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7 **MARICOPA COUNTY SUPERIOR COURT**

8 **STATE OF ARIZONA**

9 **LAURA OWENS,**

10 **Plaintiff,**

11 **v.**

12 **ROBERT ANDREJEV,**

13 **Defendant.**

Case No: CV2026-002304

RESPONSE TO MOTION TO QUASH

(Assigned to Hon. Lindsey Coates)

14
15 Plaintiff Laura Owens (“Ms. Owens”) respectfully submits the following response
16 to Defendant Robert Andrejev’s (“Mr. Andrejev”) Motion to Quash.

17 The issue for the Court is simple – does the First Amendment bestow an unlimited
18 right to attack, threaten, harass, and terrify victims with online speech? As explained below,
19 the answer is clear – **absolutely not**. Threats and harassment are not merely immoral acts.
20 They are crimes in the State of Arizona, and they are subject to lawful restraint.

21 Some odd context aside, this Court’s task is easy. The issues raised by this case have
22 already been conclusively resolved by the United States Supreme Court and Arizona
23 appellate courts. As these authorities explain, the right to engage in free speech is *never*
24 **without limits**. **Never**. That is particularly true in cases involving extreme, egregious, and
25 vicious online attacks from an obsessive, mentally unstable individual, as occurred here.

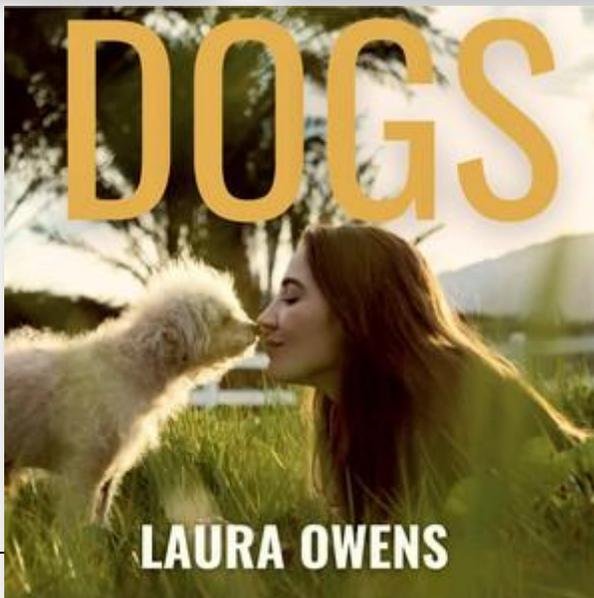
26 Accordingly, the Motion to Quash should be denied. Ms. Owens should also be
27 awarded her reasonable attorney’s fees and costs pursuant to A.R.S. § 12–1809(P) and Rule
28 39(a) of the Arizona Rules of Protective Order Procedure.

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I. INTRODUCTION

The facts of this case are disturbing and present a *textbook* example of why Arizona has strong anti-harassment and anti-stalking laws. Laura Owens is a 35-year old resident of Scottsdale. She currently lives at home with her parents where, among other things, she provides care for her elderly father, Ronn Owens. For 40 years, Mr. Owens was a nationally-recognized radio talk show host in the San Francisco Bay Area. Laura also rides horses and has published music including songs about her love for dogs.

