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FILED

BY SUPERIOR COURT OF CALIFORNIA,
COUNTY OF NEVADA

02/01/2023

JASON IL GALKIN, CLERK OF THE COURT
ANGELA AVINA, DEPUTY

8 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 IN AND FOR THE COUNTY OF NEVADA

10
11 FAITH VICKERS

12 Petitioner,

13 vs.

14 ETHAN RALPH

15 Respondent.
16

Case No. FL21-016680

OPPOSITION TO PETITIONER'S
DECLARATION RE CONTEMPT

Date: February 8, 2023

Time: 9:00 a.m.

Dept. : 3

17
18 Respondent, Ethan Ralph, hereby opposes Petitioner's Declaration re Contempt filed on
19 December 19, 2022. The Declaration re Contempt purports to show that Respondent has
20 violated the Stipulation and Order entered into by the parties and filed with the Court on
21 September 12, 2022, and the Domestic Violence Restraining Order dated March 2, 2022.

22 The matter is set for hearing before the court on February 8, 2023, at 9:00 a.m., in
23 Department 3 of the above-entitled Court.

24 Attached hereto is Responsive Declaration Denying Contempt Allegations.

25
26 Dated: February 1, 2023

27 
JENNIFER GRANGER
Attorney for Respondent, ETHAN RALPH
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1 **RESPONSE TO ALLEGATIONS OF “TWITTER VIOLATIONS”**

2 In Response to Exhibits 1-8: Most of the quoted “tweets” are from 2021 which pre-dates
3 either the stipulation or the permanent domestic violence restraining order. These statements
4 were purported to have been made by Mr. Ralph, before either order was in place, were not sent
5 directly to Ms. Vickers, but were broadcast purportedly to the “followers” of Mr. Ralph. At
6 page 1, line 16-17, of Ms. Vickers’ declaration, she claims that the statements are “clearly meant
7 to instigate harassment of me by weaponizing his followers with false narratives.” That is
8 speculative. There is no evidence to support this claim made by Ms. Vickers.

9 In summary, Exhibits 1-8 were not sent directly to Ms. Vickers, but purportedly out to
10 some group of followers of Mr. Ralph. There is no evidence that the sender sent them to Ms.
11 Vickers, or anyone other than the alleged “followers.” If Ms. Vickers signs up to receive
12 messages sent by Mr. Ralph to his “followers” thereby intentionally inserting herself into that
13 arena, she cannot now claim Mr. Ralph intended to cause her harm.

14 **RESPONSE TO ALLEGATION OF “EMAIL LEAK VIOLATION”**

15 Ms. Vickers is attempting to re-litigate issues that occurred two years ago. She re-hashes
16 events that occurred in Richmond, Virginia before a restraining order was even in place. The
17 information is irrelevant and stale.

18 There is a long-standing feud between Mr. Ralph, Ms. Vickers, Mr. Matthew Vickers,
19 Faith’s father, and Mr. Ralph’s current partner Amanda Morris. Lies and false accusations have
20 been trumpeted over social media by Ms. Vickers for years. (See Exhibit A, Attached
21 Declaration of Amanda Morris.)

22 In response to Exhibit 9- Ms. Vickers purports to claim that a post dated 10/07/2021 was
23 posted by Ethan Ralph though there is a lack of foundation to support that assertion. It also
24 fails to establish any violation of a court order.

25 **RESPONSE TO ALLEGATION OF NO CONTACT VIOLATION**

26 Ms. Vickers’ claim as to the wrongful intent behind the reason for the call made is pure
27 speculation on her part. There was no willful disobedience of a court order supported by
28 evidence. (See *Anderson v. Superior Court* (1998) 68 Cal.App. 4th 1240, 1245.)

1 On July 24, 2022, the parties were allowed to communicate in order to discuss issues
2 pertaining to parenting of their son. There are no facts to support Mr. Ralph willfully disobeyed
3 the court order.

4 **RESPONSE TO ALLEGATION OF HARASSMENT RE: GO FUNDRAISER**

5 Petitioners attached Exhibit 12 screen shot of Mr. Ralph includes dialog that speaks for
6 itself. It does not include the disparaging statements claimed by Ms. Vickers. There is also no
7 naming of Ms. Vickers herself.

8 There is no evidence to support that anyone who saw this post on GoFundMe knew that
9 the “mother of his son” was Faith Vickers so it cannot constitute willful disobedience of a court
10 order.

11 **THE JOURNAL**

12 Again, Ms. Vickers refers to matters that occurred prior to the orders at issue in this
13 contempt. On page 4, lines 8-10, Ms. Vickers explained that Mr. Ralph’s attorney cooperated
14 with the deputy district attorney to deliver Ms. Vicker’s property to her. Mr. Ralph has
15 repeatedly asserted that he is not in possession of Ms. Vicker’s journal.

