

1 and capacities when the same have been ascertained. Plaintiff is informed and believes and thereon
2 alleges that each of the defendants DOES 1 through 10, inclusive, are negligently or otherwise
3 legally responsible in some manner for the events referred to in this complaint, and caused financial
4 injuries as alleged in this complaint.

5 4. Plaintiff is informed and believes and thereon alleges, that at all times herein mentioned,
6 each defendant was an agent or employee of the remaining defendants and in doing the things
7 mentioned in this complaint, was acting within the scope and course of his, her, or its authority as
8 such agent or employee with the permission of consent of each of the defendants.

9 5. Defendant Ms. Vickers has been aware at all times herein that Plaintiff worked as an
10 intern with The County of Nevada, in the Human Resources Department from June 24, 2024
11 through January 3, 2025, and that Mr. Vickers has been seeking regular employment with Nevada
12 County by applying to multiple positions in multiple departments.

13 6. Defendant Ms. Vickers and Plaintiff Mr. Vickers have been legally married since July 11,
14 1998. Defendant Ms. Vickers filed for divorce in December 2023. Defendant Ms. Vickers and
15 Plaintiff Mr. Vickers continued to engage in a romantic relationship until approximately November
16 6, 2024, when Plaintiff Mr. Vickers terminated the romantic relationship.

17 7. Since approximately September, 2024, Defendant Ms. Vickers has been employed with
18 the State of California, Department of Rehabilitation. She alternates work locations between her
19 residence at 12071 Elnora Drive, Penn Valley, CA 95946; an office at 988 McCourtney Road,
20 Grass Valley, CA 95949; and an office at 11641 Blocker Drive, Suite 125, Auburn, CA 95603.

21 8. The office at 988 McCourtney Road is a shared complex with multiple Nevada County
22 departments that fall under the Social Services department. These departments all have interactions
23 with the Nevada County Human Resources department, where Plaintiff Mr. Vickers worked as an
24 intern.

25 9. Most employees with Nevada County and the California State Department of
26 Rehabilitation are mandated reporters and must report crimes to law enforcement. Defendant Ms.
27 Vickers has worked in multiple jobs where she has been a mandated reporter and is fully aware of
28 the duties and responsibilities which come with that title.

1 10. On or about November 7, 2024 Defendant Ms. Vickers made defamatory statements
2 fabricating an assault that she accused me of to one or more mandated reporters, which resulted in
3 Plaintiff Mr. Vickers being called and questioned by law enforcement with the Nevada County
4 Sheriff's Department. This call occurred 1-2 days prior to Plaintiff Mr. Vickers interviewing for a
5 position within that department, and approximately 1-2 days after Plaintiff Mr. Vickers had
6 terminated his romantic relationship with Defendant Ms. Vickers. Defendant Ms. Vickers was
7 aware of this interview prior to making her comments. The incident described by Defendant Ms.
8 Vickers was purported to have transpired on or about June 2024, five months prior to her
9 statements. These defamatory statements did lead to an active investigation on the part of the
10 Nevada County Sheriff's Department. These statements are defamatory on their face. Each of these
11 statements were false and known by Defendants to be false when made, but were made out of
12 Defendants' vindictiveness, anger, malice, oppression, ill will, and with a willful and wanton
13 disregard for Plaintiff's rights.

14 11. On or about December 15, 2024, Defendant Ms. Vickers loudly proclaimed that Plaintiff
15 Mr. Vickers was "a rapist and abuser." These statements were made in the presence of Plaintiff Mr.
16 Vickers' minor children (William Vickers, 16; Gideon Vickers, 10; Thaddeus Vickers, 7), Plaintiff
17 Mr. Vickers' adult son (Ethan Vickers, 20), Fiona Baker, 18, and Defendant Ms. Vickers' mother
18 (Reatha Couch, 87). Ms. Couch echoed these sentiments to William Vickers, 16, at least once after
19 the incident. These statements are defamatory on their face. Each of these spoken statements were
20 false and known by Defendants to be false when made, but were made out of Defendants'
21 vindictiveness, anger, malice, oppression, ill will, and with a willful and wanton disregard for
22 Plaintiff's rights.

23 12. On or about November 11, 2024 Defendant Ms. Vickers told multiple parties, including
24 but not limited to my children and her mother, that I had committed financial fraud against her by
25 taking out a loan in her name without her signing, and that there was an active lawsuit against both
26 of us in the state of New York, and that I had intentionally hidden this information from her.
27 Defendant Ms. Vickers' Mother, Reatha Couch, repeated these defamatory statements several days
28 later, at least once, to Plaintiff Mr. Vickers' 16 year old son, William, as if they were factually true.

1 These statements are defamatory on their face. Each of these spoken statements were false and
2 known by Defendants to be false when made, but were made out of Defendants' vindictiveness,
3 anger, malice, oppression, ill will, and with a willful and wanton disregard for Plaintiff's rights.

