

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE

SEP 08 2023

J. Taylor

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SEP 08 2023

Guy Griffithe, In Pro Per
29061 Lupin Pl.
Canyon Lake, CA 92587

Defendant/Respondent, In Pro Per

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF RIVERSIDE**

RYAN RANDELL THOMAS, an
individual;

Plaintiff/Petitioner

vs.

GUY GRIFFITHE, an individual;

Defendants/Respondent

CASE NO. CVSW2306965
Assigned for all purposes to:
Honorable Judge James Hodgkins

**RESPONDENT GUY GRIFFITHE'S
DECLARATION IN SUPPORT OF
RESPONSE TO REQUEST FOR
RESTRAINING ORDER BY RYAN
RANDALL THOMAS**

Petition Filed: AUGUST 25, 2022

Dept.: S-101

Hearing Date: September 14, 2023

Hearing Time: 08:30AM

**RESPONDENT GUY GRIFFITHE'S DECLARATION IN SUPPORT OF RESPONSE TO
REQUEST FOR RESTRAINING ORDER BY RYAN RANDALL THOMAS**

1 I, Guy Griffithe, declare that I am at least 18 years of age, writing this declaration as to the
2 facts in this matter, and will competently testify if asked to do so.

3 1. Ryan Thomas used to date my wife's sister for a short period of time. During that time, my
4 wife and I learned that he was abusing his drinking, which was making him ill.

5 2. My and I discovered that he was going to lose his home and was not paying any of his bills.
6 My wife reached out to me, as I have been licensed as a real estate agent and lender for
7 nearly twenty-five years and we decided we needed to help Ryan. We were able to sell his
8 home, protecting his equity, my wife and I personally stepped in and packed, moved and set
9 him up with his new house.

10 3. During this time, I had to take Ryan to the hospital because he was getting very sick. It was
11 hard to watch him suffering so I insisted on taking him to the hospital. My wife and I
12 continued to facilitate his move, which was extremely difficult and stressful, being the new
13 owners and his agent were there and extremely demanding. They were demanding we turn
14 over the house, but with Ryan's health condition, it was hard to get everything done. We had
15 to hire additional help just to ensure we moved him out completely.

16 4. I have been a licensed Real Estate agent since 2005, as well as my wife, where I work
17 primarily on the lending side, she was active in the Real Estate side, therefore, listed his
18 Corona house and negotiated the purchase of his new home. He requested it be near my wife
19 and I, so he had people close to him. I believe he wanted to make sure he had friends nearby.
20 After a few months, Ryan requested that my wife help him in getting IHSS, being that my
21 wife has been a IHSS provider for eight years and I have been an IHSS provider for the last
22 two and half years, so we could be paid for providing services for him. Since Ryan was a
23 friend, we agreed that we would look after him. Due to his health condition, we were
24 concerned that not enough services were available, but we decided to extend the additional
25 care without compensation.

26 5. To help, I suggested we have a friend, Vicellous Shannon, move in with Ryan so we had
27 someone there that could help Ryan when we were not there, or able to be there. Luckily for

us and Ryan, Vicellous being there saved Ryan's life at least three times. It was also good being that Ryan had grabbed a knife and threatened to kill himself.

6. Ryan became very attached to my wife and started to tell her that he was in love with her. That made me very uncomfortable, being that my wife was bathing and having to clean his private parts, which he would joke about her touching him. I felt it was highly inappropriate that he would engage in that behavior and make my wife feel uncomfortable.

7. In or around March – April 2022, Ryan had a female staying with him for a few days. He stated that it was his girlfriend, but after conversing with her, she stated that they are not in any relationship and Ryan is lying about it. It appeared she was dealing with some stuff and had to leave her living situation quickly, so she did have any clothes. My wife brought her an outfit. I only spoke with her a couple times, then she was gone. She reappeared around the holidays, which was a bit concerning being that Ryan started to decline again once she came and left.

8. Myself, my wife and Vicellous tried to do everything we could to be supportive and be there for him. He was very difficult as he just wanted to lay on the couch, watch tv, drink his rum and smoke all day until he passed out. It has always been a challenge to care for him, but because we all care for him, we collectively did our best to make sure he was taken care of. Ryan could be verbally abusive to Vicellous but was mostly always good with my wife and I.

9. It became a bit uncomfortable when learning that Danielle and Vicellous were sleeping with one another, especially knowing how Ryan felt about her. It was not my place to get involved, but I was very concerned that he gave her \$14,000.00 to pay off her truck, knowing he was getting low on money and didn't have any income coming in. My wife did everything she could to converse with attorneys to help him with perminate disability. Ryan simply refused to get better so we could work again. Ryan, only being 47, is throwing his life away, when we already showed him that he can get better. It is very heartening to see him not care about himself.

1 10. I was shocked and upset that my wife was being accused of sending money through zelle or
2 taking money from the store as cashback. We keep extremely tight records on all
3 transactions, log them in a ledger with receipts, and she would go over them with him. He
4 drinks daily and lies constantly. When he called and accused her, I was in the car, and we
5 were both taken back by his allegations. She sat with him and told him that I needed to be
6 reimbursed for all the out-of-pocket expenses we had paid for him. She wasn't concerned
7 when she was buying or paying for all the out-of-pocket expenses because we knew he would
8 pay us back. The countless times he asked for his rum and couple packs of smokes definitely
9 added up, most of which we didn't even account for. When he lied to Danielle and didn't
10 want to tell her that not only, we discussed this, but my wife sat with him while he sent her
11 the reimbursement, which not thinking about it is heartbreaking to say the least. I feel like
12 he is betraying the people who have looked out for him to ensure he is protected and safe,
13 just to try and keep Danielle around.

