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7 ARIZONA SUPERIOR COURT

8 MARICOPA COUNTY

9 10 LAURA OWENS,

NO. CV2026-002304

11 Plaintiff,

12 **MOTION TO QUASH INJUNCTION
AGAINST HARASSMENT**

13 vs.

14 ROBERT ANDREJEV,

15 (Hearing Requested)

16 Defendant.

17
18 Pursuant to A.R.S. 12-1809(H), Rule 38 of the Arizona Rules of Protective Order
19 Procedure, Art. 2, § 6 of the Arizona Constitution and the First Amendment to the U.S.
20 Constitution, Defendant Robert Andrejev moves this court for an order quashing the
21 injunction against harassment (the “Injunction”) issued in this matter on January 20, 2026.
22 Defendant submits this Motion contemporaneously with his Request for Hearing. This
23 Motion supported by the following memorandum of points and authorities.

24 **Introduction**

25 The Injunction should be quashed because it represents an attempt by the defendant
26 in a highly publicized criminal case, Laura Owens (the Plaintiff here), to retaliate against
27 and suppress the speech of an online commentator who has made statements about her
28

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1 criminal case that she simply does not like. Plaintiff Laura Owens is facing *14 felony*
2 *charges* including perjury, forgery, tampering with evidence and identity theft for allegedly
3 lying and falsifying records to support false paternity allegations against two men,
4 including a former star of the reality television show “The Bachelor.” *See* Indictment,
5 *State v. Owens*, No. CR2025-007905-001 (Ariz. Super. Ct. Maricopa Cnty. filed Nov. 4,
6 2025), a copy of which is attached hereto as Exhibit A. Given the subject matter and the
7 involvement of a celebrity, the criminal case against Owens has gained widespread
8 attention both in Arizona and worldwide.¹

9 Defendant Robert Andrejev has been following the Owens case, including by
10 attending public court hearings and obtaining public court documents, and has discussed
11 the case and his opinions about the matter in livestreamed conversations with his audience
12 on YouTube. To be sure, he has been critical of Owens’ conduct and skeptical of her
13 assertions made in court and outside of her criminal prosecution. But his livestreams are
14 commentaries about issues of public concern that are fully protected by the Arizona
15 Constitution and the First Amendment. And, contrary to Owens’ mischaracterizations and
16 outright fabrications of what Andrejev actually said, nothing in those livestreams meets the
17 criteria of A.R.S. § 12-1809. Not only was his speech not directed at Owens – it was
18 publicly posted online for the world to see – it did not contain *any* threatening or harassing
19 statements that would support entry of an injunction that punishes and suppresses his
20 speech. In short, Owens has not met her high burden to show that Andrejev’s speech had
21 lost its constitutional protection, and the injunction should be quashed.

22 **Factual and Procedural History**

23 After an intimate encounter in 2023 with former “Bachelor” star Clayton Echard,

24 ¹ See, e.g., Miguel Torres, *Woman who faked pregnancy with ‘Bachelor’ star accused of*
25 *second scam in Arizona*, azcentral.com (Nov. 6, 2025),
26 <https://www.azcentral.com/story/news/local/scottsdale/2025/11/06/laura-owens-charged-in-2nd-arizona-false-pregnancy-case-bachelor/87127979007/>; Julia Moore, *Clayton*
27 *Echard Says ‘Justice Is Finally Served’ as His Paternity Suit Accuser Is Indicted on Felony*
28 *Charges: ‘This Nightmare Is Over’*, People (May 8, 2025), [https://people.com/bachelor-clayton-echard-reacts-as-his-paternity-suit-accuser-is-indicted-on-felony-charges-11730737.](https://people.com/bachelor-clayton-echard-reacts-as-his-paternity-suit-accuser-is-indicted-on-felony-charges-11730737/)

1 Owens claimed she was pregnant and filed a paternity action against Echard, who denied
2 paternity. *Owens v. Echard*, No. 2 CA-CV 2024-0315, 2025 Ariz. App. Unpub. LEXIS
3 333, at *1-2 ¶ 2 (App. Mar. 28, 2025) (mem. decision).² At the conclusion of the case, the
4 trial court awarded Echard nearly \$150,000 in attorneys' fees and costs, finding that Owens
5 filed the claim "without basis or merit" and had provided false testimony. *Id.* at *3 ¶ 5, *8-
6 9 ¶ 13. Owens was subsequently charged with seven felony counts related to the Echard
7 case and in November 2025 she was charged in a superseding indictment with 14 felonies:
8 five counts of perjury, three counts of forgery, two counts each of identity theft and
9 fraudulent schemes and artifices, and one count each of tampering with evidence and theft
10 by extortion. *See* Ex. 1.

