

**FILED**

BY SUPERIOR COURT OF CALIFORNIA,  
COUNTY OF NEVADA

11/25/2025

LAILA A. WAHEED, CLERK OF THE COURT  
SCOTT SHAPIRO, DEPUTY

1 MATTHEW WILLIAM VICKERS  
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7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
8 **IN AND FOR THE COUNTY OF NEVADA**  
9

10 MATTHEW WILLIAM VICKERS

11 Plaintiff,

12 vs.

13 ETHAN OLIVER RALPH, and DOES 1 - 10

14 Defendant.  
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) Case No.: CU0002489

) **VERIFIED COMPLAINT FOR DAMAGES**  
) **FOR DEFAMATION OF CHARACTER**  
) **AND NEGLIGENCE**

19 Plaintiff MATTHEW WILLIAM VICKERS (“Vickers”) alleges as follows:

20 **GENERAL ALLEGATIONS**

21 1. Defendant ETHAN OLIVER RALPH (“Ralph”) was and at all times herein mentioned is  
22 an individual conducting business online, self-employed, as an internet talk show host, with an  
23 audience included in the State of California.

24 2. Except where otherwise alleged, all events, transactions and occurrences alleged herein  
25 occurred in Nevada County, California.

26 3. The true names and capacities, whether individual, corporate or associate or otherwise of  
27 Defendants DOES 1 through 10, inclusive, are unknown to plaintiff who, therefore, sues said  
28 defendants by such fictitious names. Plaintiff will amend this complaint to show their true names

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 time 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. Since at least July 1, 2020, Defendant Ralph has earned his living hosting an online talk  
10 show called "The Killstream." On occasion he has also hosted another online talk show called  
11 "Tequila Sunrise." Defendant Ralph, during any of these shows, has between a few hundred, to a  
12 few thousand live viewers, and additional viewers who watch the show after it has aired live.  
13 During this time, he has broadcast his show from various platforms including DLive.tv,  
14 Odysee.com, Rumble.com, Kick.com, and Cozy.tv. Additionally, Defendant Ralph has a public  
15 Twitter account (username @TheRalphRetort) which had over 100,000 at the time of this  
16 complaint.

17 6. On August 18, 2022 Plaintiff Vickers filed an OSC against Defendant Ralph as a result of  
18 repetitive demeaning, slanderous, contemptuous, defamatory, and embarrassing comments over the  
19 internet exposed to the world through the internet through media and written messages and podcasts  
20 between August 2022 through May 2023. Following a held at Nevada County Superior Court on  
21 May 26, 2023 and concluding on May 31, 2023 Defendant Ralph was found guilty of violating the  
22 Stipulation and Order three (3) times.

23 7. On June 22, 2023 Plaintiff Vickers filed an Unlimited Civil Lawsuit against Defendant  
24 Ralph for defamation per se, negligence, and intentional infliction of emotional distress (California  
25 Superior Court, County of Nevada Case No. CU0000787). The case was dismissed on May 28,  
26 2024 at the request of Plaintiff Vickers due to hardships that, at the time, made the case difficult to  
27 continue, and after conversations with Defendant Ralph which seemed to indicate that Defendant  
28 Ralph would not continue his habitual defamatory tendencies.

1 8. On November 19, 2025, Defendant Ralph published defamatory statements on his X  
2 (formerly Twitter) account stating that Plaintiff Vickers was a rapist.

3 9. On November 20, 2025, Defendant Ralph posted a video to his X account. The video was  
4 over eight (8) minutes long and included multiple defamatory statements (including calling Plaintiff  
5 Vickers a rapist and suggesting that Plaintiff Vickers was actively attempting to kill his ex-wife).  
6 Defendant Ralph knew the statements were untrue, said the statements with negligence, malice, and  
7 the express purpose of harming Plaintiff Vickers.

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

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

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

18 **FIRST CAUSE OF ACTION**

19 **(DEFAMATION OF CHARACTER)**

20 Plaintiff realleges and incorporates herein as fully set forth in paragraphs 1 through 12 of the  
21 general allegations.

22 13. Defendants' publications on the internet alleging acts of rape, abuse, and planned murder  
23 were false and defamatory *per se*. Each defamatory statement and republication entitled Plaintiff to  
24 successive recoveries against Defendants.

25 14. As a result of Defendants' false and defamatory reports regarding Plaintiff, Plaintiff has  
26 been damaged specially and generally in an amount to be shown according to proof at the time of  
27 trial.

28

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

3 **SECOND CAUSE OF ACTION**

4 **(NEGLIGENCE)**

5 Plaintiff realleges and incorporates herein as fully set forth in paragraphs 1 through 15 of the  
6 general allegations and the first and second causes of action.

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

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

12  
13 WHEREFORE, Plaintiff prays for judgement against Defendants and each of them as  
14 follows:

- 15 1. For general damages according to proof;
- 16 2. For past and future lost income and business according to proof;
- 17 3. For consequential damages according to proof;
- 18 4. For damages for each publication of a *per se* false defamatory statement;
- 19 5. For an injunction preventing future publication of false defamatory statements;
- 20 6. For punitive damages pursuant to statute for each intentional cause of action as permitted  
21 by Civil Code Section 3294;
- 22 7. For attorney fees and costs according to statute;
- 23 8. For such other and further relief as the court deems just and proper.

24 DATED: November 25, 2025



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27 MATTHEW WILLIAM VICKERS  
In Pro Per

**VERIFICATION**

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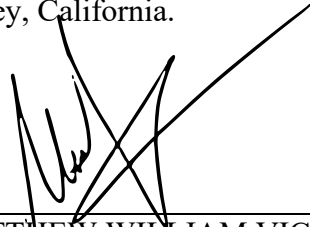
I, the undersigned, say:

I am the Plaintiff in the above-entitled action.

The above VERIFIED COMPLAINT FOR DAMAGES FOR DEFAMATION;  
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 25th day of November, 2025, at Penn Valley, California.

  
\_\_\_\_\_  
MATTHEW WILLIAM VICKERS