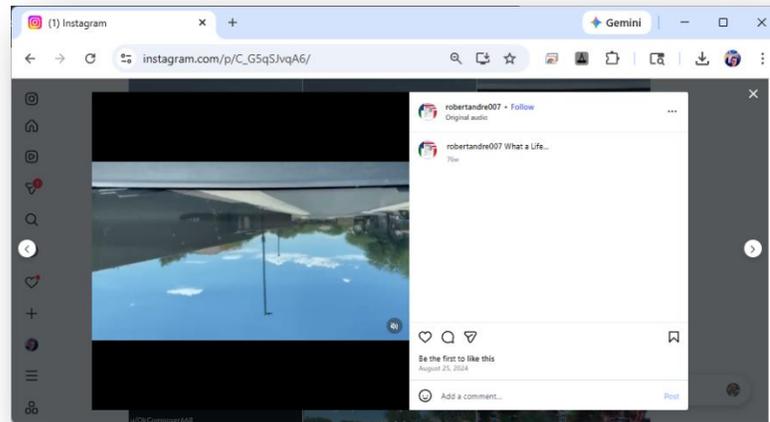
Laura Owens



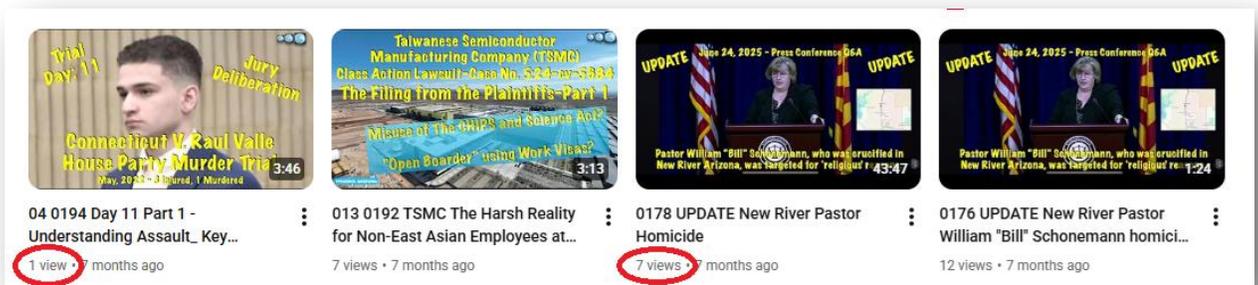
1 Defendant Robert Andrejev is a complete stranger to Ms. Owens; the two do not
2 know each other and have never interacted in any capacity. The only knowledge Ms.
3 Owens has regarding Mr. Andrejev is what appears in online searches and, of course, the
4 acts of harassment by Mr. Andrejev which give rise to this case.

5 Mr. Andrejev operates several social media pages including an Instagram account
6 (<https://www.instagram.com/robertandre007/>) and a small YouTube channel
7 (<https://www.youtube.com/@robertandre007>).

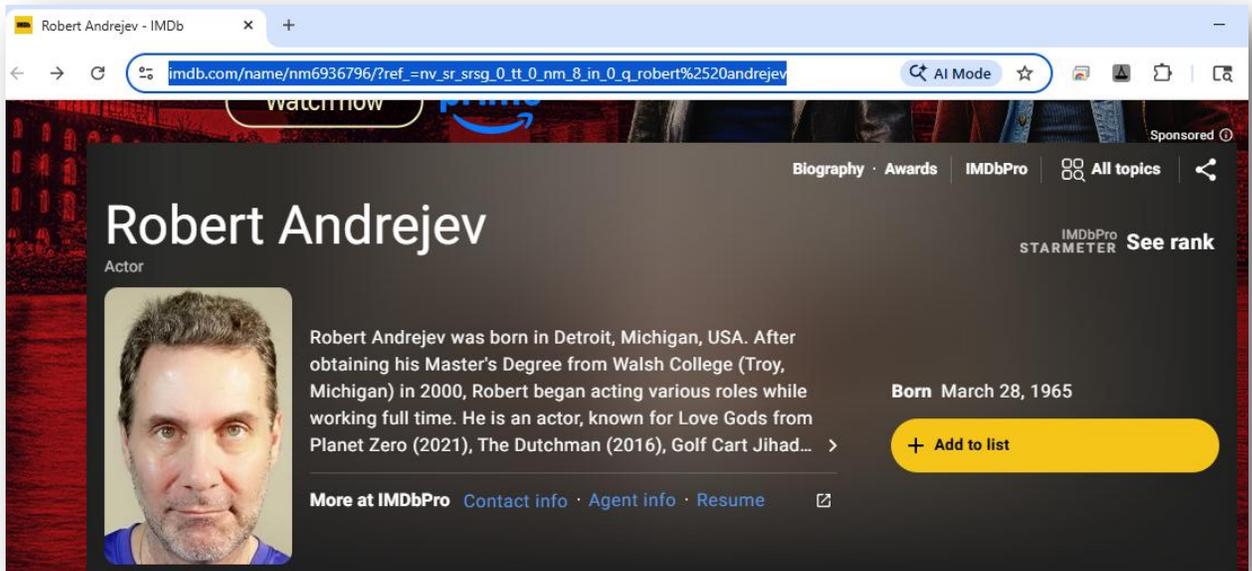
8 Much of the content posted online by Mr. Andrejev is nonsensical. For example, his
9 Instagram account contains a video dated August 25, 2024 which appears to show him
10 driving through an Arizona neighborhood, albeit with the camera *turned upside down*. See
11 https://www.instagram.com/p/C_G5qSJvqA6/. This video (and much of Mr. Andrejev's
12 other posts) contains no "likes" and no comments from others.



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20 Many of Mr. Andrejev's YouTube videos are similar, in that they reflect little to no
21 audience attention. Many videos have 10 views or less, some as few as a single view. While
22 not meant to disparage Mr. Andrejev's popularity (or lack thereof), it is clear he is *not* a
23 journalist speaking to a broad audience comparable to, say, the New York Times.