16 At page 4, lines 11-28 are pure speculation and not relevant to the proceedings, as they
17 largely involve the purported intentions of an individual named Ethan Josiah Hatchett.

18 Finally, at page 4, lines 18-19, Ms. Vickers writes that she “convinced Mr. Hatchett to
19 return the journal via mail.”

20 The parties met at Family Court Services with recommending counselor Jane Lee on
21 January 3, 2023. In the status report, Ms. Vickers claims that Mr. Ralph continues to have her
22 journal and uses it in some way to encourage his “followers” to show up at her house and
23 threaten her and her family. Yet she admits that she states under penalty of perjury that she
24 received the journal from Mr. Hatchett. Ms. Vickers’ allegations are not reliable, confusing,
25 and seem to involve a fantasy world of her own making.

26 **ABUSE OF TALKING PARENTS APP - NO CONTACT VIOLATIONS**

27 As this court is well aware, the talking parents application is to be utilized in high-
28 conflict custodial cases where the parents have difficulty communicating about parenting issues.

1 Some of the messages express Mr. Ralph's frustration with Ms. Vickers lack of
2 communication with Mr. Ralph regarding parenting issues. To borrow a term of art employed
3 by Ms. Vickers, she has "weaponized" communications between herself and Mr. Ralph by
4 having her father discuss their parenting issues on social media through his broadcasting his
5 "The Vicious Mr. Vickers" on social media. Her father, Matthew Vickers, broadcasts on social
6 media daily communications to his "followers" wherein he discusses and offers opinions on a
7 range of topics, including the dysfunctional relationship between Mr. Ralph and his daughter.
8 When Mr. Ralph attempts to discuss a parenting issue with Ms. Vickers, the same topic will
9 appear almost simultaneously in a "Vicious Vickers" report with snarky comments made by
10 Matthew Vickers, which is hardly promoting peaceful communication between the parties. This
11 undermines co-parenting, undermines trust, and makes it very difficult for these parties to co-
12 parent.

13 The Talking parents messages also reveal that Ms. Vickers believes that she can control
14 every aspect of the parenting, and refuses to engage in dialog with Mr. Ralph. For example,
15 page 7, lines 15-16 of Ms. Vicker's included Talking Parents communication. She states that
16 she wrote, "[p]lease no longer contact me unless it is in regards to agreeing to visitations going
17 forward. I will be in communications with your attorney going forward." This is an example of
18 the kind of "passive-aggressive" comments made throughout these posts. Ms. Vickers refuses
19 to engage with Mr. Ralph to co-parent their son. Mr. Ralph was upset because Ms. Vickers
20 would not allow him to take any photos of the son - which was not prohibited by any court
21 order- and then she refuses to discuss the matter: she just makes demands.

22 These parents will need to parent their child for the rest of their lives; they both need to
23 learn how to cooperate and communicate about their son.

24 There has been no willful violation of court orders in these communications by Mr.
25 Ralph. The dialog speaks for itself.

26 **RESPONSE TO ALLEGATION OF MISREPRESENTATIONS MADE TO CENTER**

27 This is speculation and not evidence of any violation of the court orders. It appears to be
28 a communication between Mr. Ralph and the supervised visitation center asking for clarification

1 about whether visits can proceed. There is no violation of any order supported by this message.

2 **RESPONSE TO ALLEGED VIOLATIONS OF STIPULATION AND ORDER**

3 Mr. Ralph does not deny that he agreed to return any of the items of Ms. Vickers that he
4 has in his possession. He looked for items that she wanted returned and explained that he is not
5 in possession of the items. If he were, he would gladly return them to her. He is not continuing
6 "to refuse" as Ms. Vickers asserts, as he is not in possession of the items.

7 **FAITH VICKERS VIOLATIONS OF THE STIPULATION DATED 9/12/22**

8 Paragraph 16 orders that both parties shall refrain from posting or discussing the case
9 online. Ms. Vickers and her father Matthew Vickers have posted on-line on numerous
10 occasions. An example is attached Exhibit B, from October 2022, a copy of a post made by
11 Matthew Vickers wherein he announces that he will be discussing Mr. Ralph's purported
12 violation of the court order. This is a direct violation of the order that neither party is to direct a
13 third party to discuss the case online.

14 Ms. Vickers has violated the stipulation and order on numerous occasions, discussing
15 their case - child support issues, parenting issues with social media broadcasters on-line. The
16 most egregious example was on during Mr. Ralph's first supervised visit at the Parenting Place,
17 after Faith dropped off their son, she went on an on-line streaming broadcast with a man named
18 to Johnathan "Cog" Harrison on October 20, 2022. On his show, Mr. Harrison interviewed Ms.
19 Vickers for an hour and made numerous false statements, and insulting statements about me.

