughts.

2. Trauma-Informed Interventions

- Explore and process the traumatic impact of the defamation incident using trauma-focused modalities as appropriate (e.g., narrative exposure, ACT-based acceptance strategies, or EMDR referral if indicated).
- Support client in developing a coherent narrative of the incident that reduces emotional intensity.

3. Sleep and Somatic Regulation

- Implement sleep hygiene strategies and relaxation techniques to reduce night-time rumination and panic-related awakenings.
- Introduce breathing exercises, progressive muscle relaxation, or mindfulness-based approaches to regulate somatic anxiety.

4. Behavioral Activation & Routine Restoration

- Gradual reintroduction of previously enjoyed activities to reduce withdrawal and anhedonia.
- Structure small, achievable tasks to rebuild a sense of competency and reduce burnout.

5. Support for Occupational Functioning

- Develop strategies to reduce over checking behaviors, including task chunking, time-limited work periods, and cognitive reframing related to fear of mistakes.
- Address perfectionism and fear of judgment in professional environments.

6. Strengthening Social Support

- Encourage selective, appropriate communication with family to reduce isolation and emotional burden.
- Explore ways to restore relational functioning with husband.



7. Caregiver Role Support

- Assist client in reorganizing time and emotional energy to allow gradual re-engagement with caregiving responsibilities to her mother and aunt.

8. Optional Referrals

- Psychiatric follow-up as needed for ongoing medication management.
- Legal counseling support if client desires external resources for coping with defamation-related stress.

Please note that there is no evidence to suggest malingering or symptom exaggeration. The client's presentation, history, and assessment results are consistent with genuine psychological distress.

Completed 11/07/2025

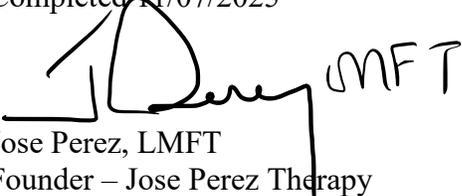
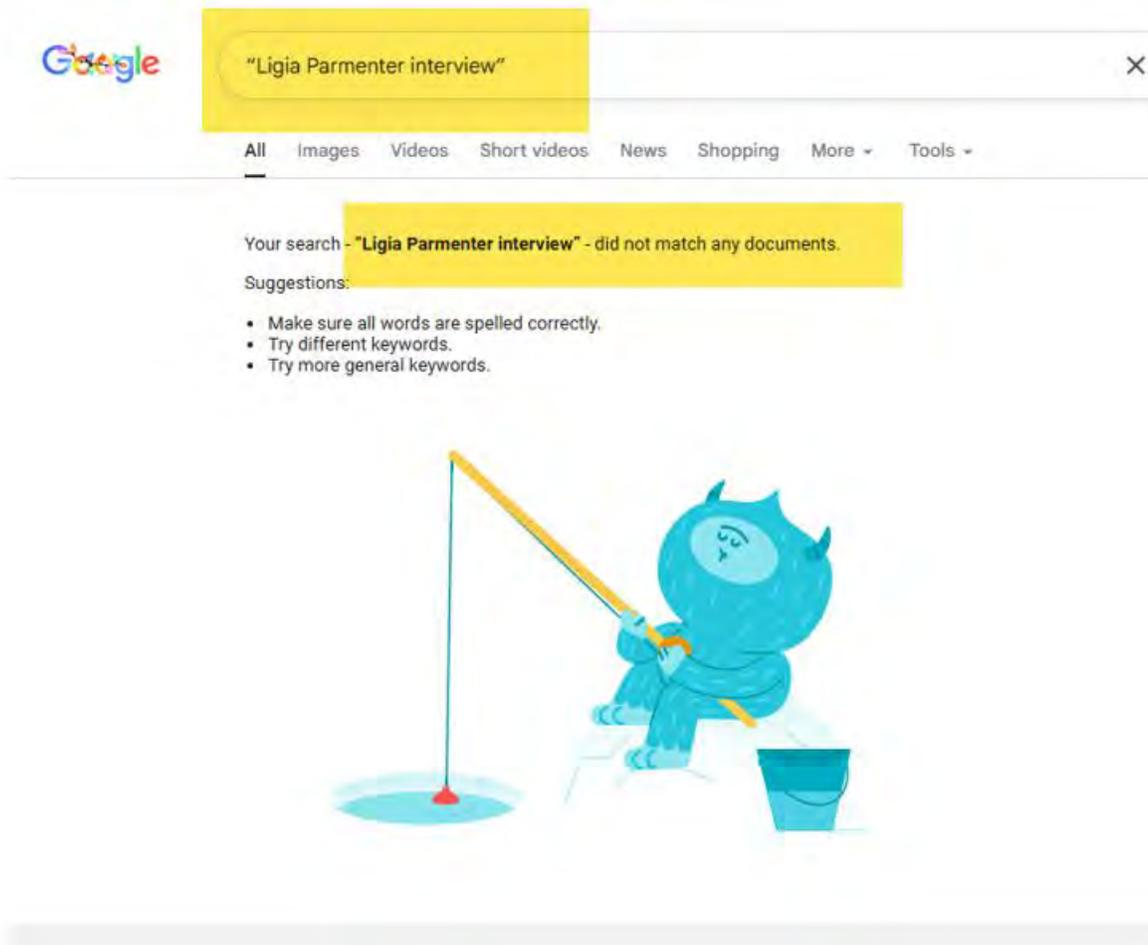
 LMFT
Jose Perez, LMFT
Founder – Jose Perez Therapy

EXHIBIT 7-A

EXHIBIT 7-A

True and correct screenshot of a Google search for “Ligia Parmenter interview” showing zero results, submitted to confirm Plaintiff is not a public figure and has no media or interview presence.



