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IN THE CIRCUIT COURT OF GARLAND COUNTY, ARKANSAS
CIVIL DIVISION

JONATHAN LEE RICHES,	)	Case No.: To be assigned by the Clerk
	)	
Plaintiff,	)	**COMPLAINT AND**
	)	**DEMAND FOR JURY TRIAL**
v.	)	
	)	
JAIME T. PHILLIPS,	)	
	)	
Defendant.	)	

Plaintiff Jonathan Lee Riches, proceeding pro se, files this Complaint against Defendant Jaime T. Phillips and alleges as follows:

NATURE OF THE ACTION

1. This action arises from Defendant's false statements accusing Plaintiff of violent crimes, made to the *New York Post*, posted on the social-media platform X, and made to a Pasco County, Florida deputy sheriff; from Defendant's unauthorized access to Plaintiff's email account; from Defendant's keeping of Plaintiff's X earnings that were paid into her payment account after the parties separated; and from Defendant's withdrawal and retention of $30,000 of Plaintiff's money.

2. Except for Counts IX and X, which are based on Defendant's February 1, 2026 statements to a deputy of the Pasco County Sheriff's Office about September 6–7, 2025, no claim in this Complaint is based on any statement Defendant made to law enforcement, to an emergency dispatcher, or in any court filing. Plaintiff refers to Defendant's recorded statements to dispatchers only as evidence that her other statements are false and that she knew they were false.

PARTIES

3. Plaintiff Jonathan Lee Riches is an individual who resides at 9713 Baxley Lane, Port Richey, Pasco County, Florida 34668. Plaintiff publishes video content under the name "JLR Investigates."

4. Defendant Jaime T. Phillips is an individual who resides in Hot Springs, Garland County, Arkansas.

JURISDICTION AND VENUE

5. This Court has subject-matter jurisdiction over this civil action. Circuit courts are the trial courts of original jurisdiction of all justiciable matters not otherwise assigned by the Arkansas Constitution. Ark. Const. amend. 80, § 6(A).

6. This Court has personal jurisdiction over Defendant because she resides in Garland County, Arkansas.

7. Venue is proper in Garland County under Ark. Code Ann. § 16-60-101(a) because a substantial part of the events giving rise to the claims occurred in Garland County, including Defendant's access to Plaintiff's email account from a device located in Hot Springs, Arkansas, and, upon information and belief, Defendant's publication of the statements at issue from her residence in Hot Springs.

FACTUAL ALLEGATIONS

A. The Parties

8. Plaintiff and Defendant were in a relationship and lived together in Pasco County, Florida. The parties are not married. The relationship ended on December 24, 2025.

9. Plaintiff paid Defendant a salary of $3,000 per month.

10. On March 30, 2026, the Circuit Court of Garland County, Arkansas entered an Agreed Order in *Phillips v. Riches*, No. 26DR-26-51.

B. December 24–25, 2025: Leavenworth, Washington

11. In December 2025, Plaintiff and Defendant traveled to Washington State for Christmas. They stayed at the All Seasons River Inn, 8751 Icicle Road, Leavenworth,

Washington, in a unit called the Shenandoah Room, and drove a rental car obtained at the Seattle airport.

12. At approximately 11:00 p.m. on December 24, 2025, Defendant, who had been consuming alcohol, awakened Plaintiff by yelling at him and striking him, and accused him of infidelity.

13. Plaintiff gathered his belongings and left the inn. In doing so, he took Defendant's phone with him by accident and left his work phone behind in the room. When Plaintiff left, Defendant was not bleeding.

14. Plaintiff did not hit Defendant, did not break her nose, did not strangle her, did not leave her unconscious, and did not hold her against her will.

15. The bedding in the Shenandoah Room was all white. There was no blood anywhere on the bed. The only blood in the room was one small drop on the side table and a single drip running down the side of a wall in the bathroom. No blood was present anywhere between those two locations, and the room showed no evidence of substantial bleeding.

16. At approximately 6:00 a.m. on December 25, 2025, about seven hours after Plaintiff left, Defendant used Plaintiff's work phone to take a photograph of herself. The photograph depicts a small red mark consistent with a scratch. It does not depict a black eye.

17. Approximately twenty-four hours later, after Defendant had returned to Pasco County, Florida, Defendant displayed extensive bruising surrounding one eye, extending along the side of her nose to the corner of that eye.

18. Upon information and belief, the bruising that appeared after Defendant left Washington was not caused by Plaintiff.

C. Defendant's Own Recorded Statements

19. Beginning December 25, 2025, Defendant made a series of recorded calls to emergency dispatch and sheriff's offices. Recordings of these calls were later obtained through public-records requests and published online. As stated in paragraph 2, Plaintiff does not base any claim on these calls. Plaintiff relies on them because Defendant's own recorded words

contradict the public statements on which this action is based.

20. **December 25, 2025 911 call (RiverCom Dispatch, Chelan County, Washington).** At approximately 9:00 a.m. on December 25, 2025, Defendant called 911 from the All Seasons River Inn using Plaintiff's work phone. She told the operator, in substance:

> "I had a fight with my boyfriend last night and he hurt me and left and took my phone."
> "He hit me and my nose is hurt."
> "All I know is I'm stuck here now against my will, basically. This is kidnapping, if you ask me."