20 (Link: Interviewing Faith Vickers : \$3 TTS(2).mp4)

21 Relevant Timestamps:

22 14:16 min: Making allegations about Mr. Ralph "grooming" for sexual exploit;
23 18: 15 min: Disparaging comments about Mr. Ralph and his ex-wife;
24 20min: Talking about Sandra Ralph, Mr. Ralph's deceased Mother;
25 22min: Describing Mr. Ralph's alcohol intake;
26 31min: Alleging Mr. Ralph is grooming and suicide bait;
27 33min: Complaining Mr. Ralph didn't take her to get medication;
28 34:50 min: saying Mr. Ralph smells;
36:50 min: laughing about Mr. Ralph's body;
38min: Admits she was getting black out drunk;
42min: Makes disparaging comments about Mr. Ralph's body;
1:02-1:03 min: Discusses the DRVO;
1:10-1: 30 Talks about Ralph's family
1:27-1:35: More humiliating conversation about Mr. Ralph and his "problems."

1 She has also discussed child support issues on social media. Faith Vickers is violating
2 our stipulation and order "to refrain from posting or discussing the case online. Neither party
3 shall direct a third party to post or discuss the case online."

4 **CONCLUSION**

5 Ms. Vickers cannot prove that I have willfully violated either the Domestic Violence
6 Restraining Order, dated March 2, 2022, or the stipulation and agreement dated September 12,
7 2022.

8 Date: February 1, 2023

Respectfully submitted,

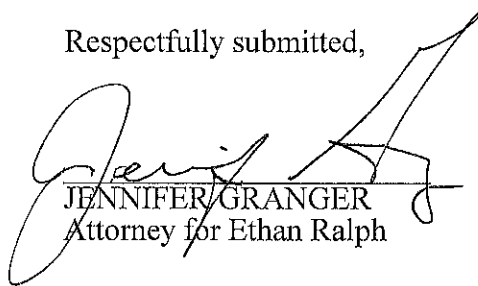
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11 JENNIFER GRANGER
12 Attorney for Ethan Ralph
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EXHIBIT A

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): JENNIFER M. GRANGER 172745 LAW OFFICE OF JENNIFER M. GRANGER P.O. BOX 2514 NEVADA CITY, CA 95959 TELEPHONE NO.: (530) 470-0328 FAX NO. (Optional): (530) 264-7752 E-MAIL ADDRESS (Optional): jmgrangerlawoffice@gmail.com ATTORNEY FOR (Name):	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF NEVADA STREET ADDRESS: 201 CHURCH STREET MAILING ADDRESS: 201 CHURCH STREET CITY AND ZIP CODE: NEVADA CITY, CA 95959 BRANCH NAME:	
PLAINTIFF/PETITIONER: FAITH VICKERS DEFENDANT/RESPONDENT: ETHAN RALPH	
DECLARATION	CASE NUMBER: FL21-016680

See Attached Delcaration of Amanda Morris

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

Date:

(TYPE OR PRINT NAME)

(SIGNATURE OF DECLARANT)

☐ Attorney for ☐ Plaintiff ☐ Petitioner ☐ Defendant
☐ Respondent ☐ Other (Specify):

Ms. Vickers and I were friends in the summer and fall of 2020 and frequently talked over text messages. I became romantically interested in Mr. Ralph after he discovered Ms. Vickers was unfaithful. Mr. Ralph and I had an affair that September. A day later Ralph discovered Ms. Vickers was pregnant with his child. I remained friendly with Ms. Vickers and Mr. Ralph. Both would vent to me about their relationship. We discussed the possibility of entering a polyamorous relationship where Mr. Ralph and I would support Ms. Vickers throughout her pregnancy. Ms. Vickers had told me that her father was physically and emotionally abusive and that she did not want to return home to Northern California. Ms. Vickers and Mr. Ralph were unsatisfied with their current situation, and we all agreed to move in together and signed a one-year lease for a rental home in Richmond, VA.

Ms. Vickers and I would frequently flirt and send each other nude pictures. All three of us agreed to meet up in DC in November 2020 and planned to be sexually intimate. Mr. Ralph booked a room at the AC hotel for the three of us. I flew in from Rochester, NY to DC. Mr. Ralph and Ms. Vickers met me at the airport. When we arrived at the hotel, Ms. Vickers claimed she had a headache. Mr. Ralph went out to meet a friend and I attended to Ms. Vickers. I rubbed her shoulders and bought her dinner. I asked her if she wanted to kiss, and she agreed. I respected her boundaries when she didn't feel comfortable becoming more intimate. Mr. Ralph returned later that night. He was upset that Ms. Vickers backed out of the arrangement for us three to be intimate. Ms. Vickers became confrontational and began insulting Mr. Ralph. The two began shouting at each other. I felt uncomfortable and attempted to defuse the situation. I escorted Ms. Vickers out of the room and into the stairwell. I sat with her while she cried. I encouraged her to book another hotel room so she could rest. When she stopped crying, Ms. Vickers called her parents to help her reserve another hotel room and I went back to the room to check on Mr. Ralph. That night I stayed with Ms. Vickers in her room in the Embassy Suites hotel so she wouldn't be alone. I did not hear what she told her parents over the phone that night.