No public-figure panel exists for “Ligia Parmenter interview,” confirming her private-individual status.

** Highlighting (if any) added for the Court’s convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

Description:	True and correct screenshot of a Google search for “Ligia Parmenter interview” showing zero results, submitted to confirm Plaintiff is not a public figure and has no media or interview presence.
Source / URL:	“Ligia Parmenter interview”
Captured by:	Captured using Snagit (TechSmith) — Software v2024.1.2. by Ligia M. Parmenter;
Date Captured:	December 26, 2025 at 2:37 p.m. PST
True and Correct Copy:	Yes — authenticated in declaration.

“Ligia Parmenter interview”- Google Search

https://www.google.com/search?q=%E2%80%9CLigia+Parmenter+interview%E2%80%9D&oq=%E2%80%9CLigia+Parmenter+interview%E2%80%9D&gs_lcrp=EgRlZGdlKgYIABBFgDkyBggAEEUYOTIHCAEQABjvBTIKCAIQABiiBBiJBTIKCAMQABiABBiiBDIKCAQQABiABBiiBDIHCAUQABjvBdIBCDg2MzBqMGoxqAIAAsAIB&sourceid=chrome&ie=UTF-8

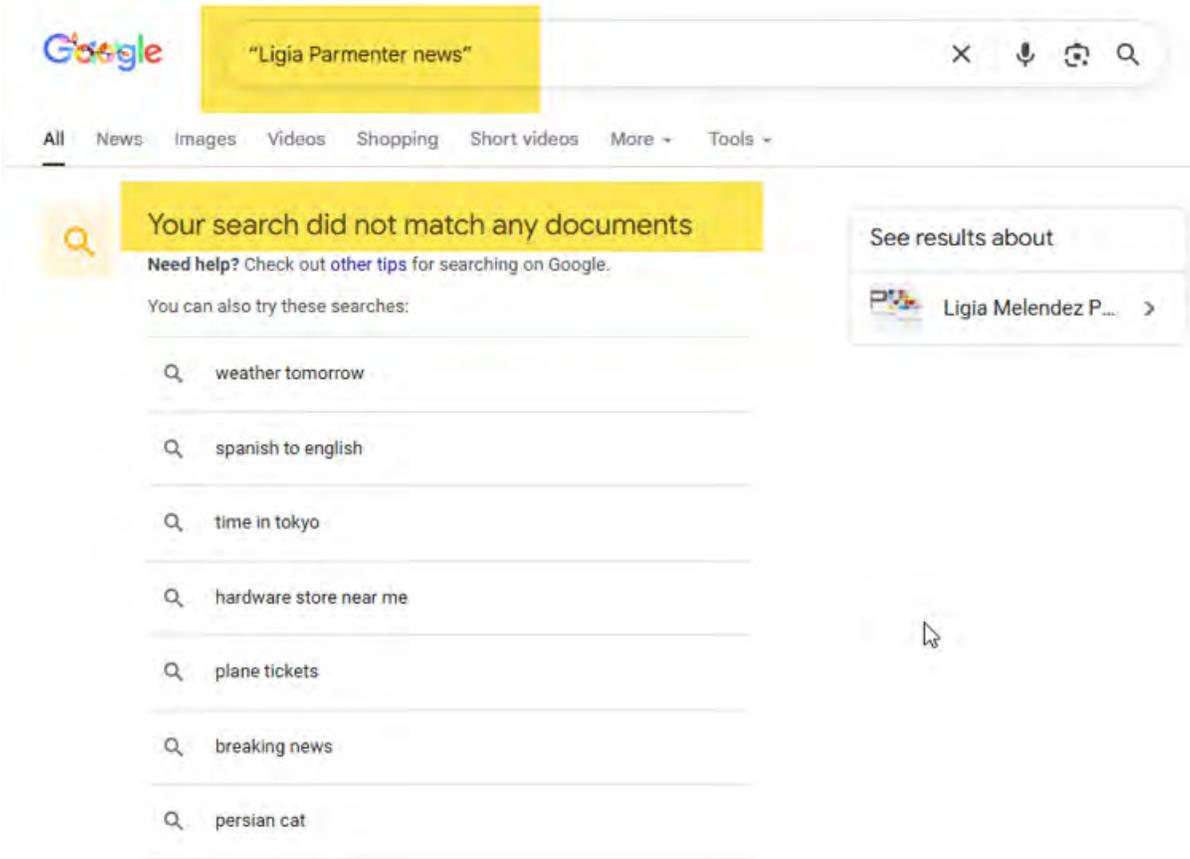
****NOTICE:** Search-engine URLs (Google, Bing, Yahoo, DuckDuckGo, etc.) are dynamically generated, non-static links that frequently change based on indexing, algorithm updates, geolocation, personalization, and search-engine rotation. If copied and pasted at a later time, these URLs will likely not open the same content or may fail to open at all. Accordingly, reliance should be made on the authenticated screenshot exhibits included herein as the accurate representation of the content as it appeared on the date and time of capture.