14 11. My wife made sure she showed him all of the ledgers and receipts again for the \$2,000
15 reimbursement. In spite that, he would tell us both that everything is resolved but go behind
16 our back and still accuse us to Danielle. So, my wife sent him back the money as it was not
17 worth going through this. She decided she would rather take the loss than be accused or
18 treated this way.

19 12. Shortly after that, Vicellous came and admitted to my wife and I that he was the one taking
20 money, to the tune of \$5,000. I decided that I would sit with Ryan and Vicellous and work
21 on a payback for this. They agreed to draft an agreement for the repayment. This is the same
22 allegations in Ryan's request that has nothing to do with myself nor my wife.

23 13. When the issue of the Amazon charges came up, at the time I had no idea what was going
24 on and why my name was being brought up, or how, if any, it was related to me. My wife
25 previously had a client, where she would order things for them through her amazon account,
26 then they went and disputed an item, causing a chargeback without her knowing, which
27 closed her amazon account. I had an account, but I never used it, so I let my wife use it to

1 continue ordering things for her clients, as they are primarily adults with special needs, and
2 cannot manage that type of stuff themselves. She would order items for Ryan as well, where
3 each of the clients would have their card on file with amazon, when she would order and
4 ship to them, it would show up under their name and address. Ryan living around the corner,
5 she would have his stuff shipped to our house so she can make sure she got it and take it
6 over there. This was because packages have come up missing at his home. What no one
7 knew was that because she had his items go to our house, things that she ordered and sent to
8 our house at times had his card as default under our shipping address. When I started hearing
9 about this, I decided to investigate, went through, and audited the entire account, informed
10 both Ryan and my wife of the amount and how it happened so it could be corrected, and she
11 reimbursed for those charges. It was an honest mistake, but once brought to our attention, I
12 was able to figure out what was going on and get everyone whole, and on the same page,
13 preventing the issue from reoccurring.

14 14. I found out through Vicellous that he was overhearing Ryan on speaker with his hockey
15 friends stating I was stealing from him. My wife called me on three way with Ryan, where I
16 went over the amazon charges but also informed Ryan that I heard he was telling people
17 false statements that are disparaging me. I told Ryan that if I hear he is continuing to slander
18 or defame me, I will have no choice but to file a defamation suit against him. I requested
19 that Ryan let Danielle know as well, (being that I have spoken to her but a couple times in
20 March – April of 2022, nor have any contact with her”), so they don’t spread false lies about
21 me. Vicellous was on Ryan’s side of the phone call, and he heard the entire conversation.

22 15. Vicellous informed us that he heard Ryan making false statements to Danielle regarding
23 what my I stated, and he stepped in and informed Danielle that I never stated I was going to
24 “press charges” or do anything related to her, only stated that I requested they both not
25 disparage him or make false statements, and if I hear they are, I will file a defamation suit.
26 Even with Vicellous informing her of this, she stated to Vicellous that they will just see what
27 the court says, if it is denied so be it. They filed these restraining orders knowing the

1 information was false but did so anyways to hurt us.

2 16. My wife called and told me she went over to Ryan's, which he informed her that Danielle
3 had him block my wife's number, and she took him to the court, we decided that we could
4 no longer help him. Ryan said he would unblock my wife, but at that point my wife and felt
5 there was nothing we could do, so we ceased any communication with them. I have never
6 threatened Ryan or Danielle, nor has my wife. We have gone out of our way to help him and
7 remain very concerned regarding his wellbeing but having decided to discontinue our
8 relationship with him, we determined that it was not in our best interest to be associated with
9 what was going on.

10 17. What is more concerning, Ryan and Danielle have both filed these frivolous allegations,
11 knowing they are completely false. This is of concern because I have been a victim of real
12 violence, threats, which have led to me obtaining a Restraining Order, a Criminal Protective
13 Order and the Riverside District Attorney filing Felony charges against the party. Ryan is
14 aware of this, and he knows that such a false claim, if resulted in a restraining order, could
15 restrict our ability to have even the basic protection, knowing the party we have a restraining
16 order against has violated it more the thirteen times. This has and continues to put our family
17 in fear for our safety. This frivolous action could result in harm to our family.

18 **Exhibits Attached as follows:**

- 19 A. Complete Text Communications Between Guy Griffithe and Ryan Thomas. Last text
20 Communication was on August 7, 2023, and prior communication was on July 4, 2022.
- 21 B. Text communication between Guy Griffithe, Valerie Spencer and Vicellous Shannon.
22 from October 2022, current. Discussions re: Ryan health and drinking issues, concerns
related to Danielle.
- 23 C. Text communications where Vicellous states Danielle is worried that he is threatening
24 to expose her to her boyfriend and worries he will ruin her life. (Not Guy Griffithe or
Valerie Spencer). Danielle harasses Vicellous and does not leave him alone.
- 25 D. Text communications between Valerie, Guy and Vicellous regarding issues concerning
26 Ryan and Danielle. Text between Valerie and Danielle, and text communications
27 between Vicellous and Danielle regarding Ryan.

1 I declare that under penalty of perjury under the laws of the state of California, the foregoing
2 is true and correct.
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4 Dated: September 5, 2023.

5 By:  /s/ Guy Griffithe
6 Guy Griffithe, Pro Per Respondent/Defendant
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