1 In addition to his limited social media fame, it appears Mr. Andrejev previously
2 worked as an actor on low budget films such as *Love Gods from Planet Zero* and *Golf Cart*
3 *Jihad*. See <https://www.imdb.com/name/nm6936796/>



14 Ms. Owens and Mr. Andrejev crossed paths at some point after late 2023, when
15 Ms. Owens filed a *pro se* paternity action against a man named Clayton Echard. In that
16 case, Ms. Owens alleged she became pregnant after a brief (one night) encounter with Mr.
17 Echard. This allegation, and the case *writ large*, eventually gained massive attention on
18 social media for two reasons: first, because Mr. Echard was a former star of the popular
19 reality TV dating show, *The Bachelor*.

20 **Clayton Echard**



1 The second reason the case drew so much attention is because Mr. Echard accused
2 Ms. Owens of fabricating her pregnancy. After a two-hour evidentiary hearing, the trial
3 judge largely agreed with Mr. Echard, and ordered Ms. Owens to pay nearly \$150,000 in
4 sanctions. The court also referred Ms. Owens to the Maricopa County Attorney’s Office
5 which later indicted her on several felony counts arising from the case including perjury
6 and forgery.

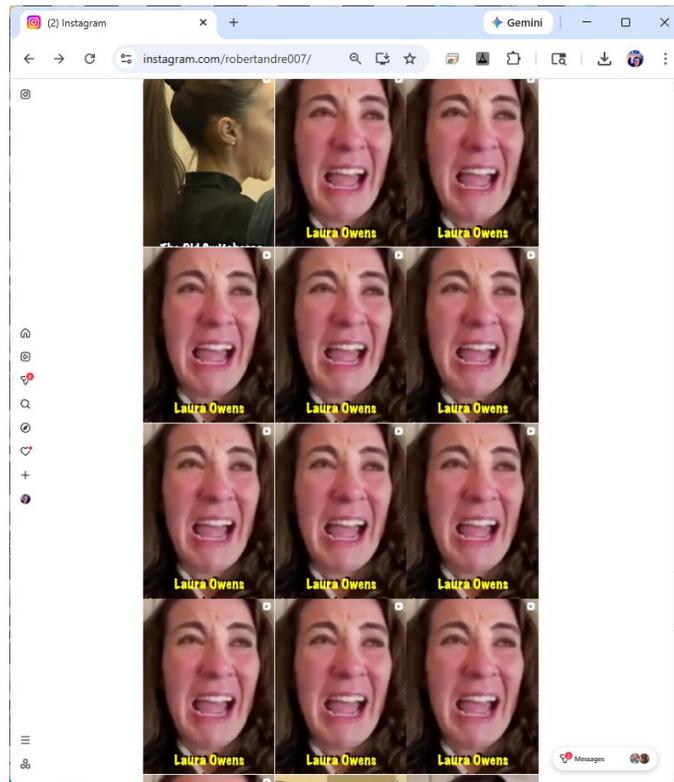
7 As of the date of this response, the criminal case remains pending. Ms. Owens has
8 pleaded not guilty, and she has not been convicted of any crime.

9 The sensational nature of these allegations, as well as Ms. Owens’ status as the
10 daughter of a former talk-radio “legend” has caused the case to receive significant online
11 attention. The story has generated headlines in major/traditional media outlets. *See*
12 [https://www.sfchronicle.com/entertainment/article/laura-owens-fraud-paternity-echard-](https://www.sfchronicle.com/entertainment/article/laura-owens-fraud-paternity-echard-20314350.php)
13 [20314350.php](https://www.sfchronicle.com/entertainment/article/laura-owens-fraud-paternity-echard-20314350.php)



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23 Although the unusual background story of the paternity case between Ms. Owens
24 and Mr. Echard gives some context to why we are here, that case has virtually nothing to
25 do with the harassment injunction sought by Ms. Owens. In her petition, Ms. Owens
26 explained that at some point, it appears Mr. Andrejev became interested in the *Owens v.*
27 *Echard* story, as have many others. That much is not surprising, and is certainly not
28 unlawful by itself.

1 What *is* unusual, and unlawful, about Mr. Andrejev is the degree, type, and number
2 of obsessive, bizarre, and frightening posts he has made which raise serious concerns
3 regarding his mental health. Specifically, as Ms. Owens explained in her petition, Mr.
4 Andrejev has made more than 1,300 posts about her,¹ with many appearing to be entirely
5 nonsensical and/or containing disturbing images and/or threatening sexual comments. For
6 example, Mr. Andrejev’s Instagram page currently contains *dozens* of posts which show
7 Ms. Owens crying in distress, with her name featured in bright yellow subscript.



21 ¹ Mr. Andrejev has posted more than 150 *additional* times since he was enjoined from further acts
22 of harassment. Making a “post” about Ms. Owens does not necessarily mean Mr. Andrejev
23 personally created the content *in* the post. In other words, “posting” can include publishing both
24 original videos/images which Mr. Andrejev created, as well as “*reposting*” content created by third
25 parties. In her petition, Ms. Owens claimed Mr. Andrejev “created, curated and continues to
26 maintain a playlist of more than 1,320 videos focused exclusively on [her].”