21. In the same call, Defendant told the operator that her nose "was bleeding earlier," that after the fight Plaintiff "left and I went to bed," that Plaintiff had texted her that he was taking her phone to the sheriff's department, and that she had told him, "you left your phone here."

22. When Defendant placed that call, Plaintiff had been absent for approximately ten hours. Plaintiff left the inn before any law enforcement officer or dispatcher had been contacted. Defendant was not confined. She was in her own room at the inn and had the use of a telephone.

23. **Follow-up call to RiverCom Dispatch.** In the days after December 25, 2025, Defendant made several follow-up calls to RiverCom Dispatch about Chelan County Sheriff's Office case number 25C12789. In one of those calls, made the day she left Washington, she said, in substance:

> "[T]he reason I called this morning is because he had texted my phone and he said, I'm in trouble. What did you do?"
> "I had to get a new phone because my phone was stolen as part of a crime."

24. In the same call, the dispatcher asked whether the text from Plaintiff came to her new number, and Defendant said yes.

25. Plaintiff did not text Defendant's new number. Defendant had gotten the new phone that same day, and Plaintiff did not have the number. Defendant's phone was not stolen. As Defendant herself had told the 911 operator, Plaintiff took it by accident and told her he

was turning it in to the sheriff's department.

26. Defendant's new phone number is the same phone number that was later added, without Plaintiff's authorization, to Plaintiff's Google account described in Section G below. Plaintiff did not have that number and did not add it.

27. While at the airport, Defendant told RiverCom Dispatch, "I think they're trying to arrest my boyfriend," and asked whether the deputies could tell her if he had "been picked up." No dispatcher or deputy told her that a warrant had been issued for Plaintiff.

28. **February 1, 2026 calls to the Pasco County Sheriff's Office.** On February 1, 2026, at approximately 1:12 p.m., Defendant, from Hot Springs, Arkansas, called the Pasco County, Florida Sheriff's Office communications center. She said, in substance:

> "[W]e went on vacation to Washington State for Christmas. And while we were there, he assaulted me and broke my nose."
> "[H]e shattered my nose and septum. There was blood everywhere . . . . And I believe he left me unconscious there."

29. In the same call, Defendant said, in substance, that Plaintiff "went on the run to avoid being arrested" and that "they had warrants out for him for felony assault." No warrant had been issued for Plaintiff, and no law enforcement officer had told Defendant that one had.

30. At approximately 1:42 p.m. the same day, Defendant told the Pasco County call-taker, in substance: "He's pending a criminal case. Like, his case in Washington is very, very serious. . . . And they told me that they intend to extradite him." Upon information and belief, no criminal charge has been filed against Plaintiff in Washington State and no warrant for Plaintiff's arrest has been issued there.

D. Defendant's Statements to the *New York Post*

31. On March 20, 2026, the *New York Post* published an article by Megan Palin and Andy Tillett titled "There's one case true crime YouTuber JLR Investigates isn't covering: Ex's allegations he beat and strangled her" (the "Article"). The Article names Plaintiff throughout.

32. On March 21, 2026, Defendant posted on X, from her account @MagnoliaXRio: "The NY Post reached out to me yesterday and I answered some of the questions they had for the story." (https://x.com/MagnoliaXRio/status/2035391682393379261.) In the same post she wrote that she was "obviously aware that the Chelan County domestic violence police report from Christmas Day, and my protection order case, have come to light." According to X's view count, the post has been viewed more than 98,000 times.

33. The Article published photographs credited "Courtesy of Jaime Tennille Phillips." Their captions state:

> "Jaime Tennille Phillips dated Riches from 2023 until an explosive fight over Christmas last year in Washington state, which she says left her with serious injuries."
> "Phillips claimed she helped Riches turn his life around and build up his YouTube channel, but he was frequently abusive toward her."

34. Upon information and belief, Defendant made these statements to the *New York Post* when she answered its questions on or about March 20, 2026, and supplied the photographs for publication with them: that the Christmas 2025 fight in Washington left her with serious injuries, and that Plaintiff was frequently abusive toward her (the "*Post* Statements").

35. The Article separately describes allegations from a petition Defendant filed in court. Plaintiff does not base any claim on statements in Defendant's court filings.

E. Defendant's Posts on X

36. Defendant publishes on X under the username @MagnoliaXRio and the display name "Magnolia." The account links to the YouTube channel @MagnoliaInvestigates and has more than 6,000 followers.

37. **August 30, 2026 post.** On August 30, 2026, Defendant posted on X (https://x.com/MagnoliaXRio/status/2094130885688013053) the following, in part:

> "It's not 'just DV.' It's like the police told me in the ER in Washington - 'dirtbag psychopaths' who beat women never plateau. They only escalate over time. This is why so many of them end up as cold-blooded killers in

the end. They have no regard for human life."

38. According to X's view count, the August 30, 2026 post has been viewed more than 14,000 times.

39. **September 2, 2026 post.** On September 2, 2026, Defendant posted on X (https://x.com/MagnoliaXRio/status/2095149216784154977) the following, in part:

> "It's so crazy how violent psychopaths think they're so big and bad when they're brutally assaulting and punching a tiny woman in the face, but suddenly they're cowardly little bitches when the police come knocking and will hide under tables and even drive cross-country to avoid . . . ."