** Highlighting (if any) added for the Court’s convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

EXHIBIT 7-B

EXHIBIT 7-B

True and correct screenshot of a Google search for “Ligia Parmenter news” showing zero results, submitted to confirm Plaintiff has no press coverage and is not a public figure.



No public-figure panel exists for “Ligia Parmenter news” confirming her private-individual status.

** Highlighting (if any) added for the Court’s convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

Description:	True and correct screenshot of a Google search for “Ligia Parmenter news” showing zero results, submitted to confirm Plaintiff has no press coverage and is not a public figure.
Source / URL:	“Ligia Parmenter news”
Captured by:	Captured using Snagit (TechSmith) — Software v2024.1.2. by Ligia M. Parmenter;
Date Captured:	December 26, 2025 at 5:07 p.m. PST
True and Correct Copy:	Yes — authenticated in declaration.

“Ligia Parmenter news” - Google Search

https://www.google.com/search?q=%E2%80%9CLigia+Parmenter+news%E2%80%9D&oq=%E2%80%9CLigia+Parmenter+news%E2%80%9D&gs_lcrp=EgRIZGdlKgYIABBFgDkyBggAEEUYOTIHCAEQABjvBTIHCAIQABjvBTIHCAQQABjvBTIKCAUQABiABBiiBNIBCDEwNTFqMGoxqAIAAsAIB&

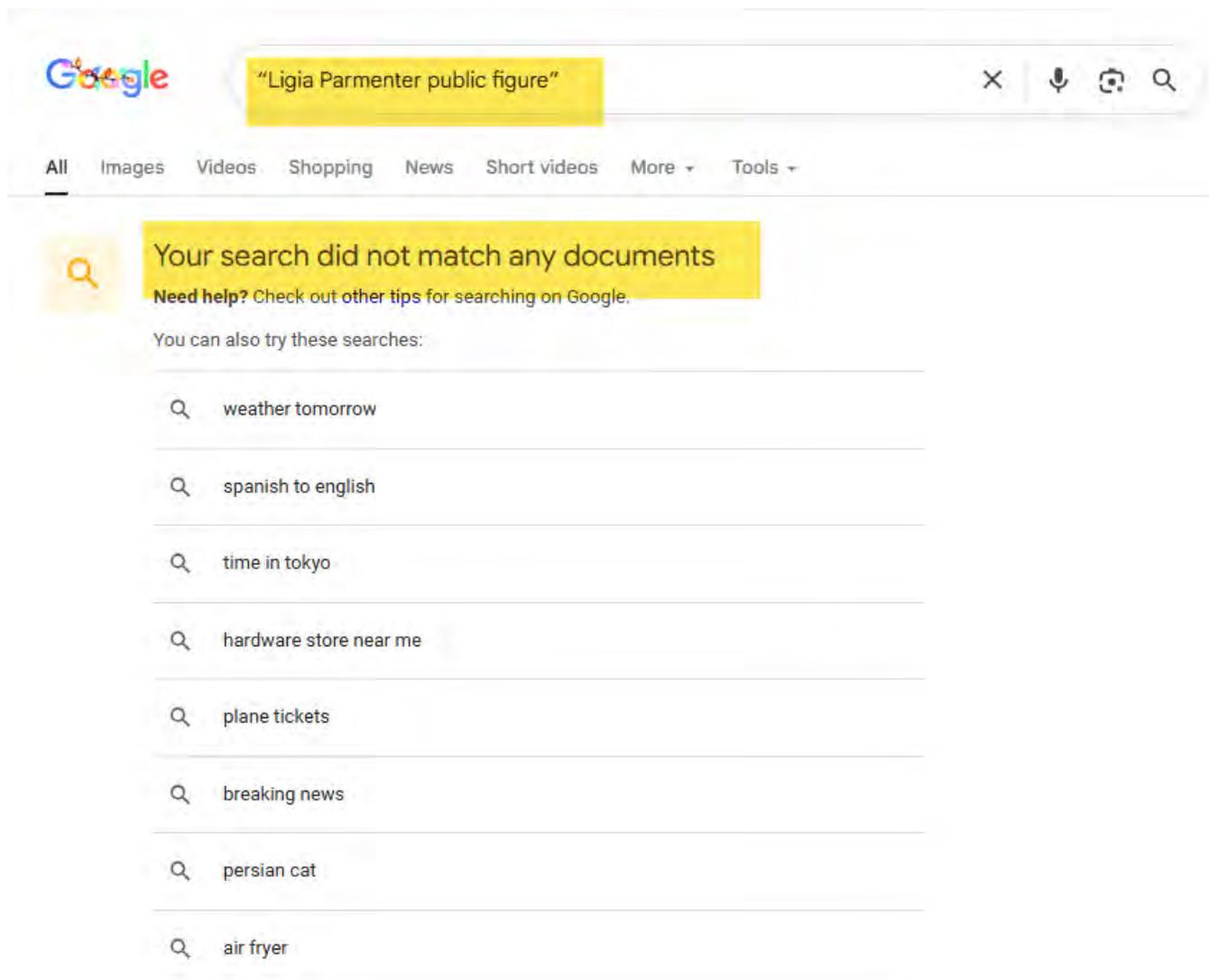
****NOTICE:** Search-engine URLs (Google, Bing, Yahoo, DuckDuckGo, etc.) are dynamically generated, non-static links that frequently change based on indexing, algorithm updates, geolocation, personalization, and search-engine rotation. If copied and pasted at a later time, these URLs will likely not open the same content or may fail to open at all. Accordingly, reliance should be made on the authenticated screenshot exhibits included herein as the accurate representation of the content as it appeared on the date and time of capture.

