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HERRING NETWORKS INC.

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 FOR THE COUNTY OF SAN DIEGO - HALL OF JUSTICE  
10

11 HERRING NETWORKS INC., a California  
Corporation,

12 Petitioner,

13 vs.

14 CHELSEA GOSS,

15 Respondent.  
16

Case No.: 26CU007658C

17 MEMORANDUM OF POINTS AND  
18 AUTHORITIES IN SUPPORT OF  
19 PETITIONER HERRING NETWORKS  
20 INC.'S REQUEST FOR A PERMANENT  
RESTRAINING ORDER;  
21 SUPPLEMENTAL DECLARATION OF  
22 CHARLES HERRING AND  
23 DECLARATION OF RAMON SISON IN  
24 SUPPORT THEREOF

25 [Proposed Order on Permanent Restraining  
26 Order filed and served concurrently herewith]

27 Date: March 3, 2026

28 Time: 9:00 a.m.

Dept.: C-61

[Assigned to Hon. Chandra Reid, Dept. C-61]

1 MEMORANDUM OF POINTS AND AUTHORITIES

2 I. INTRODUCTION

3 By this action, pursuant to California Code of Civil Procedure section 527.8, Petitioner  
4 Herring Networks, Inc. (“Petitioner” or “Herring Networks”) seeks a permanent restraining order  
5 on behalf of itself and its employee Charles Herring, against a violent racist unhinged far-left social  
6 media influencer and activist named Respondent Chelsea Goss, aka Chelsea Gods (“Respondent”  
7 or “Goss”). On February 11, 2026, the Court issued a Temporary Restraining Order (“TRO”)  
8 against Goss. *Two days later she began violating the TRO.*

9 Petitioner Herring Networks and its employee Charles Herring file this Memorandum in  
10 support of a permanent restraining order against Respondent Goss. She has among other things and  
11 without limitation:

12 (1) at least twice physically trespassed onto Herring Networks’ property;

13 (2) aggressively and viciously harassed Herring Network’s employees, including Charles  
14 Herring while on Herring Networks’ property; and

15 (3) both before *and after* the Court issued the TRO to protect Charles Herring of Herring  
16 Networks, continued to post vile, threatening and doxing social media video posts which have been  
17 viewed and commented on by her social media followers, to the point where on February 14, 2026,  
18 three (3) days after the Court’s TRO was issued and Goss was served with the Order and after Goss  
19 continued with her posts encouraging her followers to go to Herring Networks’ property (and  
20 repeatedly saying the company name and address) in violation of the TRO, an anonymous caller left  
21 the following message on Herring Networks’ company voicemail:

22 **You guys really are as dumb as you fucking sound. That’s why**  
23 **you hired that child sex offender, [NAME REDACTED]. He**  
24 **rapes fucking kids, and you guys are paying and protecting**  
25 **pedophiles, like [NAME REDACTED] and Trump. You, will all,**  
26 **every mother-fucking last one of you, will pay for this shit. It’s all**  
27 **gonna burn the fuck down, motherfuckers, get ready.**

28 Indeed, the day before the anonymous phone message was left and just two days after the

1 TRO was issued, on February 13, 2026, Goss posted on social media a video of herself saying the  
2 following:

3           **Apparently Charles Herring, who owns One America News**  
4           **Network, located at 4757 South Morena Blvd in San Diego. That's**  
5           **4757 South Morena Blvd in San Diego does not like it when you**  
6           **point out the fact that they hired a pedophile and sex trafficker,**  
7           **[NAME REDACTED]. Apparently that hurts their feelings. They**  
8           **might file a restraining order on you. But I can tell you guys this,**  
9           **until March third, I have a temporary restraining order and I**  
10           **cannot go to 4757 South Morena Boulevard, but that doesn't**  
11           **mean that you can't go to 4757 South Morena Boulevard and pay**  
12           **One America News a visit and let know what you think about the**  
13           **fact that they hire pedophiles.**