The next day Mr. Ralph and I went around DC to cover the Stop the Steal protests on live stream. After we were finished filming, Mr. Ralph went over to visit Ms. Vickers in her hotel room and I went to the Yard House restaurant to wait for Mr. Ralph and meet up with some friends. Mr. Ralph and Ms. Vickers arrived at the restaurant together about an hour later. They were friendly and there was no sign of tension. That night I stayed at the AC Hotel with Mr. Ralph. He told me he had intercourse with Ms. Vickers while they were alone. The next morning, Mr. Ralph drove Ms. Vickers to the airport. I continued to text with Ms. Vickers throughout November until she began accusing me of having an affair with Mr. Ralph.

I moved into the house on 202 E 37th St with Mr. Ralph that December as per the lease agreement. Shortly after our address leaked online presumably by Ms. Vickers who had access to the lease document. As a result, our residency was swatted multiple times putting our lives in danger. Mr. Ralph continued to speak with Ms. Vickers throughout the pregnancy.

In August 2021, Mr. Ralph proposed to marry me and announced it on social media. Soon after, Ms. Vickers reopened the case against Mr. Ralph regarding the distribution of an illegal image. Ms. Vickers began defaming me and my fiancé on her Twitter account @FaithVickers01. She has called me a pedophile and a groomer and purposefully misrepresents our past interactions.

On Twitter and in a Gofundme, Ms. Vickers describes a very different account of the night in the hotel in DC. She claims she was assaulted by Mr. Ralph and fled back to the safety of her parents. This is indicative of Faith's pattern of dishonesty. Mr. Ralph did not assault Ms. Vickers. She met with Mr. Ralph in public the day after the alleged incident and Mr. Ralph drove her to the airport two days after. I have lived with him for two years and we now have our own child together, Rozanna.

In August 2022, Ms. Vickers went on a live stream hosted by well-known Australian Neo-Nazi Ryan Johnson (aka Randbot). In this interview she retells the lie of the night she left Mr. Ralph. She also laughs

at Mr. Ralph's disabled brother and attacks my character. Another individual on the live stream, Louis Jeffery Giovingo (aka Southern Dingo), claims he would "beat me like a man" if he ever saw me in public. This appearance, the personal threat of violence against me, and other online postings from Ms. Vickers has led me to fear for my family's safety and is one of the key motivators behind our move to Mexico.

Ms. Vickers also was interviewed again in October 2022 by Johnathan Harrison (aka Cog), a streamer who filmed himself and a friend assaulting Mr. Ralph in the streets of Lisbon, Portugal in May 2022. The interview took place while Mr. Ralph was visiting his son for the first time at the Parenting Time facility. She brings up intimate details about Mr. Ralph in order to humiliate him and mixes those with flat out lies to further titillate the audience. During this interview she also makes accusations that she was groomed and abused by Mr. Ralph, both untrue. Both Harrison and the aforementioned Johnson made money from viewer donations during these streams. Ms. Vickers is acting in bad faith to use the DRVO granted for her protection to gossip about the father of her child without Mr. Ralph being able to respond properly. The idea that she is in any way concerned with the privacy of her or her child is a lie conjured up for court proceedings. Her behavior shows otherwise.

My father, Harry Morris, agreed to let Mr. Ralph send mail to the address at 24 Laureen Lane in Rochester, NY. I frequently would travel back and forth from Rochester to Richmond and had kept a mailing address at 24 Laureen Lane. After we moved out of our rental home in Richmond in August 2022 we temporarily moved into an Airbnb in Merida, Mexico. The Airbnb had no mailbox and Mr. Ralph, and I had our mail sent to 24 Laureen Lane with my father's consent. After a dispute over a text message between Mr. Ralph and my younger sister that occurred on December 15th, my father claimed he had destroyed thousands of dollars' worth of merchandise sent to his home. On December 22nd my father contacted me to warn me to not speak to the police and that I may have to "throw some someone under the bus" regarding a felony.

Amanda Morris


DocuSigned by:

FA1FC986033747E... 1/6/2023

EXHIBIT B



Vicious Vickers  @ViciousVic... · 27m

Join me, @craigbob99, @Gunthunter1, and as always my faithful co-host @AkibaInsomnia tonight at 6:00PM, PST, as we discuss Fathers' Responsibilities, read and discuss the family court order, and talk about how Ralph has already violated the order.

Exhibit B