** Highlighting (if any) added for the Court’s convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

EXHIBIT 7-C

EXHIBIT 7-C

True and correct screenshot of a Google search for “Ligia Parmenter public figure” showing zero results, submitted to confirm Plaintiff is not recognized as a public figure.



No public-figure panel exists for “Ligia Parmenter public figure” confirming her private-individual status.

** Highlighting (if any) added for the Court’s convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

Description:	True and correct screenshot of a Google search for “Ligia Parmenter public figure” showing zero results, submitted to confirm Plaintiff is not recognized as a public figure.
Source / URL:	“Ligia Parmenter public figure”
Captured by:	Captured using Snagit (TechSmith) — Software v2024.1.2. by Ligia M. Parmenter;
Date Captured:	December 26, 2025 at 5:11 p.m. PST
True and Correct Copy:	Yes — authenticated in declaration.

“Ligia Parmenter public figure”- Google Search

https://www.google.com/search?q=%E2%80%9CLigia+Parmenter+public+figure%E2%80%9D&sca_esv=4cc6e4aa7938dd7f&ei=qzBPacyNGfKQwbkP_YaroQk&ved=0ahUKEwiMj47DydyRAxVySDABHX3DKpQQ4dUDCBE&uact=5&oq=%E2%80%9CLigia+Parmenter+public+figure%E2%80%9D&gs_lp=Egxnd3Mtd2l6LXNlcnAiI-KAnExpZ2lhIFBhcm1lbnRlciBwdWJsaWMgZmlndXJl4oCdMgUQIRigATIFECEYoAEyBRAhGKABMgUQIRigATIFECEYqWJI5BNQAFi6DHABeACQAQCYAd4GoAHeBqoBAzYtMbgBA8gBAPgBAfgBAPgCAqAC7waoAgrCAhAQABgDGLQCGOoCGI8B2AEBmAMH8QWh9UG89D6GNLoGBAgBGAqSBwUxLjYtMaAH4ASyBwM2LTG4B-gGwgcDMi0yyAcIgAgA&sclient=gws-wiz-serp

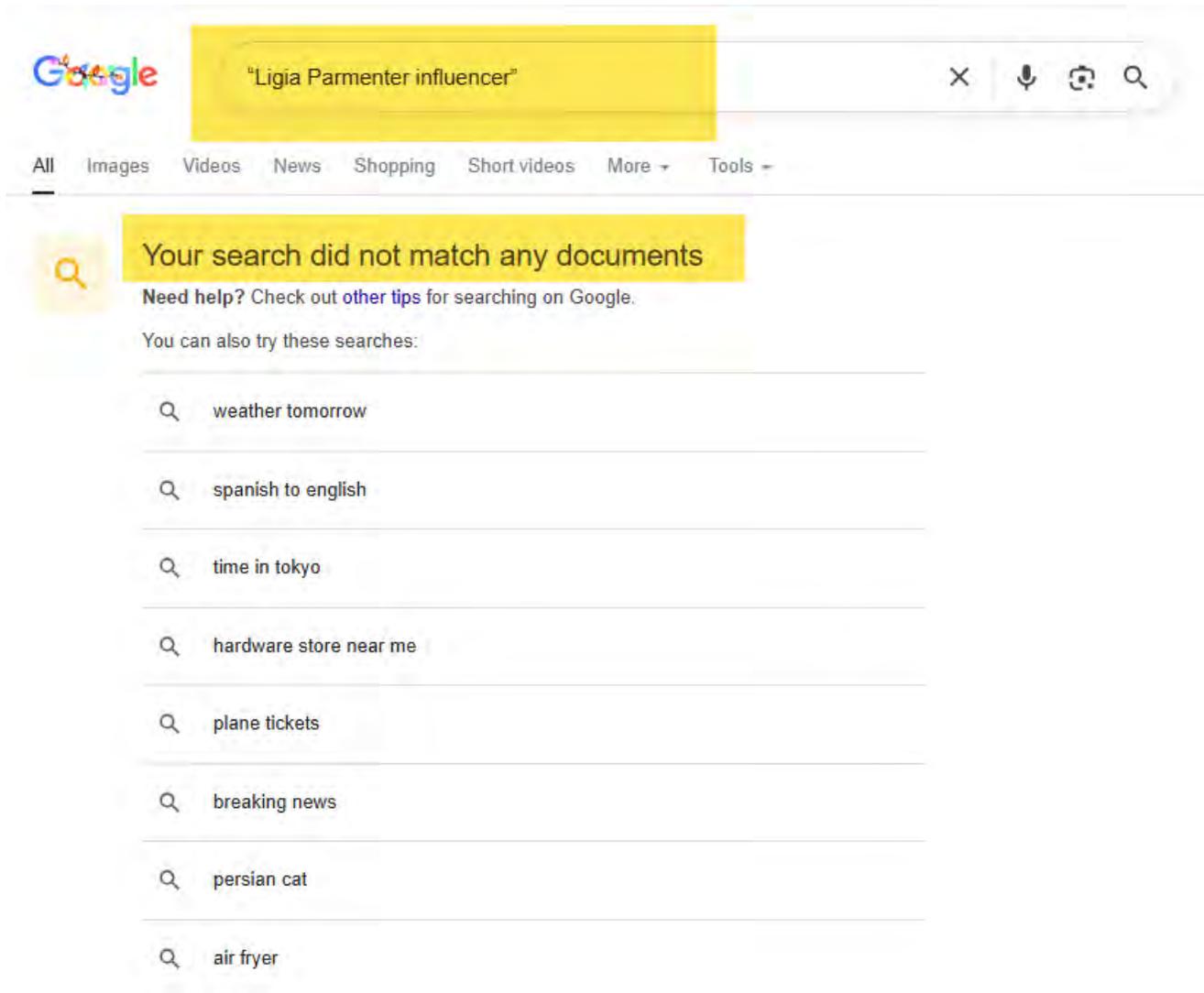
****NOTICE:** Search-engine URLs (Google, Bing, Yahoo, DuckDuckGo, etc.) are dynamically generated, non-static links that frequently change based on indexing, algorithm updates, geolocation, personalization, and search-engine rotation. If copied and pasted at a later time, these URLs will likely not open the same content or may fail to open at all. Accordingly, reliance should be made on the authenticated screenshot exhibits included herein as the accurate representation of the content as it appeared on the date and time of capture.

