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9 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
10 FOR THE COUNTY OF RIVERSIDE - RIVERSIDE BRANCH

11	<b>PATRICIA BEHR</b> , an individual,	)	Case No. INC 052881
		)	
12		)	[Honorable William E. Burby,
	Plaintiff,	)	Department HA1]
13	vs.	)	
		)	
14		)	<b>AFFIDAVIT OF RONALD RAMSDELL</b>
		)	<b>IN SUPPORT OF</b>
15	<b>THOMAS REDMOND</b> , an	)	<b>SUPPLEMENTAL MOTION</b>
	individual, and DOES 1 - 30,	)	<b>FOR NEW TRIAL</b>
16	Inclusive,	)	
		)	Judgment Entered: February 11, 2009
17		)	Date and time of Hearing: April 17, 2009
		)	8:30 A.M.
18		)	Place of Hearing: Department HA1
	Defendants.	)	Hawthorne Facility

19

20 STATE OF ARIZONA )  
21 )ss  
County of Maricopa )

22

23 Ronald Ramsdell, being first duly sworn upon oath, deposes and says:

24 1. I am Ronald Ramsdell and I reside in Minneapolis, Minnesota. I operate a business  
25 known as College Aid Consulting Services in Minneapolis, Minnesota, and a copy of one of the  
26 pages from my company website is attached hereto as EXHIBIT A.

1           2. IN 1989 PATRICIA BEHR NOT ONLY ADMITTED SHE HAD HERPES, SHE ALSO  
2 GAVE IT TO ME; I MAKE THIS AFFIDAVIT FOR THE REASONS WHICH FOLLOW  
3 BELOW.

4           3. On February 25 or 26, 2009, I got a call from a friend, Bruce Cedarholm, who had seen  
5 a news story which stated that Patricia Behr received a verdict of nearly \$7 million because of  
6 allegedly having gotten herpes from a 77-year-old man.

7           4. The story astonished both me and Bruce because, as said above, Patricia Behr gave *me*  
8 herpes in 1989, and I told Bruce about it at the time.

9           5. After receiving that call I checked on-line sources to confirm the story and discovered  
10 several which did so; one of them also contained the name of Robert Frisbee, the attorney for the  
11 defendant.

12           6. I did not know Mr. Frisbee and know of no way he could have found me without me  
13 contacting him.

14           7. I believe that Patricia Behr “set up” the defendant by falsely claiming that he gave her  
15 herpes, and that the jury did a great injustice. Therefore, I located Mr. Frisbee through Google and  
16 on February 27, 2009, I placed a call to him at his Phoenix, Arizona office.

17           8. I told Mr. Frisbee in that phone call that his client had been “set up” by Patricia Behr and  
18 that Patricia Behr gave me herpes years ago.

19           9. Mr. Frisbee asked if I would be willing to meet with him and offer an Affidavit to the  
20 court in support of Mr. Redmond’s post trial motions. I told him I would do so.

21           10. After arranging a mutually convenient time, I flew to Phoenix, met with Mr. Frisbee, and  
22 assisted him in the preparation of this Affidavit.

23           11. Patricia Behr was introduced to me by a friend at a cocktail party in 1989. She and I  
24 conversed, seemed to hit it off well, and agreed to go out on a date in the near future.

25           12. On our second date, Patricia Behr and I had unprotected sex. She did not ask me to use  
26 protection and she did not inquire whether I had any sexually transmitted diseases.

1           13. After several weeks of dating I moved in with her and three of her sons in her home at  
2 7632 Newton Avenue South, Richfield, Minnesota.

3           14. Attached hereto as EXHIBIT B is a photocopy of a picture of me with three of her sons  
4 and a child whose name I don't now recollect.

5           15. I lived with Patricia for a total of almost three years from 1989 to 1992, although there  
6 were several months in 1990 or 1991 during which we were broken up.

7           16. Three or four months after I moved in with her in 1989 I developed some small white  
8 blisters in my groin and pubic area. I did not go to a doctor because I had no medical insurance at  
9 the time, but I checked into the blisters and came to the belief that they were genital herpes.

10          17. I confronted Patricia about the blisters and told her that she must have given me herpes  
11 as I was not having sex with anybody else. She denied that she had herpes, said she couldn't have  
12 given it to me, and started to argue about it.

13          18. I didn't want to argue with her, so I told her that we could end the argument and find out  
14 for sure by both of us going to get tested; she finally stopped arguing, said there was no need to have  
15 tests, and admitted that she did in fact have herpes.

16          19. Patricia apologized for what had happened and said she didn't think she could infect me  
17 as she wasn't having an outbreak. However, she did provide me with some white ointment for use  
18 during outbreaks which she either had herself or got from another source.

19          20. I don't remember the name of the ointment, but I know it was a prescription because it  
20 had a pharmacy label on it along with a doctor's name, and it helped heal the blisters.

21          21. In 1992 Patricia and I split up permanently.

22          22. I am taking this action because I believe Patricia Behr is a fraud and I believe that, like  
23 the woman who spilled hot coffee on herself, Patricia has abused the legal system and worked a  
24 terrible injustice.

25          23. After Patricia Behr and I broke up for the final time I received threats on my life  
26 attributed to her, one directly from a large, vicious looking man and another from friends who had

1 been told by Patricia that she wanted me dead.

2 24. I am concerned about my safety because of coming forward like this, as I know Patricia  
3 Behr to be a vicious and vengeful woman. Therefore, I am taking steps to make sure that the  
4 authorities have a copy of this Affidavit in case something violent happens to me.

5 FURTHER AFFIANT SAYETH NOT.

6 DATED this 10th day of March, 2009.

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\_\_\_\_\_  
Ronald Ramsdell

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10 On the 10th day of March, 2009,  
11 Ronald Ramsdell appeared before me and  
executed the foregoing Affidavit.

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Notary Public

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