40. According to X's view count, the September 2, 2026 post has been viewed more than 6,000 times.

41. Readers of the August 30 and September 2, 2026 posts understood them to refer to Plaintiff. Through her March 21, 2026 post and the Article, Defendant had told her audience that she was the complainant in the Chelan County domestic violence report from Christmas Day 2025, and the Article identified Plaintiff by name as the man she accused. Plaintiff is the only person Defendant has accused of injuring her in Washington. The August 30 post refers to "the ER in Washington." The September 2 post refers to a man who left to avoid the police, and the Article reported that the Chelan County Sheriff's Office said Plaintiff had left the state.

42. The August 30, 2026 post and the September 2, 2026 post (together, the "X Posts") state as fact that Plaintiff beat Defendant. The September 2, 2026 post further states as fact that Plaintiff punched Defendant in the face and fled to avoid the police.

F. The Statements Are False, and Defendant Knew They Were False

43. The *Post* Statements and the X Posts are false. Plaintiff did not beat Defendant, did not punch her in the face, did not strike her in Washington, and was not frequently abusive toward her. The December 24, 2025 fight did not leave Defendant with serious injuries: when Plaintiff left she was not bleeding, and her own photograph seven hours later depicts only a small red mark consistent with a scratch, as alleged in paragraphs 13 and 16. Plaintiff did not flee to avoid the police; he left the inn approximately ten hours before Defendant first

contacted law enforcement, as alleged in paragraph 22.

44. Defendant's own recorded statements contradict her public statements. On December 25, 2025, Defendant told the 911 operator that her nose "was bleeding earlier" and that after Plaintiff left she "went to bed." On February 1, 2026, she said "[t]here was blood everywhere" and that she believed Plaintiff "left me unconscious there." The room had one drop of blood on the side table, one drip on a bathroom wall, and no blood on the white bedding, as alleged in paragraph 15. Her own photograph at 6:00 a.m. shows no black eye, as alleged in paragraph 16. On December 25, 2025, she said Plaintiff told her he was taking her phone to the sheriff's department; afterward she said her phone "was stolen as part of a crime."

45. Defendant told RiverCom Dispatch that Plaintiff had texted her new phone number. He could not have done so, because he did not have the number, as alleged in paragraph 25. That same number was later added to Plaintiff's Google account without his authorization, as alleged in paragraph 26.

46. Defendant also told the Pasco County Sheriff's Office that there were warrants for Plaintiff's arrest for felony assault, when no warrant had been issued and no officer had told her that one had, as alleged in paragraph 29.

47. Defendant was present for the events she described and knew what happened. She made the *Post* Statements and the X Posts knowing they were false, or with reckless disregard of whether they were false.

48. Defendant made these statements with malice, as shown by her unauthorized access to Plaintiff's email account beginning December 27, 2025; her keeping of Plaintiff's X earnings after the parties separated; and her withdrawal of $30,000 of Plaintiff's money, all as alleged below.

49. Defendant's accusations have been repeated by online commentators and the press, and have substantially damaged Plaintiff's reputation among his audience, his business contacts, and the public.

G. Defendant's Unauthorized Access to Plaintiff's Email Account

50. Plaintiff maintains a Google email account, jonnyrichesflorida@gmail.com (the "Account"). The Account stores Plaintiff's email, including communications with his attorneys and payment receipts.

51. Plaintiff never authorized Defendant to access the Account.

52. Google's access records for the Account, obtained through Google Takeout, show more than 740 access events by a Motorola moto g stylus 5G device that Plaintiff did not authorize.

53. Defendant first logged in to the Account on December 27, 2025, after she had reported to police that Plaintiff attacked her. She had never logged in to the Account before that date. She remained logged in through August 8, 2026, including after the Agreed Order was entered on March 30, 2026.

54. Defendant left the device's location setting turned on. Using the Account's locate-device feature, Plaintiff located the device in Hot Springs, Garland County, Arkansas, where Defendant lives.

55. Defendant added her new phone number, described in paragraphs 23 through 26, to the Account without Plaintiff's authorization. Her number is still connected to the Account.

56. Plaintiff has changed the Account password and signed Defendant's device out of the Account. Because her phone number remains connected, Defendant can use it at any time to reset the password and log in to the Account again.

57. Google requires a verification code to be sent to Defendant's phone number before that number can be removed. Sending a code to Defendant's phone could be treated as contact with Defendant in violation of the Agreed Order. Plaintiff therefore cannot remove her number on his own.

58. Plaintiff reported the unauthorized access to the Pasco County Sheriff's Office, Case No. 202643897, on August 8, 2026.

59. Through the access, Defendant obtained, viewed, and used emails stored in the Account.

60. Upon information and belief, Defendant used the access in an attempt to delete a video Plaintiff had recorded of Defendant. Plaintiff had preserved a copy of the video elsewhere.

61. An email from Plaintiff to his attorney, stored in the Account and protected by the attorney-client privilege, was published on X. The post has since been deleted. Upon information and belief, Defendant obtained the email through her access to the Account and caused it to be published.

62. Plaintiff sent a payment through Zelle. The Zelle receipt emails were delivered to the Account. The next day, Ali Eslami, who publishes online as "Nerdy," posted about Plaintiff's payments. Eslami did not say the word "Zelle," and he did not post the receipt. The payment had not been made public, and Eslami had no source for that information other than the Account.