** Highlighting (if any) added for the Court’s convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

EXHIBIT 7-D

EXHIBIT 7-D

True and correct screenshot of a Google search for “Ligia Parmenter influencer” showing zero results, submitted to confirm Plaintiff is not an influencer or public figure.



No public-figure panel exists for “Ligia Parmenter influencer” confirming her private-individual status.

** Highlighting (if any) added for the Court’s convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

Description:	True and correct screenshot of a Google search for “Ligia Parmenter influencer” showing zero results, submitted to confirm Plaintiff is not an influencer or public figure.
Source / URL:	“Ligia Parmenter influencer”
Captured by:	Captured using Snagit (TechSmith) — Software v2024.1.2. by Ligia M. Parmenter;
Date Captured:	December 26, 2025 at 5:31 p.m. PST
True and Correct Copy:	Yes — authenticated in declaration.

“Ligia Parmenter influencer”- Google Search

https://www.google.com/search?q=%E2%80%9CLigia+Parmenter+influencer%E2%80%9D&oq=%E2%80%9CLigia+Parmenter+influencer%E2%80%9D&gs_lcrp=EgRIZGdlKgYIABBFgDkyBggAEEUYOTIKCAEQABiABBiiBDIKCAIQABiABBiiBDIHCAUQABjvBTIKCAQQABiABBiiBDIHCAUQABjvBdIBCDEzNTVqMGo0qAIAAsAIB&sourceid=chrome&ie=UTF-8

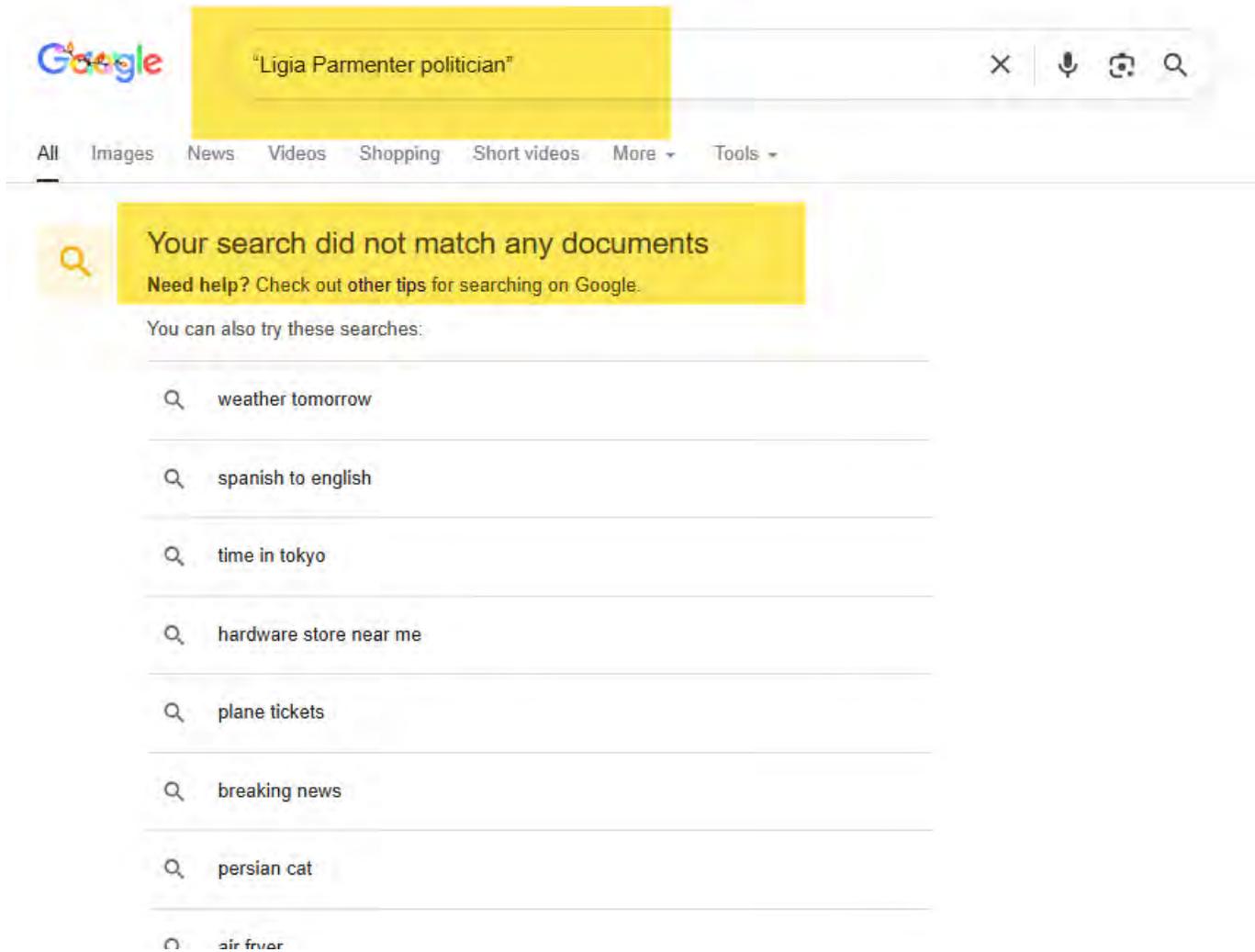
****NOTICE:** Search-engine URLs (Google, Bing, Yahoo, DuckDuckGo, etc.) are dynamically generated, non-static links that frequently change based on indexing, algorithm updates, geolocation, personalization, and search-engine rotation. If copied and pasted at a later time, these URLs will likely not open the same content or may fail to open at all. Accordingly, reliance should be made on the authenticated screenshot exhibits included herein as the accurate representation of the content as it appeared on the date and time of capture.

