

Exhibit 1

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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION
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11 J. DOE, M. ROE,

12 Plaintiffs,

13 v.

14 COUNTY OF SAN BENITO,

15 Defendant.
16

Case No. 5:25-cv-10237

**DECLARATION OF PLAINTIFF J. DOE
IN SUPPORT OF MOTION TO QUASH
ADMINISTRATIVE SUBPOENA AND
GRANT TEMPORARY RESTRAINING
ORDER**

17 I, J. Doe, declare as follows.

18 1. I am an individual over 18 years of age and one of the Plaintiffs in this action. I can
19 testify to the following matters from personal knowledge. I reside in San Benito County.

20 2. For the reasons explained below, I make this declaration under the pseudonym of J.
21 Doe to protect my privacy and anonymity.

22 3. I am one of the anonymous authors and publishers of Benito Beet Beat, a satirical
23 news outlet published at <https://www.facebook.com/BenitoBeetBeat/>.

24 4. Benito Beet Beat is clearly identified on Facebook as a “Satire/Parody” page that
25 says, “Benito Beet Beat Serving up a fresh, satirical slice of local politics and news—directly from
26 the root of San Benito County. We peel back the layers of boardroom blunders and county capers,
27 spicing it up with a dash of irony.”
28

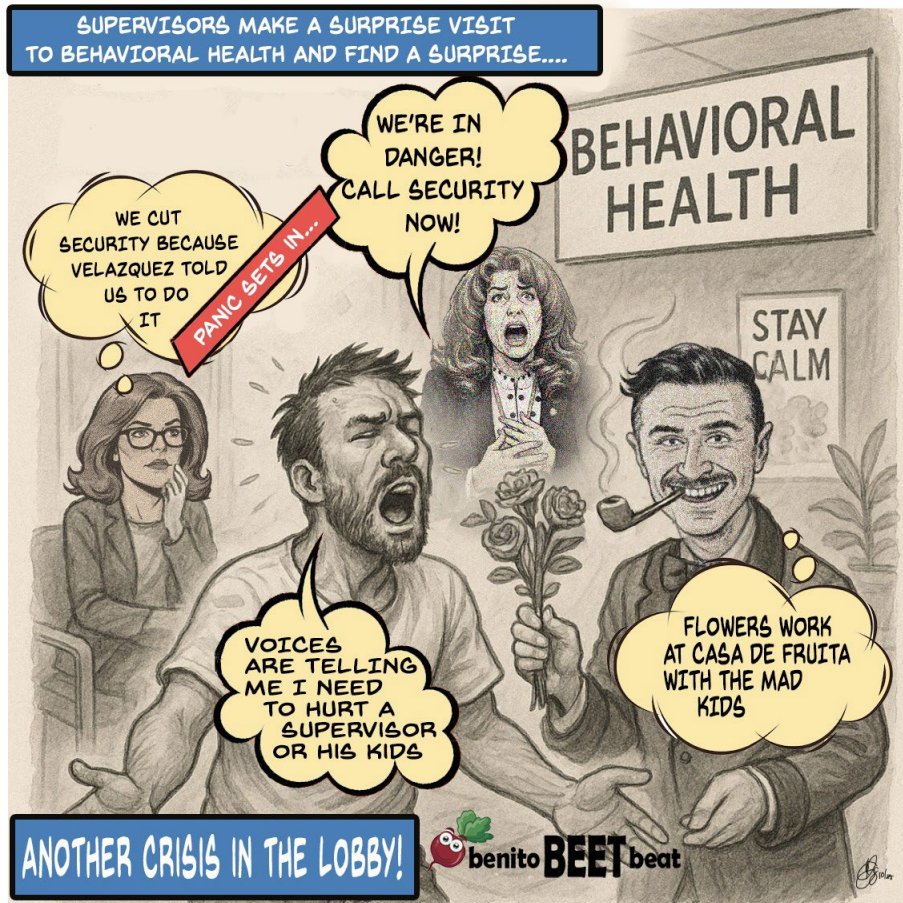
1 5. Beginning in or about June 2025, Benito Beet Beat has regularly published satirical
2 commentary on politics in San Benito County accompanied by colorful and graphic political
3 cartoons about current events in the County.

4 6. As noted in one post, “We cover the local political soap opera one eyebrow-raising
5 email, last-minute agenda item, and public comment showdown at a time. Think of us as your
6 front-row seat to the county’s favorite pastime: pretending everything’s fine while the house is
7 (allegedly) on fire.”

8 7. Benito Beet Beat, which is named in honor of San Benito County’s history of
9 growing beets, provides a source of news and opinion. Benito Beet Beat uses satire, including
10 graphic art and cartoons, to inform and educate the public about current events in San Benito
11 County, especially local government and politics. Benito Beet Beat regularly receives comments
12 and engagement from readers about its coverage.

13 8. Benito Beet Beat is published anonymously because I wish to keep the material
14 posted on it separate from my personal and professional life. Given that the content published on
15 Benito Beet Beat can be seen as provocative or offensive to powerful people or entities in San
16 Benito County, I am very concerned that others or I would experience retaliation or ostracism if
17 my identity as an author and publisher of Benito Beet Beat were revealed. These concerns are
18 especially strong given that San Benito County is a rural area with less than 65,000 people.

19 9. On or about November 3, 2025, Benito Beet Beat published a political cartoon
20 satirizing potential cuts to security staff in the County’s behavioral health clinic (“Cartoon”).
21 The Cartoon depicted an imaginary situation in which a staff member said “We’re in danger! Call
22 security now!” because a person in mental distress seeking help at the clinic said, “Voices are
23 telling me I need to hurt a supervisor or his kids!” while another staff member thought, “We cut
24 security because Velazquez told us to do it,” referring to San Benito County Supervisor Ignacio
25 Velazquez. A true and correct copy of the Cartoon is included on the following page.



10. The Cartoon was published as satirical commentary on recent events in which the San Benito County Board of Supervisors, at the urging of Supervisor Velazquez, declined to renew a company's contract to provide security at the County's behavioral health clinic, which expired on or about October 31, 2025, yet the Board failed to ensure that a new contract for security was in place, creating the risk that no security would be available at the clinic the following week.

11. Soon after publication, the Cartoon was taken down from Benito Beet Beat with an apology in an exercise of editorial discretion, but the Cartoon remains political satire, not a threat of harm or incitement to cause harm.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated November 25, 2025

/s/ J. Doe
J. Doe