63. Plaintiff sent an email from the Account to the attorney for Eva Freeth's husband. Eslami later posted that email and claimed that the attorney gave it to Eva Freeth's husband and her husband gave it to her. Upon information and belief, the email was obtained by Defendant viewing it in the Account's sent folder. Plaintiff will establish how the email was obtained through discovery, including depositions.

64. Plaintiff's location could be tracked through the Account. Upon information and belief, Defendant used her access to the Account to track Plaintiff's location, and that is how his whereabouts in connection with a flight became known. Plaintiff had not made that flight public. On June 19, 2026, at 7:36 p.m., Eslami posted on X from his account @Nerdy_Addict: "He flew in a date, and doesn't want the other women knowing." According to X's view count, that post has been viewed more than 780 times. In a reply on X, Eslami also wrote: "Nope. He reportedly flew in a chick and can't let his hens know."

65. Eslami had no source for the information about the flight other than the Account. Upon information and belief, the information was obtained by Defendant tracking Plaintiff's location through the Account. Plaintiff will establish how the information was obtained through discovery.

66. Information about Plaintiff's rental of a place in Arizona from Kristen Kovacs was in the Account. Plaintiff had not made that rental public. Eslami later posted about Kristen Kovacs. Eslami had no source for that information other than the Account. Upon information and belief, the information was obtained by Defendant viewing it in the Account. Plaintiff will establish the date of the post and how the information was obtained through discovery.

H. Defendant's Keeping of Plaintiff's X Income

67. Plaintiff earns income through the creator monetization program on his X account, which pays out to a connected payment account.

68. While the parties were together, Defendant connected her own Stripe account to Plaintiff's X monetization account, so that X paid Plaintiff's earnings into her Stripe account.

69. After the relationship ended on December 24, 2025, Defendant's Stripe account remained connected, and X continued to pay Plaintiff's earnings into it for approximately seven months.

70. Plaintiff asked X to replace Defendant's Stripe account with his own. X responded that the payment account could not be changed without access to Defendant's Stripe account.

71. Defendant knew she was receiving Plaintiff's earnings. She did not disconnect her Stripe account, tell Plaintiff, or return the money.

72. Defendant removed her Stripe account only after Plaintiff made a public post on X about it.

73. X paid more than $6,000 of Plaintiff's earnings into Defendant's Stripe account after the relationship ended. Each payout is a specific amount recorded by X and Stripe. Defendant has kept the payouts and has not returned them.

I. Defendant's Withdrawal of $30,000 of Plaintiff's Money

74. Plaintiff and Defendant were both named on a bank account (the "Bank Account").

75. All of the money in the Bank Account was Plaintiff's earnings. None of it was Defendant's share. Defendant's compensation was the $3,000 monthly salary Plaintiff paid her.

76. The parties intended the money in the Bank Account to belong to Plaintiff.

77. Defendant withdrew $30,000 from the Bank Account and has kept it.

J. Defendant's February 1, 2026 Statements to the Pasco County Sheriff's Office About September 6–7, 2025

78. On February 1, 2026, at approximately 1:56 p.m., Deputy Donald Venedam of the Pasco County Sheriff's Office was dispatched to 9713 Baxley Lane, Port Richey, Florida, in reference to a domestic battery. Because the call notes stated that Defendant lived out of state, Deputy Venedam contacted Defendant by telephone. Upon information and belief, Defendant spoke with him from Hot Springs, Arkansas.

79. Defendant told Deputy Venedam that on September 6–7, 2025, at 9713 Baxley Lane, Plaintiff started punching her in the face, knocked her to the ground, and kicked her ribs, leaving a permanent scar on her left cheek. Deputy Venedam recorded her statements in Pasco Sheriff's Office Incident Report No. 26003538 (the "Spoken Statements").

80. Defendant also sent Deputy Venedam a written statement titled "Statement of Jaime Phillips" (the "Written Statement"). The Written Statement says:

> "Overnight on or about September 6–7, 2025, while residing together in Pasco County, Florida, a particularly severe assault occurred. During this incident, he repeatedly punched me in the face and head with his fists while I was lying on the floor in a fetal position, unable to defend myself. He also kicked me in the ribs."
>
> "As a result of this assault, I sustained extensive bruising to my face, jaw, ribs, and body; experienced blood in my urine for several days; suffered a permanent injury to my left cheekbone; and my face and jaw were visibly bruised as the injuries developed over multiple days."

81. The Written Statement also says that Plaintiff recorded a video of Defendant "immediately following the assault." Plaintiff recorded that video. A still image from it, attached as Exhibit A, shows Defendant standing upright, holding a small object in one hand,

with her other fist raised. The video shows no bruises on Defendant's face or body, even though she says it was recorded immediately after Plaintiff repeatedly punched her in the face and head.

82. Deputy Venedam wrote in the incident report that he "did not observe anything that looked like permanent scarring on her left cheek as stated to me, and in the written statement," and that Defendant "did not go to the hospital after this incident, therefore there are no medical records to confirm her statements."

83. The Spoken Statements and the Written Statement are false. Plaintiff never punched or kicked Defendant, on September 6–7, 2025, or at any other time. Defendant's face was not bruised after September 6–7, 2025.