** Highlighting (if any) added for the Court’s convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

EXHIBIT 7-E

EXHIBIT 7-E

True and correct screenshot of a Google search for “Ligia Parmenter politician” showing zero results, submitted to confirm Plaintiff has no political role and is not a public figure.



No public-figure panel exists for “Ligia Parmenter politician”, confirming her private-individual status.

** Highlighting (if any) added for the Court’s convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

Description:	True and correct screenshot of a Google search for “Ligia Parmenter politician” showing zero results, submitted to confirm Plaintiff has no political role and is not a public figure.
Source / URL:	“Ligia Parmenter politician”
Captured by:	Captured using Snagit (TechSmith) — Software v2024.1.2. by Ligia M. Parmenter;
Date Captured:	December 26, 2025 at 5:27 p.m. PST
True and Correct Copy:	Yes — authenticated in declaration.

“Ligia Parmenter politician” - Google Search

https://www.google.com/search?q=%E2%80%9CLigia+Parmenter+politician%E2%80%9D&oq=%E2%80%9CLigia+Parmenter+politician%E2%80%9D&gs_lcrp=EgRIZGdIKgYIABBFgDkyBggAEEUYOTIHCAEQABjvBTIHCAIQABjvBTIKCAMQABiABBiiBDIHCAQQABjvBTIKCAUQABiABBiiBNIBBzk5OGowajGoAgCwAgA&sourceid=chrome&ie=UTF-8