11 Andrejev is a YouTube content creator who posts videos and hosts livestream
12 conversations about several different topics, including Owens' unsuccessful paternity
13 lawsuit against Echard and the criminal charges that followed. He is just one of many
14 people who have commented online about this high-profile case.

15 On January 20, 2026, Owens filed a petition for an injunction against harassment,
16 naming Andrejev as the defendant (the "Petition"). A copy of the Petition is attached as
17 Exhibit C for ready reference. The Petition requests an order prohibiting Andrejev from
18 possessing firearms and requiring Andrejev to stay away from Owens' residence,
19 work/business, and school/other, and "to stop targeting me through harassment or
20 surveillance, including monitoring or commenting on my location, travel, or court
21 attendance; encouraging others to impersonate me or determine my whereabouts; and
22 making sexualized or threatening statements about me. If Respondent attends court, require
23 him to remain a reasonable distance from me and have no interaction." Pet. at 8.

24 Much of the Petition consists of Owens complaining about alleged comments by
25 Andrejev or his viewers that express skepticism about her representations to the court in
26 her criminal case and predict that she will be convicted and go to prison, or that use vulgar

27 ² Pursuant to Arizona Supreme Court Rule 111, a copy of this memorandum decision is
28 attached as Exhibit B.



1 terms referring to her. For example, Owens asserts that Andrejev made “sexualized and
2 coercive” comments by merely mentioning his proximity to her while he was observing
3 public court proceedings, Pet. at 5, and casts as a threat a statement that her “day of
4 reckoning is coming,” referring to her upcoming trial, *id.* at 7. Owens asserts that Andrejev
5 encouraged his viewers to impersonate her and “locate her real-time physical whereabouts”
6 in a discussion speculating that her purpose for a court-approved trip to California was to
7 participate in a horse show in conjunction with attending to a sick relative, as she told the
8 court in her criminal case. *Id.* at 2-3.

9 Much of the petition misrepresents what Andrejev actually said. In his Declaration,
10 attached as Exhibit D, Andrejev explains that many of the statements attributed to him do
11 *not* appear in the video recordings or transcripts of the livestreams. Owens alleges, for
12 example, that at 16:31-37 of a livestream titled “0272 Trial LO v. MM-Travel Granted,”
13 Andrejev said, “I’ll fucking bitch slap her through the phone, through the camera, whatever
14 I can get to her.” Pet. at 5. *But nothing of the sort appears anywhere in the transcript of*
15 *the video.* Andrejev Decl. at ¶ 22.

16 In the segment Owens cites as evidence that Andrejev encouraged his viewers to
17 impersonate Owens, Andrejev discusses Owens’ January 13, 2026 motion in her criminal
18 case to allow her to travel to California, which the court granted. *Id.* at ¶¶ 10-12. Andrejev
19 reads a written comment from a viewer that says, “recall [sic] up all the horse shows in
20 California this weekend and pretend to be low [L.O.] and say you want to confirm your
21 attendance at the competition that way you can find out where she will be.” *Id.* at ¶ 11.
22 Andrejev comments, “That’s a fair way to do it, right? And we all know the names. And
23 you’re not causing any trouble. You’re not influencing anything. You’re not talking bad.
24 You’re just using your First Amendment rights to find out some information that’s public
25 knowledge anyway.” *Id.* He then suggests attending a public horse show to see if Owens
26 is there and potentially purchasing professional photos or video of the event that are on sale
27 to the public to demonstrate her attendance. *Id.*

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1 On January 20, the day Owens filed the Petition, Court Commissioner Lindsey
2 Coates granted it in part, ordering Andrejev not to contact Owens, not to go to or near her
3 residence, and not to “encourage anyone to impersonate or make contact with Plaintiff.”
4 Injunction at 1-2. Andrejev was served with the Petition and Injunction on January 26.

Argument

6 This Court should quash the Injunction because Owens has not shown and cannot
7 prove that Andrejev engaged in harassment as defined by the statute, and because the
8 Injunction impermissibly restricts Andrejev's constitutionally protected speech on issues
9 of public concern. In brief, Owens' allegations in this civil matter are no more reliable
10 than the claims in her unsuccessful paternity lawsuit against Mr. Echard (or her various
11 statements that gave rise to the State's criminal indictment of her for perjury, forgery and
12 the like).

13 Arizona law allows for injunctions where the defendant has engaged in harassment,
14 which is defined as:

15 “[a] series of acts over any period of time that is directed at a specific person
16 and that would cause a reasonable person to be seriously alarmed, annoyed
17 or harassed and the conduct in fact seriously alarms, annoys or harasses the
person and serves no legitimate purpose.”