14           No-doubt, one of the unhinged lunatics that follow Goss on social media, is the person who  
15 left the voicemail. Goss operates under the veil of purported comedian, journalist, and internet  
16 personality, when in reality, her focus apparently primarily consists of destructive vicious  
17 harassment and abuse with no legitimate purpose other than to aggravate, annoy, or put others under  
18 a credible threat of physical harm. A review of Goss' social media posts reveal that Goss appears to  
19 be aligned with far-left politics and ideology, and rather than engaging in peaceable, constructive  
20 debate and conversation, she causes substantial emotional distress and inflicts fear and the threat of  
21 physical harm on those whose political ideologies are not aligned with hers. Goss maintains several  
22 social media accounts and has thousands of followers, and she posts on her social media accounts  
23 several times a day. By way of just another example of the unhinged violence and threats which  
24 spew from Goss' mouth on her videos, is this rant (not against Herring directly, but against all those  
25 who would support the nationally known conservative One America News Network which is  
26 produced and disseminated by Herring Networks):

27           **And every MAGA, I wanna punch you in the fucking face. I**  
28           **wanna beat you up until you are a pulp on the ground. I wanna**

1 curb-stomp the shit out of you. You voted for Donald Trump,  
2 come tell me in the comments. I'm gonna find where you fucking  
3 live. I'm gonna beat up your whole fucking family. If you have a  
4 five year old kid, I'm gonna pick them off too. I fucking hate you  
5 guys.

6 Herring Networks therefore submits this memorandum as additional support in advance of  
7 the hearing scheduled for March 3, 2026, requesting the issuance against Goss of permanent  
8 restraining order enjoining her from harassing Herring Networks and Charles Herring – and from  
9 encouraging others to do so - either in-person or through the internet. This permanent order must  
10 also include the order that Goss stay at least 100 yards away from Charles Herring, his workplace  
11 (Herring Networks in San Diego), home and vehicle.

12 Furthermore, because the primary medium of Goss' harassment is through social media, it  
13 is respectfully requested that Goss be ordered to stop using her social media accounts to continue to  
14 harass Herring Networks and its employees and to remove all previous posts in which she has done  
15 so. This use of social media is not protected under the Constitution and an order preventing her  
16 from either directly or indirectly communicating with or about Herring Networks and Charles  
17 Herring by way of such electronic transmissions also is warranted.

18 **II. STATEMENT OF FACTS**

19 On or about August 1, 2025, Goss first trespassed onto the private employee parking lot  
20 owned by Herring Networks. Declaration of Charles Herring originally submitted in support of  
21 Application for Temporary Restraining Order (“Herring Decl.”), ¶ 6. During this trespass, which  
22 Goss filmed in its entirety, Goss made unjustified accusations regarding an employee of Herring  
23 Networks, yelling and claiming that he was a “pedophile” and “child-fucker.” Supplemental  
24 Declaration of Charles Herring (“Supp. Herring Decl.”), ¶ 5. Goss was then approached by Charles  
25 Herring and another of Herring Networks’ employees, who asked her to leave the property. Supp  
26 Herring Decl., ¶ 5. Goss engaged in harassing behavior, yelling profanities at the employees as she  
27 was leaving the property during that first trespass. Supp. Herring Decl., ¶ 5.

28 Next, on February 3, 2026, at approximately 1:00 pm, Goss again trespassed onto the private



1 Herring Networks employee parking lot. Herring Decl., ¶ 5. The employee parking lot is secured  
2 by a locked gate, which only opens when employees use a gate opener or if monitoring security  
3 opens the gate. Herring Decl., ¶ 4. Goss waited for an employee to exit the parking lot, which caused  
4 the parking gate to open, and she then trespassed onto the parking lot without permission. Herring  
5 Decl., ¶ 5. Like the last time Goss trespassed, she was filming during the entire incident. Herring  
6 Decl., ¶ 5. Charles Herring was informed that Goss had trespassed onto the property, so he went  
7 outside to meet Goss in the parking lot. Herring Decl., ¶ 7. Herring told Goss that she needed to  
8 leave the property, and Goss responded by yelling at Herring, specifically shouting “Why are they  
9 [One America News Network] in liberal Southern California?” Herring Decl., ¶ 7. Goss eventually  
10 exited the property while being escorted by Charles Herring, who did not engage with her physically  
11 or verbally. Herring Decl., ¶ 7. Goss continued to make harassing and obscene statements without  
12 merit. Herring Decl., ¶ 7. Goss yelled at other employees of Herring Networks, making racially  
13 charged remarks about “brown people,” that an employee “does not even speak English,” and that  
14 she was surprised “they haven’t called ICE” on the employee yet. Herring Decl., ¶¶ 8-9.