84. Defendant was present on September 6–7, 2025, and knew that Plaintiff did not punch or kick her. She made the Spoken Statements and the Written Statement knowing they were false.

85. Based on Defendant's statements, Deputy Venedam recorded her accusations against Plaintiff in an official incident report and recommended that the case be forwarded to the State Attorney's Office for review and possible prosecution. Defendant's statements injured Plaintiff's reputation and caused him actual damages.

COUNT I
Computer Trespass, Ark. Code Ann. §§ 5-41-104 and 5-41-106

86. Plaintiff realleges and incorporates by reference paragraphs 1 through 85 as if fully set forth herein.

87. A person commits computer trespass if the person intentionally and without authorization accesses, alters, deletes, damages, destroys, or disrupts any computer, computer system, computer network, computer program, or data. Ark. Code Ann. § 5-41-104(a).

88. Defendant intentionally and without authorization accessed Plaintiff's Account, and the computer systems, network, and data through which it is provided, more than 740 times, from a device located in Hot Springs, Arkansas.

89. Through that access, Defendant obtained Plaintiff's private emails, including privileged communications with his attorneys and his payment receipts, and, upon information and belief, used the Account to track Plaintiff's location. Upon information and belief, those emails and the information in them, including Plaintiff's location, were shared with third parties. Defendant also added her phone number to the Account, which gives her a continuing means to take control of it, as alleged in paragraphs 55 through 57.

90. Any person whose property or person is injured by a violation of the computer-crimes subchapter may recover for any damages sustained and the costs of suit, and damages include loss of profits. Ark. Code Ann. § 5-41-106(a).

91. Plaintiff was injured in his person and property by Defendant's computer trespass, including through the exposure of his privileged attorney communications and private financial information, in an amount to be proven at trial.

92. Unless the Court orders otherwise, Defendant's phone number will remain connected to the Account and she will remain able to reset the password and access the Account at will. Plaintiff has no adequate remedy at law for that continuing threat.

93. Plaintiff discovered the violation no later than August 8, 2026. This action is timely under Ark. Code Ann. § 5-41-106(c), which allows three years from discovery.

COUNT II
Conversion of Plaintiff's X Earnings

94. Plaintiff realleges and incorporates by reference paragraphs 1 through 85 as if fully set forth herein.

95. Conversion is a common-law tort action for the wrongful possession or disposition of another's property. To establish liability, a plaintiff must prove that the defendant wrongfully committed a distinct act of dominion over the property of another, which is a denial of or is inconsistent with the owner's rights. *McQuillan v. Mercedes-Benz Credit Corp.*, 331 Ark. 242, 961 S.W.2d 729 (1998).

96. The X payouts paid into Defendant's Stripe account are specific, identifiable sums of money belonging to Plaintiff, each recorded by X and Stripe.

97. Defendant intentionally took and kept those funds, exercising control over them inconsistent with Plaintiff's ownership and without his consent.

98. Plaintiff has been damaged in the amount of the converted funds, more than $6,000, plus interest.

99. Plaintiff is entitled to punitive damages under Ark. Code Ann. § 16-55-206 because Defendant knew or ought to have known that her conduct would naturally and probably result in injury to Plaintiff and continued that conduct with malice or in reckless disregard of the consequences, and because Defendant intentionally pursued a course of conduct for the purpose of causing injury to Plaintiff.

COUNT III

Recovery of Funds Withdrawn from a Joint Account in Excess of Defendant's Interest

100. Plaintiff realleges and incorporates by reference paragraphs 1 through 85 as if fully set forth herein.

101. The statute permitting a bank to pay a joint account to either owner does not determine ownership of the funds as between the account owners. As between them, the funds are apportioned in accordance with the intentions of the parties, and one who withdraws funds in excess of his or her share is liable to the other joint owner for the excess so withdrawn. *Hogan v. Hogan*, 313 Ark. 374, 855 S.W.2d 905 (1993); *see* Ark. Code Ann. § 23-32-1005.

102. The parties intended all of the money in the Bank Account to belong to Plaintiff. Defendant had no share of it. Her compensation was the $3,000 monthly salary Plaintiff paid her.

103. Defendant withdrew $30,000 from the Bank Account, all of which exceeded her share, and has kept it.

104. Defendant is liable to Plaintiff for the $30,000 she withdrew, plus interest.

COUNT IV
Unjust Enrichment (in the alternative to Counts II and III)

105. Plaintiff realleges and incorporates by reference paragraphs 1 through 85 as if fully set forth herein.

106. Defendant received a direct benefit from Plaintiff: more than $6,000 in Plaintiff's X earnings paid into her Stripe account and $30,000 of Plaintiff's money withdrawn from the Bank Account, beyond the salary he paid her.

107. Defendant knew of and accepted and retained the benefit.

108. It would be inequitable for Defendant to keep these funds without paying Plaintiff their value.

COUNT V
Invasion of Privacy — Intrusion upon Seclusion

109. Plaintiff realleges and incorporates by reference paragraphs 1 through 85 as if fully set forth herein.

110. The tort of intrusion consists of (1) an intrusion (2) that is highly offensive (3) into some matter in which a person has a legitimate expectation of privacy. *Wal-Mart Stores, Inc. v. Lee*, 348 Ark. 707, 74 S.W.3d 634 (2002).