4 13. As a proximate result of the acts of Defendants alleged above, Plaintiff was hurt and
5 injured in his health, strength and activities, and sustained injury to their nervous system and
6 person, all of which have caused and continue to cause Plaintiff's great mental, physical, and
7 nervous pain and suffering. Plaintiff is informed and believes and thereon alleges that these injuries
8 will result in some permanent disability. As a result of these injuries, Plaintiff has suffered damages
9 in an amount not yet ascertained and to be shown according to proof at the time of trial.

10 14. As a further proximate result of the acts of Defendants, Plaintiff has lost and will
11 continue to lose earnings in an unascertained amount. Plaintiff will seek to amend this complaint as
12 such a time as the amount is ascertained or according to proof at the time of trial.

13 15. As a further proximate result of the acts of Defendants, Plaintiff's present and future
14 earning capacity has been impaired. The exact amount of this loss is not known to the Plaintiff at
15 this time and Plaintiff will move to amend this complaint to state the amount when it becomes
16 known to them or according to proof at the time of trial.

17 16. As a further proximate result of the acts of Defendants, Plaintiff has incurred
18 consequential expenses and has suffered consequential losses to his reputation, household, and other
19 property to be shown according to proof at the time of trial.

20 **FIRST CAUSE OF ACTION**

21 **(DEFAMATION OF CHARACTER)**

22 Plaintiff realleges and incorporates herein as fully set forth in paragraphs 1 through 16 of the
23 general allegations.

24 17. Defendants' accusations of assault, rape, and financial fraud were false and defamatory
25 *per se*. Each defamatory statement and republication entitled Plaintiff to successive recoveries
26 against Defendants.

1 18. As a result of Defendants' false and defamatory statements regarding Plaintiff, Plaintiff
2 has been damaged specially and generally in an amount to be shown according to proof at the time
3 of trial.

4 19. Plaintiff is further entitled to recover punitive damages for Defendants' defamation of
5 character due to Defendants' malice, fraud and oppression pursuant to Civil Code Section 3294.

6 **SECOND CAUSE OF ACTION**

7 **(INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS)**

8 Plaintiff realleges and incorporates herein as fully set forth in paragraphs 1 through 19 of the
9 general allegations and the first cause of action.

10 20. In doing the acts alleged above, Defendants intended to cause or acted with a willful and
11 wanton disregard for whether or not they would cause Plaintiff severe emotional distress.
12 Defendants' conduct toward Plaintiff was extreme and outrageous.

13 21. As a result of Defendants' acts as alleged above, Plaintiff, in fact, was caused severe
14 emotional distress.

15 22. At no time did Plaintiff consent to any of the acts of the Defendant as alleged above.

16 23. The aforementioned conduct was intentional, malicious, and oppressive and done for the
17 purpose of causing injury to the Plaintiff. Plaintiff is therefore entitled to an award for punitive
18 damages pursuant to Civil Code §3294.

19 **THIRD CAUSE OF ACTION**

20 **(NEGLIGENCE)**

21 Plaintiff realleges and incorporates herein as fully set forth in paragraphs 1 through 23 of the
22 general allegations and the first and second causes of action.

23 24. Alternately, Plaintiff alleges that Defendants' conduct as previously alleged resulted
24 from Defendants' neglect and failure to act reasonably, and without consent or privilege.

25 25. As a result of Defendants' negligent conduct, Plaintiff was injured physically and
26 emotionally, entitling him to recover general and special damages in an amount to be shown at the
27 time of trial.

1
2 WHEREFORE, Plaintiff prays for judgement against Defendants and each of them as
3 follows:

- 4 1. For general damages according to proof;
- 5 2. For medical and psychological expenses incurred by Plaintiff according to proof;
- 6 3. For past and future lost income and employment according to proof;
- 7 4. For consequential damages according to proof;
- 8 5. For damages for each *per se* false defamatory statement;
- 9 6. For an injunction preventing future false defamatory statements;
- 10 7. For punitive damages pursuant to statute for each intentional cause of action as permitted
11 by Civil Code Section 3294;
- 12 8. For attorney fees and costs according to statute;
- 13 9. For such other and further relief as the court deems just and proper.

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15 DATED: January 19, 2025

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MATTHEW WILLIAM VICKERS
In Pro Per
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VERIFICATION

I, the undersigned, say:

I am the Plaintiff in the above-entitled action.

The above VERIFIED COMPLAINT FOR DAMAGES FOR DEFAMATION;
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS; AND NEGLIGENCE is true of my
own knowledge, except as to those matters that are stated on my information and belief, and as to
those matters, I believe it to be true.

I declare under penalty of perjury under the laws of the State of California, that the
foregoing is true and correct.

Executed on this 21st day of June, 2023, at Penn Valley, California.



MATTHEW WILLIAM VICKERS