15 On February 11, 2026 Herring Networks filed for and the Court granted the TRO. On  
16 February 13, 2026, Petitioner had Goss personally served with the TRO papers. Declaration of  
17 Ramon Sison (“Sison Decl.”), ¶ 2, Ex. A.

18 Soon after being served with the TRO, Goss began violating it. Pursuant to the TRO, Goss  
19 was and is ordered not to do the following:

- 20 1. Harass, molest, strike, assault (sexually or otherwise), batter, abuse, destroy  
21 personal property of, or disturb the peace of the person.
- 22 2. Commit acts of violence or make threats of violence against the person.
- 23 3. Follow or stalk the person during work hours or to or from the place of work.
- 24 4. Contact the person, either directly or indirectly, in any way, including, but not limited  
25 to, in person, by telephone, in writing, by public or private mail, by email, by fax, or  
26 by other electronic means.
- 27 5. Enter the workplace of the person.
- 28 6. Take any action to obtain the person’s address or locations. If this item is not

1 checked, the court has found good cause not to make this order.

2 On February 13 and 15, 2026, Goss posted several videos on her social media accounts  
3 stating how she had been served with the TRO and then in violation of the TRO, she indirectly  
4 communicated by electronic means with Charles Herring and Herring Networks, while  
5 simultaneously harassing, abusing and disturbing their peace. Supp. Herring Decl. ¶¶ 2-4. As quoted  
6 hereinabove, Goss also encouraged her followers to go to Herring’s place of business, impliedly  
7 encouraging them to make threats of violence, stating that although she was not allowed to step foot  
8 on Herring Networks’ property, her followers were not prohibited from doing so. Supp. Herring  
9 Decl. ¶¶ 2-4. Goss repeatedly stated the address of Herring Networks’ office and mentioned Charles  
10 Herring’s name, with the express and implied intent that her social media followers continue to  
11 violate Herring Networks and its employees including Charles Herring, in the exact manner that she  
12 had been Ordered to stop. Supp. Herring Decl. ¶¶ 2-4. There can be no doubt that the unhinged  
13 maniac who left the anonymous voicemail quoted hereinabove is a follower of Goss’ posts.

14 **III. ARGUMENT**

15 **A. PETITIONER IS ENTITLED TO A PERMANENT INJUNCTION AGAINST**  
16 **RESPONDENT PURSUANT TO CODE OF CIVIL PROCEDURE § 527.8**

17 Code of Civil Procedure section 527.8 provides that an “ employer or collective bargaining  
18 representative of an employee who has suffered harassment... may seek a temporary restraining  
19 order and an order after hearing on behalf of the employee.” Cal. Civ. Proc. § 527.8. Under the  
20 statute, “harassment” is defined as “a knowing and willful course of conduct directed at a specific  
21 person that seriously alarms, annoys, or harasses the person, and that serves no legitimate purpose.  
22 The course of conduct must be that which would cause a reasonable person to suffer substantial  
23 emotional distress, and must actually cause substantial emotional distress.” Cal. Civ. Proc. § 527.8.

24 To be granted a permanent injunction after the hearing, the petitioner must establish “that  
25 great or irreparable harm would result to an employee without issuance of the prohibitory injunction  
26 because of the reasonable probability the wrongful acts will be repeated in the future.” *Scripps*  
27 *Health v. Marin*, 72 Cal.App.4th 324, 331 (1999); *see also City of San Jose v. Garbett*, 190  
28 Cal.App.4th 526, 542-543 (2010) (holding that a finding of irreparable harm could be based on the

1 history of a person's conduct).