111. Plaintiff had a legitimate expectation of privacy in the Account and the private communications stored in it, including privileged communications with his attorneys and his financial records.

112. Defendant intentionally intruded into the Account, electronically and without authorization, more than 740 times.

113. The intrusion would be highly offensive to a reasonable person.

114. Upon information and belief, what Defendant obtained was used to share Plaintiff's private communications with third parties, causing Plaintiff damages, including emotional distress and harm to his business and his legal matters.

115. Plaintiff is entitled to punitive damages under Ark. Code Ann. § 16-55-206 because Defendant knew or ought to have known that her conduct would naturally and probably result in injury to Plaintiff and continued that conduct with malice or in reckless disregard of the consequences, and because Defendant intentionally pursued a course of conduct for the purpose of causing injury to Plaintiff.

COUNT VI
Defamation (Slander) — Statements to the *New York Post*

116. Plaintiff realleges and incorporates by reference paragraphs 1 through 85 as if fully set forth herein.

117. This Count is not based on any statement Defendant made to law enforcement, to an emergency dispatcher, or in any court filing.

118. To establish defamation, whether by the spoken word (slander) or the written word (libel), a plaintiff must prove (1) the defamatory nature of the statement of fact; (2) that statement's identification of or reference to the plaintiff; (3) publication of the statement by the defendant; (4) the defendant's fault in the publication; (5) the statement's falsity; and (6) damages. *Faulkner v. Arkansas Children's Hospital*, 347 Ark. 941, 69 S.W.3d 393 (2002).

119. Upon information and belief, Defendant published the *Post* Statements, described in paragraphs 33 and 34, to the *New York Post* on or about March 20, 2026, intending that they be published, and the *New York Post* published them to the public on March 20, 2026. On March 21, 2026, Defendant posted on X from her account @MagnoliaXRio, as alleged in paragraph 32: "The NY Post reached out to me yesterday and I answered some of the questions they had for the story."

120. The *Post* Statements refer to Plaintiff by name.

121. The statements are statements of fact. They are false, as alleged in paragraphs 43 through 45.

122. The statements are defamatory. They accuse Plaintiff of violent crimes and expose him to public hatred, contempt, and ridicule.

123. Defendant was at fault in publishing the statements. She knew the statements were false, or made them with reckless disregard of whether they were false, as alleged in paragraphs 47 and 48.

124. The statements injured Plaintiff's reputation and caused him actual damages, as alleged in paragraph 49.

125. This Count is timely under Ark. Code Ann. § 16-56-104, which allows one year for actions for words spoken slandering the character of another.

126. Plaintiff is entitled to punitive damages under Ark. Code Ann. § 16-55-206 because Defendant knew or ought to have known that her conduct would naturally and probably result in injury to Plaintiff and continued that conduct with malice or in reckless disregard of the consequences, and because Defendant intentionally pursued a course of conduct for the purpose of causing injury to Plaintiff.

COUNT VII
Defamation (Libel) — August 30, 2026 Post on X

127. Plaintiff realleges and incorporates by reference paragraphs 1 through 85 as if fully set forth herein.

128. This Count is not based on any statement Defendant made to law enforcement, to an emergency dispatcher, or in any court filing.

129. To establish defamation, whether by the spoken word (slander) or the written word (libel), a plaintiff must prove (1) the defamatory nature of the statement of fact; (2) that statement's identification of or reference to the plaintiff; (3) publication of the statement by the defendant; (4) the defendant's fault in the publication; (5) the statement's falsity; and (6) damages. *Faulkner v. Arkansas Children's Hospital*, 347 Ark. 941, 69 S.W.3d 393 (2002).

130. Defendant published the August 30, 2026 post, described in paragraph 37, to the public on X from her account @MagnoliaXRio. The post states: "It's not 'just DV.' It's like the police told me in the ER in Washington - 'dirtbag psychopaths' who beat women never plateau. They only escalate over time. This is why so many of them end up as cold-blooded

killers in the end. They have no regard for human life."

131. Readers understood the post to refer to Plaintiff, as alleged in paragraph 41.

132. The statements are statements of fact. They are false, as alleged in paragraphs 43 through 45.

133. The statements are defamatory. They accuse Plaintiff of violent crimes and expose him to public hatred, contempt, and ridicule.

134. Defendant was at fault in publishing the statements. She knew the statements were false, or made them with reckless disregard of whether they were false, as alleged in paragraphs 47 and 48.

135. The statements injured Plaintiff's reputation and caused him actual damages, as alleged in paragraph 49.

136. This Count is timely under Ark. Code Ann. § 16-56-105, which allows three years for actions for libels.

137. Plaintiff is entitled to punitive damages under Ark. Code Ann. § 16-55-206 because Defendant knew or ought to have known that her conduct would naturally and probably result in injury to Plaintiff and continued that conduct with malice or in reckless disregard of the consequences, and because Defendant intentionally pursued a course of conduct for the purpose of causing injury to Plaintiff.

COUNT VIII
Defamation (Libel) — September 2, 2026 Post on X

138. Plaintiff realleges and incorporates by reference paragraphs 1 through 85 as if fully set forth herein.

139. This Count is not based on any statement Defendant made to law enforcement, to an emergency dispatcher, or in any court filing.