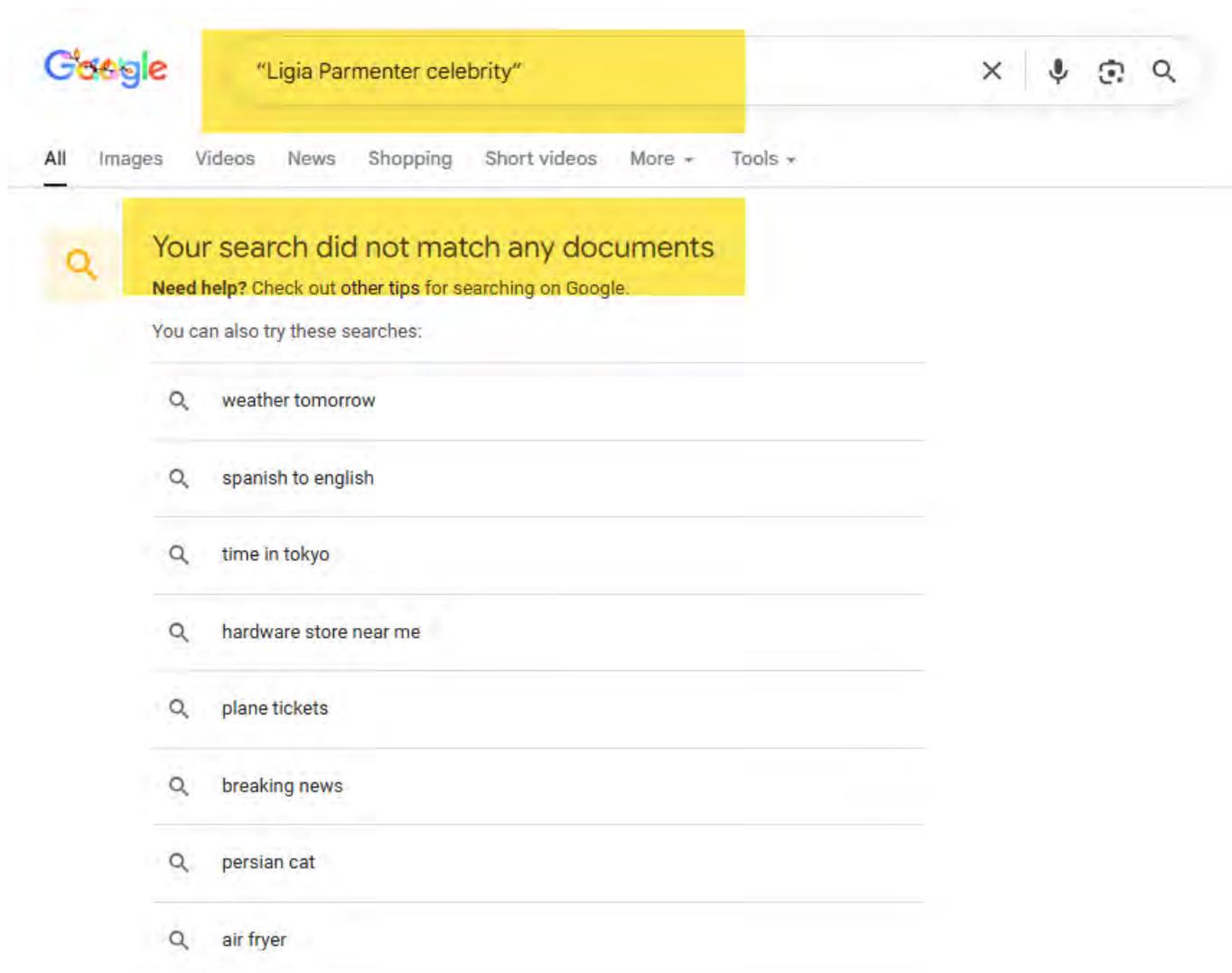
****NOTICE:** Search-engine URLs (Google, Bing, Yahoo, DuckDuckGo, etc.) are dynamically generated, non-static links that frequently change based on indexing, algorithm updates, geolocation, personalization, and search-engine rotation. If copied and pasted at a later time, these URLs will likely not open the same content or may fail to open at all. Accordingly, reliance should be made on the authenticated screenshot exhibits included herein as the accurate representation of the content as it appeared on the date and time of capture.

** Highlighting (if any) added for the Court’s convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

EXHIBIT 7-F

EXHIBIT 7-F

True and correct screenshot of a Google search for “Ligia Parmenter celebrity” showing zero results, submitted to confirm Plaintiff is not a celebrity or public figure.



No public-figure panel exists for “Ligia Parmenter celebrity,” confirming her private-individual status.

** Highlighting (if any) added for the Court’s convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

Description:	True and correct screenshot of a Google search for “Ligia Parmenter celebrity” showing zero results, submitted to confirm Plaintiff is not a celebrity or public figure.
Source / URL:	“Ligia Parmenter celebrity”
Captured by:	Captured using Snagit (TechSmith) — Software v2024.1.2. by Ligia M. Parmenter;
Date Captured:	December 26, 2025 at 5:37p.m. PST
True and Correct Copy:	Yes — authenticated in declaration.

“Ligia Parmenter celebrity”- Google Search

https://www.google.com/search?q=%E2%80%9CLigia+Parmenter+celebrity%E2%80%9D&oq=%E2%80%9CLigia+Parmenter+celebrity%E2%80%9D&gs_lcrp=EgRIZGdlKgYIABBFgdKyBggAEEUYOdIBCDEyMDJqMGo0qAIAsAIB&sourceid=chrome&ie=UTF-8

****NOTICE:** Search-engine URLs (Google, Bing, Yahoo, DuckDuckGo, etc.) are dynamically generated, non-static links that frequently change based on indexing, algorithm updates, geolocation, personalization, and search-engine rotation. If copied and pasted at a later time, these URLs will likely not open the same content or may fail to open at all. Accordingly, reliance should be made on the authenticated screenshot exhibits included herein as the accurate representation of the content as it appeared on the date and time of capture.