2 By this memorandum, Herring Networks outlines additional facts to show that an order  
3 granting a permanent injunction after the hearing is warranted based on Goss' conduct and the  
4 reasonable probability that the wrongful acts will be repeated in the future – just as they have been  
5 repeated following the grant of the TRO.

6 Without the issuance of a permanent injunction preventing Goss from engaging in  
7 harassment towards Herring Networks' employees, the wrongful acts would certainly be repeated  
8 in the future. Goss has trespassed onto Herring Networks' property more than once, each instance  
9 with the intent to harass and disrupt the employees. Goss has made no indication that her conduct  
10 towards Herring Networks is a one-time occurrence, or that she will stop harassing its employees  
11 including Charles Herring. In fact, her conduct after the granting of the temporary restraining order  
12 explicitly violates the temporary restraining order and shows her intent to continue her campaign of  
13 harassment and abuse against Herring Networks and Charles Herring. In a post on Goss' Instagram  
14 account dated February 13, 2026 (after she was served with the TRO), Goss acknowledged the  
15 existence of the temporary restraining order against her (which she held in her hand on the video),  
16 which she admits prevents her from going to Herring Networks' property. Supp. Herring Decl. ¶ 2.  
17 However, Goss then publicly stated Herring Networks' address several times on the post and  
18 instructed her comrades to go to the property because she was not allowed to. Supp. Herring Decl.,  
19 ¶ 3.

20 Goss' conduct following the issuance of the TRO has already violated the Order in the  
21 following ways among others:

- 22 • Discussing the TRO and Charles Herring indirectly communicates with Charles  
23 Herring through an electronic means.
- 24 • Continuing to make threatening and defamatory posts about Charles Herring both  
25 harasses and disturbs his peace.
- 26 • Encouraging others to "visit" Herring Networks' office potentially poses threats of  
27 violence towards Charles Herring and other employees.
- 28 • Encouraging others to "visit" Herring Networks for the purpose that people follow



1 and/or stalk Charles Herring at his workplace

- 2 • Publicly repeating the address of Herrings' workplace constitutes actions to obtain  
3 his address or locations.

4 **B. GOSS' REPREHENSIBLE CONDUCT ALSO INCLUDES ILLEGAL**  
5 **DOXING**

6 Moreover, Goss' conduct in publicly repeating the workplace address of Charles Herring on  
7 the internet constitutes illegal doxing.

8 Under California Civil Code § 1708.89, doxing is defined as an "act when a person, with  
9 intent to place another person in reasonable fear for their safety... by means of an electronic  
10 communication device, and without consent of the other person, and for the purpose of imminently  
11 causing that other person unwanted physical, contact, injury, or harassment, by a third party,  
12 electronically distributes, publishes, emails, hyperlinks, or makes available for downloading,  
13 personal identifying information, including but not limited to... or an electronic message of a  
14 harassing nature about another person, which would be likely to incite or produce that unlawful  
15 action." Cal. Civ. Code § 1708.89 (a)(1).

16 Goss' actions of publicly posting the address of Charles Herring's work address for the  
17 purpose of encouraging her followers to trespass into it and harass him and the other employees  
18 directly violates the doxing statute. Under the statute, a person who has been harmed by a doxing  
19 violation may be entitled to equitable relief *such as a permanent injunction ordering the defendant*  
20 *to cease doxing activities*. Cal. Civ. Code § 1708.89 (d). As such, Goss' blatant statutory violation  
21 of this law and of the terms of her TRO warrant a permanent restraining order against her for the  
22 protection of Charles Herring.

