ELECTRONICALLY
FILED
3/9/2022 4:52 PM
SAN LUIS OBISPO SUPERIOR COURT
By: M. Goossens,
Deputy Clerk

SANGER SWYSEN & DUNKLE
Robert M. Sanger, SBN 058214
Sarah S. Sanger, SBN 322722
222 E. Carrillo Street, Suite 300
Santa Barbara, CA 93101
Tel.: (805) 962-4887
Fax: (805) 963-7311
Email: RMSteam@sangerswysen.com

Attorneys for Defendant
Paul Ruben Flores

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SAN LUIS OBISPO

THE STATE OF CALIFORNIA,

Plaintiff,

vs.

PAUL RUBEN FLORES,

Defendant.

Case No. 21F-02402-A

DECLARATION OF SUSAN FLORES IN SUPPORT OF MOTION FOR CHANGE OF VENUE (PEN. CODE, § 1033)

Date: March 30, 2022
Time: 8:30 a.m.
Dept.: 5

Hon. Craig B. Van Rooyen

///

///

///

DocuSign Envelope ID: 75992840-9208-4407-A1C5-BD09BA8EBAD1

DECLARATION OF SUSAN FLORES

I, Susan Flores, declare:

1. I am the mother of Paul Flores and I was married to Ruben Flores, the father of Paul Flores. I have resided in the County of San Luis Obispo County since around 1992.
2. For the last 25 years, people from the San Luis Obispo County community have routinely harassed Paul, Ruben and myself because of the accusations against Paul.
3. Over the years, people would leave rocks in the front of my home in Arroyo Grande within the County of San Luis Obispo with messages painted on them. These rocks had messages like "Surrender Paul Flores," "Find Kristin Smart," "We're watching Paul Flores." Attached as Exhibits JJJJ and KKKK are true and correct photographs of some of those rocks.
4. Starting in 2008, people would often come by my house in Arroyo Grande and honk their horns. On several occasions, people would gather outside my home and one or more people would direct comments towards my house using a bullhorn. I would write down the incidents at or near the time they occurred in a log. I have reviewed the log and it accurately lists the occurrence of these incidents which occurred on or about the dates stated. Attached as Exhibit LLLL is a true and correct copy of said log.
5. In 1996 and 1997, flyers were stapled to telephone polls near my home and that of Ruben Flores in Arroyo Grande. I observed dozens of these flyers throughout San Luis Obispo County and removed them when I could. These flyers offered a reward for any information about Kristin Smart's disappearance and displayed Paul's name and photograph directly below the word "Warning." A true and correct copy of two of

DocuSign Envelope ID: 75992840-9208-4407-A1C5-BD09BA8EBAD1

these flyers, which I personally removed from public locations from within the County, are attached as Exhibits MMMM and NNNN.

6. Ruben, Paul and I have been accosted in public places. For instance, when Ruben and I were dining in a restaurant in Shell Beach, within the County of San Luis Obispo, a woman approached our table and started yelling, "You are parents of a killer!"

7. A couple of other examples are to this day available on YouTube. For instance, a group of people came to the Clark Center in Arroyo Grande where Ruben was volunteering and yelled, "Where is Kristin?" This video can be found on YouTube at https://www.youtube.com/shorts/G5Pje0DvcYw. Attached hereto as Exhibit OOOO is a true and correct copy of that video.

8. Another example from YouTube shows someone filming Paul while at the store in Arroyo Grande which was uploaded giving his location. The video can be found on YouTube at https://www.youtube.com/watch?v=_yRE25QNhZk. Attached hereto as Exhibit PPPP is a true and correct copy of that video.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on this 9th day of March, 2022 at Arroyo Grande, California.

DocuSigned by:
Susan Flores
DCF4C8B7315A4C0...
Susan Flores