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7 In Pro Per

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF SAN MATEO
10

11
12 MAHSA PARVIS,

13 Petitioner,

14 vs.

15 ANDREW GEORGE WATTERS,

16 Respondent.

Case No.: 26FAM01592

DECLARATION OF ANDREW GEORGE
WATTERS IN SUPPORT OF EX PARTE
APPLICATION TO RECALL AND
DISSOLVE TEMPORARY RESTRAINING
ORDER

1 I, Andrew G. Watters, declare as follows:

- 2
3 1. I am the Respondent in this action. I am over the age of eighteen and have personal
4 knowledge of the matters stated herein. If called as a witness, I could and would testify
5 competently thereto.
- 6
7 2. I am an attorney licensed to practice law in the State of California. I currently reside in
8 California and maintain my law office in Redwood City.
- 9
10 3. I submit this declaration in support of my Ex Parte Application requesting that the
11 Temporary Restraining Order entered on August 4, 2026, be recalled and dissolved
12 because the allegations supporting the order are false, unsupported by evidence, and omit
13 material facts that are necessary for the Court to fairly evaluate Petitioner's application.
- 14
15 4. Petitioner and I briefly dated for approximately one month during April and May of
16 2021. We never married, never became engaged, never lived together, and never had
17 children together.
- 18
19 5. During our brief relationship, Petitioner represented herself as a Harvard-trained
20 M.D./Ph.D. physician who had recently relocated to the Bay Area. I later learned those
21 representations were false.
- 22
23 6. During the relationship, Petitioner also exhibited increasingly erratic and concerning
24 behavior centered around her attempts to regain custody of her daughter after the
25 termination of her parental rights.
- 26
27 7. Because of Petitioner's behavior and numerous misrepresentations, I ended the
28 relationship in May 2021. The relationship has never resumed.

- 1 8. In June 2021, Petitioner was arrested on Federal charges for conduct that pre-dated the
2 relationship. In December 2021, Petitioner was convicted and spent the next several years
3 in prison. **RJN Exh. 8 and 9.**
- 4 9. In contrast to Petitioner's petition, Respondent never acted as Petitioner's attorney in any
5 capacity. During the relationship, Respondent helped Petitioner with minor legal matters
6 as her boyfriend. This issue was also previously resolved in Respondent's favor by the
7 State Bar, a fact Petitioner failed to mention in her petition.
- 8 10. Since our relationship ended in May 2021, I have had no personal interaction with
9 Petitioner.
- 10 11. I have not attempted to reconcile with Petitioner. I have absolutely no desire to resume
11 any relationship or communication with Petitioner.
- 12 12. I have been happily married since early 2022. My wife and I now have two children. My
13 personal and family life has moved on entirely from the very brief relationship that ended
14 more than five years ago.
- 15 13. Petitioner's principal allegation concerns an Apple "Find My" notification dated July 30,
16 2026.
- 17 14. I have never had access to Petitioner's iCloud account, nor have I attempted to gain
18 access in any way. I have never logged into any Apple account belonging to Petitioner.
- 19 15. I have never attempted to determine Petitioner's location through Apple or any other
20 electronic service. I have absolutely no interest in monitoring Petitioner's whereabouts.
- 21 16. The notification attached to Petitioner's application does not identify me, does not
22 identify my account, does not identify my devices, and does not establish that I have
23 access to her account or location.
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1 17. Petitioner also alleges that I retaliated against her by publishing or republishing sexually
2 explicit or defamatory material on July 27, 2026. That allegation is false.

3 18. I have never possessed any sexually explicit videos of Petitioner.

4 19. During our relationship in 2021, Petitioner recorded an intimate video on her own phone.
5 That device was later seized by the federal government during Petitioner's criminal
6 prosecution.

7 20. I have never possessed that recording. I have never threatened to release any intimate
8 recording. Petitioner's allegations regarding revenge pornography are completely false.

9 21. In 2023, Petitioner previously filed a domestic violence action against me in San Mateo
10 County. No restraining order was entered against me and the proceeding was ultimately
11 dismissed.

12 22. The present action concerns substantially the same historical events. Petitioner simply
13 changed the spelling of her name in order to deceive the court into allowing the filing of
14 this frivolous petition.

15 23. Petitioner's request seeks protection not only for herself but also for members of her
16 family. I have never met Petitioner's mother or father.

17 24. I have never threatened, followed, or attempted to contact them except to respond
18 appropriately to communications they initiated.

19 25. I have never met Petitioner's alleged husband. I have never contacted or threatened him.

20 26. I have never contacted Petitioner's daughter, nor have I attempted to locate Petitioner's
21 daughter.

22 27. Petitioner alleges that I possessed or displayed a Smith & Wesson revolver during our
23 relationship. That allegation is false.

1 28. I never displayed firearms to Petitioner during our brief relationship.

2 29. Although I lawfully own firearms as a shooting sports enthusiast and possess a California
3 concealed carry permit, I have always exercised responsible firearm ownership. I would
4 never permit an individual whom I believed to be emotionally unstable to handle
5 firearms.
6

7 30. The temporary restraining order requires me to surrender my lawfully owned firearms
8 and affects my concealed carry permit despite the complete lack of evidence connecting
9 me to any recent act of abuse or even contact with Petitioner.
10

11 31. There has been no direct contact between Petitioner and me for approximately five years.

12 32. The temporary restraining order places me into the CLETS system and it subjects me to
13 possible criminal penalties for any alleged violation.

14 33. It requires me to surrender lawfully owned firearms and affects my concealed carry
15 permit. It imposes substantial personal, constitutional, reputational, and professional
16 burdens.
17

18 34. I respectfully request that the Court dissolve the Temporary Restraining Order because
19 Petitioner's allegations are unsupported by competent evidence, omit material facts, and
20 are inconsistent with the parties' actual history.
21

22 I declare under penalty of perjury under the laws of the State of California that the foregoing is
23 true and correct and that this Declaration was executed on August 7, 2026, in Redwood City,
24 CA.
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26 *Andrew G. Watters*
27 Andrew G. Watters
28 In Pro Per