27 In Paragraph 7 of his declaration submitted in this matter, Mr. Andrejev disputes this, but not
28 directly — he claims to have posted “fewer than 400 *original* videos”, without ever addressing the
amount of times he has *reposted* third party content about Ms. Owens (which appears to be much,
much, much higher).

Of course, harassment merely requires a showing the defendant engaged in two or more harassing
acts. *See* A.R.S. § 12-1809(T)(1)(a). Thus, whether Mr. Andrejev has personally created “fewer
than 400 videos” about Ms. Owens, or whether he had created *and* republished thousands of videos
is simply not relevant here.

1 Mr. Andrejev has also posted filthy, disgusting sexual comments about Ms. Owens
 2 on YouTube, such as the example shown below. In this still image taken from a live stream
 3 video, Mr. Andrejev displays himself alongside a variety of “Horse Wisk Extensions”
 4 with Ms. Owens’ profile. Sample product names include: “Sucky-Fucky”, “Cuppin the
 5 Ball Sac” and “You Just Can’t Swallow Any More”.²



18 **0262 RAISE-A-THON (2) - Mike Marraccini**

19  **Hey Rob**
 20 1.09K subscribers Join Subscribe 42 Share Ask

21 ² All First Amendment lawyers understand that at least when they involve **celebrities** and
 22 **general purpose public figures**, the First Amendment usually protects jokes/parody (even
 23 if rude/disgusting). *See Hustler v. Falwell*, 485 U.S. 46, 108 S.Ct. 876 (1988) (finding First
 24 Amendment protected offensive parody involving a famous public figure). Ms. Owens is
 25 neither a celebrity nor is she a general-purpose public figure. This matters because when a
 26 plaintiff is *not* a public figure, the protection provided to speech by the First Amendment
 27 may be much lower or even non-existent. The U.S. Supreme Court and Arizona courts have
 28 also held *harassment* and threatening conduct may not receive any First Amendment
 protection at all; “True threats of violence are outside the bounds of First Amendment
protection and punishable as crimes.” *Counterman v. Colorado*, 600 U.S. 66, 69 (2023)
 (emphasis added); *see also State v. Synder*, 2024 WL 342301, *5 (Ariz. App. 2024)
 (recognizing, “harassment is not protected speech”) (emphasis added).

1 In addition to publishing the above comments, Mr. Andrejev has done much more.
2 As explained in Ms. Owens’ petition, Mr. Andrejev recently (on January 14, 2026)
3 published a video in which he encouraged viewers to locate Ms. Owens by contacting
4 places he believed she *might be*, and by falsely impersonating her in an effort to verify her
5 location. *See* Petition at 2-3 (describing incident on 1/14/2026). Mr. Andrejev has also
6 made threatening, demeaning and insulting sexual statements about Ms. Owens, stating
7 he believes she belongs in prison, and that “the guards there will rape, rape, will say rape
8 her ass ...” while also referring to her as a “cunt whore”. Pet. at 3 (describing incident on
9 11/11/2025). Mr. Andrejev has further described following Ms. Owens to virtually every
10 court hearing she has attended, while expressing a desired to “fucking bitch slap her
11 through the phone”. Pet. at 5 (describing incident on 11/6/2025).

12 Based on these and multiple other harassing acts, Ms. Owens sought injunctive relief
13 from this Court which was granted on January 20, 2026. Mr. Andrejev now challenges the
14 order on several grounds.

15 As explained below, Mr. Andrejev’s arguments are not just without merit, they are
16 at best frivolous, and at worst, intentionally misleading if not outright fraudulent.
17 Accordingly, the Court should affirm the harassment injunction in its entirety. The Court
18 should also order Mr. Andrejev to pay Ms. Owens’ reasonable attorney’s fees and costs
19 in an amount to be determined later.

20 Finally, given the extreme circumstances of this case and in light of evidence
21 showing Mr. Andrejev has continued to violate this Court’s order after it was served, the
22 Court should refer this matter to the Maricopa County Attorney’s Office for a
23 determination regarding potential criminal charges to be brought against Mr. Andrejev.
24 Such charges may include, among other things, violations of A.R.S. § 13-2916 (Use of an
25 electronic communication to terrify, intimidate, threaten or harass); A.R.S. § 13-
26 2921(A)(1) (criminal harassment); A.R.S. § 13-2921.01(A)(1) (felony aggravated
27 harassment); A.R.S. § 13-2923 (felony stalking) and/or A.R.S. § 13-2702 (perjury), among
28 others.