140. To establish defamation, whether by the spoken word (slander) or the written word (libel), a plaintiff must prove (1) the defamatory nature of the statement of fact; (2) that

statement's identification of or reference to the plaintiff; (3) publication of the statement by the defendant; (4) the defendant's fault in the publication; (5) the statement's falsity; and (6) damages. *Faulkner v. Arkansas Children's Hospital*, 347 Ark. 941, 69 S.W.3d 393 (2002).

141. Defendant published the September 2, 2026 post, described in paragraph 39, to the public on X from her account @MagnoliaXRio. The post states: "It's so crazy how violent psychopaths think they're so big and bad when they're brutally assaulting and punching a tiny woman in the face, but suddenly they're cowardly little bitches when the police come knocking and will hide under tables and even drive cross-country to avoid . . . ."

142. Readers understood the post to refer to Plaintiff, as alleged in paragraph 41.

143. The statements are statements of fact. They are false, as alleged in paragraphs 43 through 45.

144. The statements are defamatory. They accuse Plaintiff of violent crimes and expose him to public hatred, contempt, and ridicule.

145. Defendant was at fault in publishing the statements. She knew the statements were false, or made them with reckless disregard of whether they were false, as alleged in paragraphs 47 and 48.

146. The statements injured Plaintiff's reputation and caused him actual damages, as alleged in paragraph 49.

147. This Count is timely under Ark. Code Ann. § 16-56-105, which allows three years for actions for libels.

148. Plaintiff is entitled to punitive damages under Ark. Code Ann. § 16-55-206 because Defendant knew or ought to have known that her conduct would naturally and probably result in injury to Plaintiff and continued that conduct with malice or in reckless disregard of the consequences, and because Defendant intentionally pursued a course of conduct for the purpose of causing injury to Plaintiff.

COUNT IX

Defamation (Slander) — February 1, 2026 Spoken Statements to the Pasco County

Sheriff's Office

149. Plaintiff realleges and incorporates by reference paragraphs 1 through 85 as if fully set forth herein.

150. To establish defamation, whether by the spoken word (slander) or the written word (libel), a plaintiff must prove (1) the defamatory nature of the statement of fact; (2) that statement's identification of or reference to the plaintiff; (3) publication of the statement by the defendant; (4) the defendant's fault in the publication; (5) the statement's falsity; and (6) damages. *Faulkner v. Arkansas Children's Hospital*, 347 Ark. 941, 69 S.W.3d 393 (2002).

151. On February 1, 2026, Defendant published the Spoken Statements, described in paragraph 79, to Deputy Venedam of the Pasco County Sheriff's Office by telephone.

152. The Spoken Statements identify Plaintiff by name, as recorded in the incident report.

153. The statements are statements of fact. They are false, as alleged in paragraph 83.

154. The statements are defamatory. They accuse Plaintiff of the crime of battery and expose him to public hatred, contempt, and ridicule.

155. Defendant was at fault in publishing the statements. She knew they were false, as alleged in paragraph 84, and she acted with malice, as shown by the conduct alleged in paragraph 48.

156. A qualified privilege "is lost if it is abused by excessive publication, if the statement is made with malice, or if the statement is made with a lack of grounds for belief in its truthfulness." *Wal-Mart Stores, Inc. v. Lee*, 348 Ark. 707, 74 S.W.3d 634 (2002); *Sawada v. Walmart Stores, Inc.*, 2015 Ark. App. 549, 473 S.W.3d 60.

157. Any qualified privilege Defendant may claim for statements to law enforcement was lost because she made the statements with malice and knowing they were false, so she had no grounds for belief in their truth.

158. The statements injured Plaintiff's reputation and caused him actual damages, as alleged in paragraph 85.

159. This Count is timely under Ark. Code Ann. § 16-56-104, which allows one year for actions for words spoken slandering the character of another.

160. Plaintiff is entitled to punitive damages under Ark. Code Ann. § 16-55-206 because Defendant knew or ought to have known that her conduct would naturally and probably result in injury to Plaintiff and continued that conduct with malice or in reckless disregard of the consequences, and because Defendant intentionally pursued a course of conduct for the purpose of causing injury to Plaintiff.

COUNT X

Defamation (Libel) — February 1, 2026 Written Statement to the Pasco County Sheriff's Office

161. Plaintiff realleges and incorporates by reference paragraphs 1 through 85 as if fully set forth herein.

162. To establish defamation, whether by the spoken word (slander) or the written word (libel), a plaintiff must prove (1) the defamatory nature of the statement of fact; (2) that statement's identification of or reference to the plaintiff; (3) publication of the statement by the defendant; (4) the defendant's fault in the publication; (5) the statement's falsity; and (6) damages. *Faulkner v. Arkansas Children's Hospital*, 347 Ark. 941, 69 S.W.3d 393 (2002).

163. On or about February 1, 2026, Defendant published the Written Statement, described in paragraphs 80 and 81, by sending it to Deputy Venedam of the Pasco County Sheriff's Office.

164. The Written Statement refers to Plaintiff as Defendant's partner with whom she resided in Pasco County, Florida. Defendant sent it to Deputy Venedam in connection with her Spoken Statements naming Plaintiff, and Deputy Venedam understood it to refer to Plaintiff, as shown by his incident report.