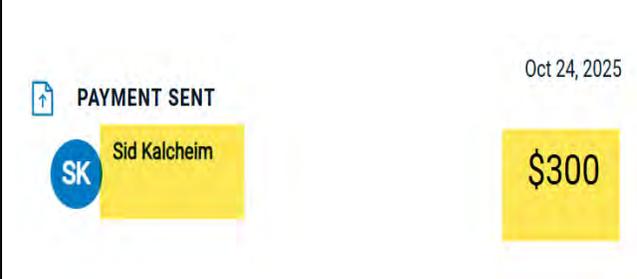
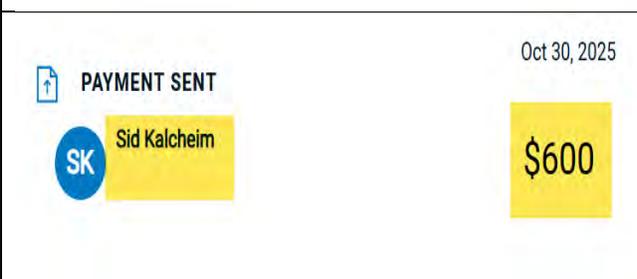
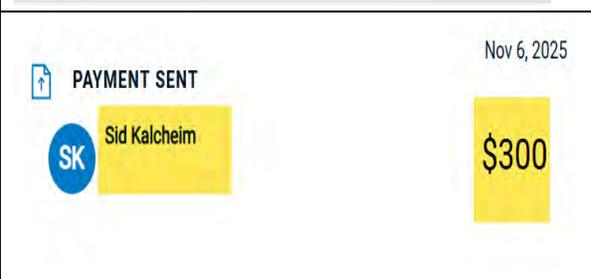
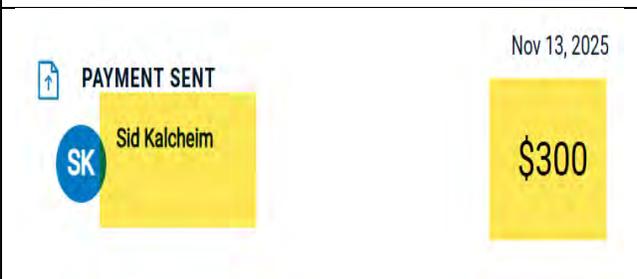
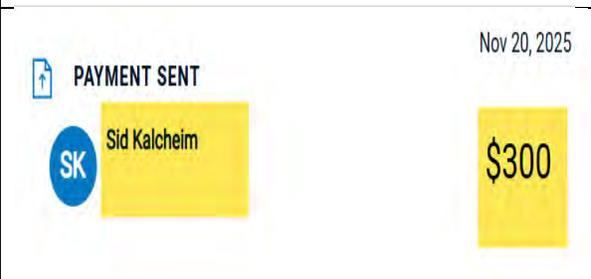
** Highlighting (if any) added for the Court’s convenience only; the underlying screenshot is a true and correct copy and has not been altered in substance.*

EXHIBIT 8-A

EXHIBIT 8-A

ZELLE PAYMENT RECORD CAPTURES — THERAPEUTIC CARE PROVIDED BY DR. SID KALCHEIM

Economic Damages Incurred Solely to Treat Situational Emotional Injury, Panic Attacks, and Acute Psychological Distress Directly Caused by Defendant Andrew Watters' Defamatory and Threat-Driven Cyber-Harassment

 <p>PAYMENT SENT Aug 28, 2025 SK Sid Kalcheim \$300</p>	 <p>PAYMENT SENT Oct 16, 2025 SK Sid Kalcheim \$300</p>
 <p>PAYMENT SENT Oct 24, 2025 SK Sid Kalcheim \$300</p>	 <p>PAYMENT SENT Oct 30, 2025 SK Sid Kalcheim \$400</p>
 <p>PAYMENT SENT Oct 30, 2025 SK Sid Kalcheim \$600</p>	 <p>PAYMENT SENT Nov 6, 2025 SK Sid Kalcheim \$300</p>
 <p>PAYMENT SENT Nov 13, 2025 SK Sid Kalcheim \$300</p>	 <p>PAYMENT SENT Nov 20, 2025 SK Sid Kalcheim \$300</p>

PROOF OF SERVICE — CIVIL
[Code of Civ. Proc. §§ 1011, 1013, 1031a, 2015.5]

I, C. MELENDEZ, am not a party to this action, I am over 18 years of age. My business address is 501 ‘B’ Street, Ste. 200, San Rafael, CA 94901. I declare under penalty of perjury that on the below-indicated date, I served the foregoing document(s) described as:

DECLARATION AND COMPENDIUM OF EVIDENCE OF PLAINTIFF LIGIA PARMENTER, ESQ. IN OPPOSITION TO SPECIAL MOTION TO STRIKE (CCP § 425.16):

1. **Defamation / Libel**
2. **Electronic Cyber-Harassment — Cal. Penal Code § 653.2(a)-(c)(1)-(2)**
3. **Electronic Cyber-Stalking — Cal. Penal Code § 646.9(a);(e)-(h)**
4. **Extortionate Threats — Cal. Penal Code §§ 518, 519, 523(a)**
5. **Commercial Speech Exemption — Cal. Civ. Code § 425.17(c)**

on the interested parties in this action as follows:

Mr. Jeramy Stone, Esquire-
555 Twin Dolphin Drive, Ste, 135 Redwood City, CA 94065 (415) 340-0762
JERAMY@WATTERS.LAW
JERAMY@ANDREWATTERS.COM

METHOD OF SERVICE:

<input checked="" type="checkbox"/>	VIA ELECTRONIC FILING SERVICE: By causing One Legal to effect e-service at the time the subject document(s) were submitted for filing with the Court using the email address for each recipient that is on file with One Legal for each party served, as per the “Order Receipt” from One Legal. Or in the alternative, in complying with Code of Civil Procedure §1010.6, I caused such document(s) to be electronically served through the One Legal system for the above-entitled case to those parties listed above or on the attached service list, maintained on its website for this case. The file transmission was reported as complete, and a copy of the Filing/Service Receipt will be maintained with the original document(s) in our office.
-------------------------------------	---

Executed in San Rafael, California on **JANUARY 23, 2026**

C. Melendez
C. Melendez