1 **II. DISCUSSION**

2 Mr. Andrejev’s motion raises three primary arguments in his defense. The first is a
3 factual argument while the other two are legal:

- 4 **1.) “I didn’t do [some of] it.”** Mr. Andrejev denies making *some* of the statements
5 attributed to him by Ms. Owens. As explained below, this argument is, at best,
6 intentionally misleading and, at worst, may constitute perjury. In short, Mr.
7 Andrejev made every statement he is accused of. To the extent he has denied this
8 in a sworn declaration, the evidence appears to show he committed perjury in
9 making that denial.
- 10 **2.) “I didn’t contact her directly, so that’s not harassment.”** Mr. Andrejev’s
11 second argument is purely legal – i.e., that Arizona harassment law requires the
12 defendant to have *direct contact* with his victim before relief may be granted.
13 This argument is a clear material misstatement of the law, which this Court must
14 firmly reject.
- 15 **3.) “Even if I did it, the First Amendment protects me.”** As a final point, like
16 many other defendants before him have unsuccessfully tried to do, Mr. Andrejev
17 seeks to hide behind the First Amendment. While he is entirely correct the First
18 Amendment provides broad protection for speech, there is no question that
19 protection is *not unlimited*. Based on the extensive legal authority cited below, it
20 is clear Mr. Andrejev’s words, deeds, and actions fall *far* outside even the most
21 liberal application of the First Amendment.

22 Each issue is explained further below.

23 **a. Mr. Andrejev Made Every Alleged Statement**

24 In his motion and supporting declaration, Mr. Andrejev accuses Ms. Owens of **lying**
25 **to this Court** about what he said. On that much, he does not mince words: “contrary to
26 Owens’ mischaracterizations and outright fabrications of what Andrejev actually said,
27 nothing in those livestreams [videos] meets the criteria of A.R.S. § 12-1809.” Mot. at 2:15–
28 17 (emphasis added).

 Because this presents a factual dispute, it is not appropriately raised or addressed
in the context of a dispositive motion. However, for the Court’s benefit, it is important to
explain one thing as clearly as possible – it appears Mr. Andrejev committed perjury in his
declaration insofar as he denied, under oath, making certain statements.

1 That is a serious allegation, so let's be extremely specific. Using just one example,
2 in Paragraph 22 of his sworn declaration, shown below, Mr. Andrejev claims Ms. Owens
3 "falsely" accused him of making several violent and offensive statements. Mr. Andrejev
4 quotes each of these alleged statements, and then denies making any of them, asserting the
5 statements "appear[] nowhere in the transcript", either at the time claimed by Ms. Owens,
6 "or anywhere else in the transcript." He even goes further, stating the quoted statements do
7 not appear "in *any other livestream Owens cites*, for that matter." (emphasis added).

8
9 22. Owens falsely alleges that during this livestream at 16:31-16:37 I said, "If she
10 goes and says I'm indigent because the court said so, I'll fucking bitch slap her through the
11 phone, through the camera, whatever I can get to her." Petition at 5. That statement appears
12 nowhere in the transcript (or in any other livestream Owens cites, for that matter). *See generally*
13 *Ex. 5.* Owens alleges that I made other statements that appear nowhere in the transcript,
14 including "She's a fucking twat," "She's a hole," "Lowe is a cunt," "And recently, a bloody ass
15 cunt." Petition at 5. These do not appear at the timestamps she cites or anywhere else in the
16 transcript. *See generally Ex. 5.*

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19 Unfortunately for Mr. Andrejev, Ms. Owens kept receipts, and those receipts show
20 two things. First, Mr. Andrejev did, in fact, make every statement Ms. Owens has cited.
21 This is not an opinion; it is a fact, as can be easily verified by simply viewing the video
22 which will be offered in evidence at the hearing, and which is available here:

23 <https://gingraslaw.com/Andrejev.mp4>

24 In this video, contrary to his sworn affidavit, Mr. Andrejev recorded himself
25 making the following statements at the following timestamps:

- 26
- 27 • (16:25) "LO, the poor indigent. If she goes and says I'm indigent because the court
28 said so," (16:31) "I'll fucking bitch slap her through the phone, through the camera,
whatever I can get to her."

- 1 • (19:57) “Yes, she’s a fucking twat. She’s a hole.”
- 2 • (20:05) “LO [Laura Owens] is a cunt. And recently, a bloody ass cunt.”
- 3 • (20:13) “I needed to go hang out at the hospitals and find out if she was admitted
- 4 anywhere or actually had surgery. Not just a hangnail up her ass.”

5 Thus, contrary to Mr. Andrejev’s sworn denials, he did, in fact, make precisely the
6 statements Ms. Owens cited in her petition.