165. The statements are statements of fact. They are false, as alleged in paragraph 83.

166. The statements are defamatory. They accuse Plaintiff of the crime of battery and expose him to public hatred, contempt, and ridicule.

167. Defendant was at fault in publishing the statements. She knew they were false, as alleged in paragraph 84, and she acted with malice, as shown by the conduct alleged in paragraph 48.

168. A qualified privilege "is lost if it is abused by excessive publication, if the statement is made with malice, or if the statement is made with a lack of grounds for belief in its truthfulness." *Wal-Mart Stores, Inc. v. Lee*, 348 Ark. 707, 74 S.W.3d 634 (2002); *Sawada v. Walmart Stores, Inc.*, 2015 Ark. App. 549, 473 S.W.3d 60.

169. Any qualified privilege Defendant may claim for statements to law enforcement was lost because she made the statements with malice and knowing they were false, so she had no grounds for belief in their truth.

170. The statements injured Plaintiff's reputation and caused him actual damages, as alleged in paragraph 85.

171. This Count is timely under Ark. Code Ann. § 16-56-105, which allows three years for actions for libels.

172. Plaintiff is entitled to punitive damages under Ark. Code Ann. § 16-55-206 because Defendant knew or ought to have known that her conduct would naturally and probably result in injury to Plaintiff and continued that conduct with malice or in reckless disregard of the consequences, and because Defendant intentionally pursued a course of conduct for the purpose of causing injury to Plaintiff.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Jonathan Lee Riches respectfully asks the Court to enter judgment against Defendant Jaime T. Phillips and award:

a. Actual damages in an amount to be proven at trial, including damages for injury to Plaintiff's reputation;

b. Return of, or damages equal to, the X payouts Defendant kept after December 24, 2025, in an amount to be proven at trial and not less than $6,000;

c. Return of, or damages equal to, the $30,000 Defendant withdrew from the Bank Account;

d. Under Ark. Code Ann. § 5-41-106(a), Plaintiff's damages from Defendant's computer trespass;

e. Punitive damages under Ark. Code Ann. § 16-55-206;

f. A permanent injunction ordering Defendant to stop accessing the Account and any other account of Plaintiff, and to stop disclosing Plaintiff's private communications;

g. An order requiring Defendant to remove her phone number from the Account, or, in the alternative, authorizing Plaintiff to remove it, including by causing a verification code to be sent to her number, without that act being treated as contact with Defendant under the Agreed Order in *Phillips v. Riches*, No. 26DR-26-51;

h. Pre-judgment and post-judgment interest;

i. Plaintiff's costs of this action; and

j. Such other relief as the Court finds just.

DEMAND FOR JURY TRIAL

Pursuant to Ark. R. Civ. P. 38(a), Plaintiff demands a trial by jury on all issues triable of right by a jury.

Dated: November 13, 2026

Respectfully submitted,

/s/ Jonathan Lee Riches
Jonathan Lee Riches
Plaintiff, Pro Se
9713 Baxley Lane
Port Richey, Florida 34668-4202
Telephone: (202) 666-9762
Email: tips.jlrinvestigates@gmail.com

IN THE CIRCUIT COURT OF GARLAND COUNTY, ARKANSAS
CIVIL DIVISION

Jonathan Lee Riches v. Jaime T. Phillips

EXHIBIT A

Still image from the video recorded by Plaintiff following the events of September 6–7, 2025, referred to in Defendant's written statement (Complaint ¶ 81)



IN THE CIRCUIT COURT OF GARLAND COUNTY, ARKANSAS
CIVIL DIVISION

JONATHAN LEE RICHES,	)	Case No.: To be assigned by the Clerk
	)	
Plaintiff,	)	**VERIFICATION OF PLAINTIFF**
	)	**(Ark. Code Ann. § 16-63-505)**
v.	)	
	)	
JAIME T. PHILLIPS,	)	
	)	
Defendant.	)	

I, Jonathan Lee Riches, am the Plaintiff in this action. I have read this Complaint. I verify that, to the best of my knowledge, information, and belief formed after reasonable inquiry:

1. the claims in this Complaint are well grounded in fact and are warranted by existing law or a good-faith argument for the extension, modification, or reversal of existing law;

2. the acts forming the basis of the claims are not privileged communications or acts in furtherance of the right of free speech or the right to petition government, because Defendant made the statements at issue with knowledge that they were false or with reckless disregard of whether they were false; and

3. this Complaint is not brought for any improper purpose, such as to suppress the right of free speech or petition, to harass, or to cause unnecessary delay or needless increase in the cost of litigation.

This verification is made under oath and filed in support of the Complaint as required by Ark. Code Ann. § 16-63-505. I swear that the factual allegations in this Complaint are true and correct to the best of my knowledge, information, and belief.

/s/ Jonathan Lee Riches
Jonathan Lee Riches
Plaintiff, Pro Se

STATE OF FLORIDA
COUNTY OF _____

Sworn to (or affirmed) and subscribed before me by means of ____ physical presence or ____ online notarization, this _____ day of _____, 20____, by Jonathan Lee Riches, who is ____ personally known to me or ____ produced _____ as identification.

_____
Notary Public, State of Florida
Printed name: _____
Commission expires: _____

(Notary seal)