17 A.R.S. § 12-1809(T)(1)(a). Andrejev's commentary on Owens' criminal case does not
18 remotely qualify as "harassment" under the statute.

First, although Andrejev's YouTube videos are *about* Owens, they are not *directed* at her. Even according to Owens' own allegations, Andrejev never contacted Owens, either directly or through a third person. Andrejev's Declaration affirms that he has never communicated with her. Andrejev Decl. at ¶ 6. The law's requirement that the harassment be directed at the plaintiff means that statements made to others do not qualify, even if the plaintiff becomes aware of them. *LaFaro v. Cahill*, 203 Ariz. 482, 485-86 ¶ 13 (App. 2002). In *LaFaro*, the plaintiff political activist obtained an injunction against a Tempe city council member who allegedly called the activist a "bigot, fascist, homophobe, and Nazi" in a conversation with another person the plaintiff happened to overhear. *Id.* Even

1 though the activist overheard the comment, it was not directed at him and thus did not
2 support an injunction. *Id.* So too, here. That Owens can, like anyone else with an Internet
3 connection, view Andrejev's video commentaries about her does not mean those
4 commentaries are directed at her, and she cannot be harassed by them as a matter of law.

5 Second, as was the case in *LaFaro*, that Andrejev allegedly offended Owens by
6 mocking and criticizing her using purportedly vulgar and sexually charged language does
7 not transform his commentary about her criminal prosecution into harassment. As the
8 Court of Appeals observed, "in public debate our own citizens must tolerate insulting, and
9 even outrageous, speech in order to provide adequate breathing space to the freedoms
10 protected by the First Amendment." *Id.* at 488 ¶ 20. *See generally Snyder v. Phelps*, 562
11 U.S. 443 (2011); *Rogers v. Mroz*, 252 Ariz. 335 (2022). Insults and invective such as those
12 Owens accuses Andrejev of saying are simply not harassment under the definition of the
13 statute.

14 To be sure, Andrejev's seeming endorsement of pretending to be Owens in a phone
15 call to determine if she was attending a horse show as well as helping a sick relative was
16 unwise. But it was not threatening. No one would have any reasonable expectation of
17 privacy in their attendance at an event open to the public, so even an improper attempt to
18 determine their attendance would provide no more information than could be gathered by
19 anyone else at the event. *Owens does not allege that she actually attended any horse show,*
20 *that Andrejev or any of his viewers actually impersonated her, or that she was followed or*
21 *menaced by anyone.*

22 Third, Andrejev's speech serves a legitimate purpose: speech about a closely-
23 watched criminal prosecution in which Owens is charged with 14 felonies. The videos
24 about which Owens complains are commentary about issues of public concern, which
25 "occupies the highest rung of the hierarchy of First Amendment values, and is entitled to
26 special protection." *Rodriguez v. Fox News Network, L.L.C.*, 238 Ariz. 36, 39 ¶ 10 (App.
27 2015) (quoting *Snyder*, 562 U.S. at 452). Because the videos related to matters of
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1 “political, social, or other concern to the community,” they serve that legitimate,
2 constitutionally protected purpose. *Id.* at 40 ¶ 11 (citation omitted). The statements
3 encouraging investigation into whether Owens was attending horse shows, for example,
4 served another legitimate purpose: discussion of whether a criminal defendant had misled
5 the court in obtaining permission to travel out of state.

6 Finally, the Injunction is unconstitutionally overbroad because it prohibits protected
7 speech under the Arizona Constitution and the First Amendment. It would bar Andrejev
8 from encouraging his viewers to “impersonate” Owens by portraying her in a satirical skit
9 or dramatic recreation of her alleged crimes, for example, which is clearly unconstitutional.
10 *See, e.g., Hustler Magazine, Inc. v. Falwell*, 485 U.S. 46 (1988). It would prohibit him
11 from encouraging his viewers to have any contact with Owens, even constitutionally
12 protected contact such as sending her non-threatening – or even supportive – letters or
13 emails. As the Arizona Court of Appeals has said, the test for whether an injunction such
14 as this one that restricts speech is constitutional “is whether the challenged provisions of
15 the injunction burden no more speech than necessary to serve a significant government
16 interest.” *LaFaro*, 203 Ariz. at 486-87 ¶ 17 (injunction prohibiting politician from any
17 contact with political activist unconstitutionally prevented politician from engaging in in-
18 person political debate) (cleaned up). The Injunction fails that test.

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Conclusion

2 For the foregoing reasons, Defendant Robert Andrejev respectfully requests that this
3 Court enter an order quashing the injunction against harassment entered against him in this
4 matter.

DATED this 6th day of February, 2026.

Respectfully submitted,

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