7 Based on this, it appears Mr. Andrejev knowingly lied under oath when he denied
8 making these statements.³ That fact is *incredibly* ironic given that Ms. Owens has been
9 charged with perjury, and although she has not been convicted of any crime, Mr. Andrejev
10 has posted *hundreds* of videos calling for her to be convicted and sent to prison. He has
11 also laughed about her being “**raped in the ass**” while incarcerated. The irony, and
12 boundless hypocrisy, cannot be overstated.

13 In any event, Mr. Andrejev’s first defense – denying that he made certain harassing
14 statements identified in Ms. Owens’ petition – is entirely groundless.

15 **b. Mr. Andrejev Misstates The Requirements of Arizona Law**

16 The second point raised by Mr. Andrejev is a legal argument regarding the statutory
17 requirements of A.R.S. § 12-1809(T)(1)(a) which defines harassment as a series of acts
18 “*directed at a specific person ...*.” According to Mr. Andrejev, videos posted on social
19 media cannot meet that definition unless the defendant sends them to his victim:

20 First, although Andrejev’s YouTube videos are *about* Owens, they are not
21 *directed* at her ... The law’s requirement that harassment be directed at the
22 plaintiff means that statements made to others do not qualify, even if the
23 plaintiff becomes aware of them.

24 Mot. at 5:19–24 (citing *LaFaro v. Cahill*, 203 Ariz. 482, 485–86 (Ariz. App. 2002)).

25 ³ In fairness, Ms. Owens did mistakenly attribute some of the statements quoted in her
26 petition to the *wrong source video*. Ms. Owens’ petition claimed Mr. Andrejev made the
27 “bitch slap” statement (among others) in a video entitled “**0272 Trial LO v. MM – Travel**
28 **Granted**”. See Petition at 5 (incident dated 11/6/2025). This was a simple clerical error.
The quoted statements do not appear in *that* video; they appear in another video entitled
“**0273 LO v. CE Judgment Debtor Examination Filings**” which is linked above.

1 This argument materially misstates the law. Putting aside the fact *LaFaro* involved
2 events which occurred in late 2000, more than a quarter century ago, the case did not
3 involve statements published on social media (YouTube and Instagram did not exist when
4 *LaFaro* was decided). Rather, *LaFaro* involved *verbal* public statements made by a
5 political candidate to a small crowd “in front of the Tempe Public Library” and at a polling
6 center. *See LaFaro*, 203 Ariz. at ¶ 4.

7 Given the ethereal and limited nature of words spoken to a small crowd (which are
8 not remotely comparable to videos posted on social media which remain visible to an
9 *unlimited number* of people *forever*), the Court of Appeals held verbal comments of this
10 type did not meet the statutory requirements of A.R.S. § 12-1809 because they were not
11 “directed at” the plaintiff.

12 This holding does nothing to help Mr. Andrejev. This is so because in the quarter
13 century since *LaFaro* was decided, the Court of Appeals has established entirely different
14 rules for dealing with people like Mr. Andrejev who use social media and the Internet to
15 harass, stalk, and terrorize others. Thus, although *LaFaro* remains valid law, the case is
16 strictly limited to the facts it presented; i.e., verbal statements made offline to third parties
17 do not meet the “directed at” requirements of the statute. This rule has no application here.

18 Here’s why—in *State v. Snyder*, 2024 WL 342301 (Ariz. App. 2024), the defendant
19 was charged with criminal harassment based on social media posts he made about the
20 victim, an ex-girlfriend named “B.B.” After Mr. Snyder was convicted, he appealed,
21 raising exactly the same legal argument Mr. Andrejev offers here; i.e., that because he only
22 made posts *about* B.B., but did not send them *directly to B.B.*, his conduct was not “directed
23 at” her as the statute requires:

24 Snyder argues the State failed to prove that he contacted or caused a
25 communication with B.B. between June 1, 2018, and August 1, 2018,
26 because he did not directly send B.B. any messages while her order of
27 protection was valid and B.B. only became aware of his social media posts
concerning her when third parties showed them to her.

28 *Snyder*, 2024 WL 342301, *2 (emphasis added).

