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DARIUS ANDERSON

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SONOMA

DARIUS ANDERSON,

Petitioner,

v.

ADINA FLORES,

Respondent.

Case No.

**DECLARATION OF DARIUS
ANDERSON IN SUPPORT OF
REQUEST FOR CIVIL
HARASSMENT RESTRAINING
ORDERS**

Date:
Time:
Judge:
Dept:

I, DARIUS ANDERSON, declare:

1. I am the Petitioner in this action. I have personal knowledge as to the facts of this case and where indicated allege them on information and belief, and if asked, can testify competently to the matters set forth herein.

2. I am a partial owner of the Press Democrat newspaper, the Sonoma Index Tribune and several other public facing businesses in Sonoma County and elsewhere in California.

3. I am personally familiar with Adina Flores. Ms. Flores is social activist and self-described "investigative journalist." Ms. Flores is a regular fixture

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1 at various public business meetings and meetings of local government including
2 meetings of the Sonoma County Board of Supervisors. Her antics and those of her
3 romantic partner Shelby Alan Dodson Pryor, have been featured in local news
4 media, including the Press Democrat. Dodson is currently the subject of a
5 workplace violence restraining order filed by the County of Sonoma on behalf of
6 Supervisor James Gore and his family, whom Dodson publicly threatened. (See
7 Sonoma Co. Court Case # SCV-270641.)

8 4. Ms. Flores is also known for her extensive public records requests and
9 complaints made to the California Fair Political Practices Commission. Ms. Flores
10 has made numerous requests for information and complaints about me, and my
11 business activities. Her most recent complaint was filed on October 16, 2024.

12 5. I believe that these requests for information and complaints serve no
13 legitimate purpose, and are made to damage my reputation and to harass me
14 personally.

15 6. Ms. Flores has recently escalated her harassment by making public
16 threats against me and my family.

17 7. On October 30, 2024, in a public video posted to the social media site
18 TikTok, Ms. Flores names me personally, and identifies me as the as owner of the
19 Press Democrat and goes on to say that she will ruin the lives of Press Democrat
20 Reporters, their spouses, and their "mother f**king kids."

21 8. In the same video, Ms. Flores mentions my recent attendance at a
22 fundraiser held by Governor Gavin Newsom at his personal residence. This was a
23 private event. I am deeply disturbed that Ms. Flores is able to somehow track my
24 whereabouts without my consent.

25 9. In the same video, Ms. Flores identifies another business I am
26 associated with and reiterates a threat to ruin the lives of the "spouses and mother
27 f**king kids" of those whom she has deemed to be her enemy, including me. This
28 video was shared publicly with Ms. Flores 4500 or so followers.

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10. I do not personally use TikTok, but my 14-year-old son is a TikTok user and after seeing the video, he is terrified that Ms. Flores will make good on her public threats to ruin our lives.

11. Ms. Flores has clearly gathered extensive information about me, the businesses I work at and the private activities I attend, I am deeply concerned about the amount of private information she has gained about me and my family. She does not make it clear how she intends to "ruin the lives" of those she targets but I fear she may mean to do so by way of violence, or further escalation of harassment.

12. Ms. Flores' unusually specific knowledge of my activities and whereabouts, combined with the belligerent tone used in her most recent video and the specific threat to ruin the lives of my spouse and of "mother f**cking kids" have made my family feel that we are in immediate danger.

13. Since the recent video was posted, I fear for my safety as well as my family's safety, especially because I believe Ms. Flores knows where I live. She clearly knows where I work. I respectfully request that this Court issue a restraining order requiring Ms. Flores to stay away from my person, my family, my residence, my vehicles, my child's school and from my places of business. Additionally, I request that Ms. Flores be required to not contact me or my family in person, by phone, electronically or by any other means.

I declare under penalty of perjury under the laws of California that the foregoing is true and correct. Executed on November 1, 2024.

Darius Anderson

DARIUS ANDERSON