23 **C. GOSS' SOCIAL MEDIA POSTS SHOULD BE ORDERED REMOVED AND**  
24 **SHE MUST BE PREVENTED FROM HER ONGOING SOCIAL MEDIA**  
25 **CAMPAIGN AGAINST HERRING NETWORKS AND ITS EMPLOYEES**

26 Petitioner also requests that the Court restrain Goss from committing the following  
27 additional illegal acts:

- 28 1. That Goss be restrained from posting on Facebook, Instagram, X and any

1 social media account any posts about Herring Networks or its employees including  
2 Charles Herring;

3 2. That Goss be ordered to remove any postings about Herring Networks, or  
4 its employees including Charles Herring; and

5 3. That Goss be restrained from posting Herring Networks' or its employee's  
6 including Charles Herring's addresses, telephone numbers, or any other identifying  
7 information on any internet website.

8 Such requests are narrowly tailored (in that they are limited to time, scope, and manner) to  
9 achieve the compelling interest of protecting Herring Networks and its employees including Charles  
10 Herring from Goss' campaign of abuse, harassment and the veiled threats of violence and physical  
11 harm. *See Garbett*, 190 Cal.App.4th at 537 (holding that as "speech strays further from the values  
12 of persuasion, dialogue and free exchange of ideas, and moves towards willful threats to perform  
13 illegal acts, the state has a higher latitude to regulate expression"); *see also Evans v. Evans*, 162  
14 Cal.App.4th 1157, 1168 (2008) (recognizing that narrowly tailored order restraining individual's  
15 freedom of speech is valid).

16 While restraints on the freedom of speech (commonly known as prior restraints) are  
17 generally disfavored, they are valid where, *as here* the interest in the prior restraint is compelling,  
18 the prior restraint is necessary and would be effective in promoting the compelling interest, and less  
19 extreme measures are unavailable. *Evans*, 162 Cal.App.4th at 1168 (restraining order precluding  
20 "false and defamatory statements" about the plaintiff on the internet are permissible if they are  
21 narrowly tailored to serve the compelling interest of protecting the plaintiff).

22 Relying on California law, in *Monex Deposit Co. v. Gilliam*, 2010 WL 2349095, \*1  
23 (C.D.Cal. 2010), the plaintiff sought, among other things, to restrain the defendant from continuing  
24 its campaign of harassment of the plaintiff's business through the posting of false and defamatory  
25 statements on the internet, including the phrase MonexFraud and its variants. The Court enjoined  
26 the defendants from "[p]ublishing or republishing on any website...or in any other manner or  
27 forum" certain statements concerning the plaintiff and ordered the defendant to stop using the word  
28 MonexFraud, or any variant thereof, within 72 hours of the entry of this judgment. *Id.*, \*9. The

1 U.S. District Court found that such was not an impermissible prior restraint because the order was  
2 narrowly tailored and that the plaintiff had a significant interest in preventing the dissemination of  
3 those statements. *Id.* (citing *Balboa Island Village, Inc. v. Lemen*, 40 Cal.4th 1141, 1156, 1162, 57  
4 Cal.Rptr.3d 320, 156 P.3d 339 (2007); *Evans*, 162 Cal.App.4th at 1168–69, 76 Cal.Rptr.3d 859)).

5 Similarly here, in addition to making permanent the protections Ordered in the TRO  
6 (including preventing Goss from using electronic means to continue harassing Herring Networks  
7 and its employees including Charles Herring), Petitioner requests a narrowly tailored order expressly  
8 restraining Goss from posting any information on social media websites mentioning Herring  
9 Networks and its employees including Charles Herring to protect them from Goss’ pervasive pattern  
10 of abuse, harassment and threats.

11 Consequently, as set forth in Petitioner’s Proposed Permanent Restraining Order, Petitioner  
12 respectfully requests that in addition to the conduct for which Goss has been temporarily restrained,  
13 she also be permanently restrained from creating or engaging in social media posts as outlined in  
14 the beginning of this section.

15 **IV. CONCLUSION**

16 For the reasons set forth in the Petition and above, Petitioner respectfully requests that the  
17 Court enter a permanent restraining order and injunction against Respondent following the hearing  
18 on the Petition on March 3, 2026.

19 Respectfully submitted,

20 Dated: February 27, 2026

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22  
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