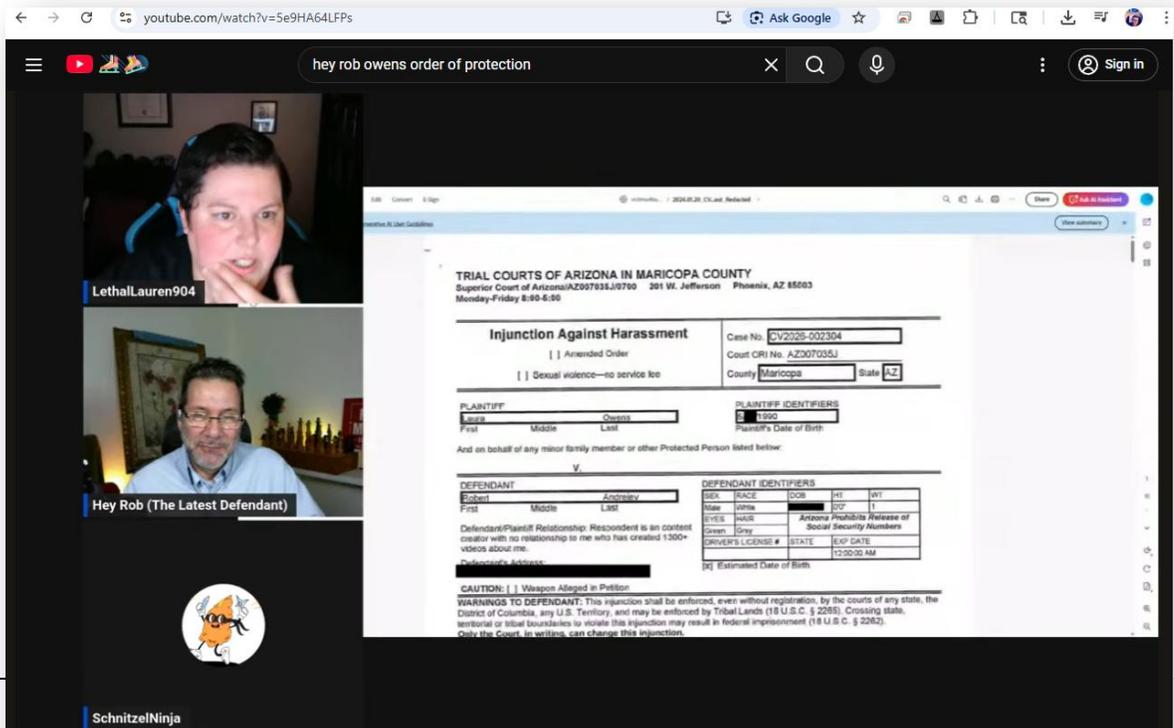
1 The Court of Appeals flatly rejected this argument and affirmed the criminal
2 conviction. In doing so, the Court explained that when a defendant posts statements about
3 a person on social media, and the victim learns about the posts through other means, that
4 meets the statutory requirement for acts “directed at” the plaintiff:

5 There is substantial evidence indicating that Snyder’s conduct was directed
6 at B.B., including him posting a video on his social media account that
7 showed the order of protection with B.B.’s name and address on it. Snyder
8 also argues that “no contact” occurred between him and B.B. after the order
9 of protection was served on June 1. But under the statute, a person commits
10 harassment if the person contacts, communicates, *or causes a communication*
11 *with another person* by verbal, electronic, or written means in a manner that
12 harasses.

11 *Id.* *3 (emphasis added).

12 Again, the Court must stop and consider something *astounding* – the defendant in
13 *Snyder* was convicted of felony aggravated harassment (a conviction later affirmed on
14 appeal) because after he was ordered to stop harassing the victim, he posted a video on
15 social media showing the order of protection with the victim’s name and address on it.

16 Want to guess what occurred after this Court ordered Mr. Andrejev to stop
17 harassing Ms. Owens? He committed exactly the same felony as the defendant in *Snyder*:
18 see <https://www.youtube.com/watch?v=5e9HA64LFPs>



1 *Snyder* is not the only Arizona case to reach that conclusion. For instance, *Raber v.*
2 *Wagner*, 571 P.3d 902 (Ariz. App. 2025) involved a defendant who was accused of
3 harassment by sending texts and emails to the victim’s “friends, relatives, work colleagues,
4 and other contacts.” The speech in question was extremely tame compared to the
5 disgusting, vile remarks made by Mr. Andrejev. Nevertheless, the Superior Court found
6 the defendant’s conduct sufficient to support an order of protection.

7 The Court of Appeals *affirmed*. In doing so, the Court clarified that notwithstanding
8 *LaFaro*, when electronic means are used to harass, direct victim contact is NOT required:
9 “In so holding, we take no issue with our previous decisions that have vacated protective
10 orders on the ground that a defendant’s communications were directed toward third parties
11 rather than directly at the victims.” *Raber*, 571 P.3d at 906 (citing *LaFaro*).

12 Again, these points demonstrate that Mr. Andrejev’s arguments are not only
13 groundless, they are frivolous. This justifies affirming the existing order and granting Ms.
14 Owens’ request for attorney’s fees. It also warrants referring Mr. Andrejev to the County
15 Attorney’s Office for criminal prosecution, exactly as occurred in *Snyder*.

16
17 **c. The First Amendment And Arizona Constitution Do Not Protect**
18 **Criminal Harassment And Similar Crimes**

19 The final point raised by Mr. Andrejev is a second legal argument – that his conduct
20 is protected by the First Amendment. Notably, Mr. Andrejev does not cite a single case
21 (from the Supreme Court or anywhere else) which held *criminal harassment* is protected
22 by the First Amendment. That failure is hardly surprising given that the U.S. Supreme
23 Court has repeatedly agreed – provided the appropriate mental state (recklessness) is
24 shown, harassing threats can be punished (civilly and criminally) in a manner consistent
25 with the First Amendment. *See Counterman v. Colorado*, 600 U.S. 66 (2023) (establishing
26 recklessness requirement in criminal case where defendant sent threatening Facebook
27 messages to the victim, such as: “Fuck off permanently.” “Staying in cyber life is going
28 to kill you.” “You’re not being good for human relations. Die.”)

1 Consistent with U.S. Supreme Court precedent *allowing* for criminal (and civil)
2 punishment of harassing speech and conduct, Arizona Courts have repeatedly explained:
3 “harassment is not ... protected speech.” *State v. Williams*, 2018 WL 3569309, *3 (Ariz.
4 App. 2018) (quoting *Brown v. Entm’t Merchs. Ass’n*, 564 U.S. 786, 790 (2011)); *see also*
5 *Snyder*, 2024 WL 342301, *5 (agreeing, “harassment is not protected speech”)

6 To understand this conclusion, this Court need only consider *State v. Williams*
7 which involved facts nearly identical to those here. *Williams* involved a photographer who
8 harassed a model, primarily by posting comments about her on social media. After the
9 victim obtained a harassment injunction, the defendant continued making comments about
10 her online, referring to her as a “fraud” and “real porno actress”. *Williams*, 2018 WL
11 3569309, *1. The defendant also posted a statement about the victim on his Facebook page,
12 “accusing her and the judge who had granted the injunction of ethical violations and stating,
13 ‘I can’t wait to see you in orange and your judge will be your cell mate. I guarant[ee].’” *Id.*

14 These statements are virtually identical to the types of comments Mr. Andrejev has
15 made about Ms. Owens, with the main difference being the volume of content (which is
16 FAR worse here). Consider this – the defendant in *Williams* posted only a tiny fraction of
17 the amount of content Mr. Andrejev has created targeting Ms. Owens. Despite this, Mr.
18 *Williams* was convicted of harassment and sentenced to 1.75 years in prison. *See id.*

19 On appeal, the Court of Appeals rejected every argument raised and affirmed the
20 prison sentence. In doing so, the Court rejected exactly the same statutory and First
21 Amendment arguments Mr. Andrejev presents here; “*Williams* asserts he ‘had a
22 constitutionally protected right to use social media as long as he did not contact [K.S.] or
23 engage in unprotected speech.’” *Id.* at *3. The Court’s response: NO, he did not.

24 There is no reason for this Court to reach a different conclusion. Mr. Andrejev’s
25 words and actions are clear criminal violations of Arizona law. If anything, Mr. Andrejev’s
26 conduct is *far worse* than any of the examples cited above.

27 This Court properly determined as much when it ordered Mr. Andrejev to stop
28 harassing Ms. Owens. Despite that order, Mr. Andrejev did exactly what so many other

1 stalkers/harassers have done – he simply ignored the Court’s order and continued harassing
2 Ms. Owens exactly as he did before. Like the defendant in *Williams*, Mr. Andrejev is not
3 engaged in protected speech; he has committed, and continues to commit, serious criminal
4 violations of Arizona law, including (it appears) perjury in the course of the pleading he
5 filed in this matter. He must be held accountable for that abuse, exactly as the Arizona
6 Constitution requires:

7 Every person may freely speak, write, and publish on all subjects,
8 *being responsible for the abuse of that right.*

9 Ariz. Const., Art. 6, § 6 (emphasis added).

10 **III. CONCLUSION**

11 Mr. Andrejev’s motion should be denied, and the Court should award Ms. Owens
12 her reasonable attorney’s fees and costs. The Court should further refer this matter to the
13 Maricopa County Attorney’s Office for further investigation and charging, if appropriate.

14 DATED February 13, 2026.

15 GINGRAS LAW OFFICE, PLLC

16 

17 David S. Gingras

18 Attorney for Petitioner Laura Owens

1 **Original** e-filed through www.azturbocourt.com
2 and **COPIES** e-delivered Feb. 13, 2026 to:

3 Matthew E. Kelly, Esq.
4 BALLARD SPAHR LLP



5
6 Attorney for Defendant Robert Andrejev

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8 A handwritten signature in blue ink, appearing to read 'Dudong', written over a horizontal line.
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