

UNITED STATES DISTRICT COURT

DISTRICT OF MINNESOTA

Kellye Strickland,

Plaintiff,

v.

Ramsey County, et al.,

Defendants.

Case No. 0:25-cv-02056-DWF-DJF

**SUPPLEMENTAL MOTION FOR PROTECTIVE RELIEF REGARDING THIRD-PARTY
SUPPRESSION OF LITIGATION-RELATED SPEECH AND EVIDENCE**

Plaintiff respectfully seeks additional protective relief in light of conduct and developments arising after the filing of her prior Motion for Protective Order. These developments reflect escalation affecting both evidentiary preservation and operational infrastructure connected to this litigation. Plaintiff therefore respectfully requests expedited consideration due to ongoing interference affecting evidence preservation and operational continuity.

I. NEW DEVELOPMENTS

Since filing her prior motion, Plaintiff has experienced third-party interference affecting the publication and preservation of materials related to this litigation, including disruption of hosting access and

attempts to characterize litigation-related documentation as prohibited conduct under a state-court Harassment Restraining Order (“HRO”) and related contempt proceedings.

These developments were not addressed in Plaintiff’s earlier motion and present distinct risks to:

- preservation of evidence;
- Plaintiff’s ability to document and maintain records concerning her own case;
- public-interest discussion of judicial proceedings; and
- Plaintiff’s access to courts and ability to exercise petition rights.

II. USE OF UNDERLYING HRO OUTSIDE COURT PROCESS

Plaintiff’s documentation of public proceedings and litigation activity has repeatedly been characterized to third parties as “violative” of the Harassment Restraining Order (“HRO”) or related contempt proceedings, despite:

- the absence of any express prohibition on public commentary;
- the contested scope and validity of those proceedings; and
- the federal nature of Plaintiff’s pending civil-rights claims.

Use of these orders outside formal judicial enforcement mechanisms to influence platforms and hosting providers risks expanding a limited state-court order into a de facto restraint on speech concerning ongoing federal litigation.

III. INTERFERENCE WITH EVIDENCE PRESERVATION

Plaintiff maintains an archive containing:

- court filings;
- procedural documentation;
- public-record materials; and
- contemporaneous litigation notes and commentary.

Loss of, or restricted access to, these materials directly affects preservation of the evidentiary record in this case and Plaintiff's ability to investigate, document, and prosecute her claims.

IV. FIRST AMENDMENT AND ACCESS-TO-COURTS CONCERNS

Speech concerning judicial proceedings lies at the core of First Amendment protection. Interference with a litigant's ability to document and discuss her own case raises:

- prior-restraint concerns;
- petition-clause implications; and
- due-process considerations.

Where third-party pressure is used to suppress litigation-related speech or documentation, federal courts possess inherent authority to act where necessary to protect their proceedings and a party's meaningful access to the courts.

V. COLLATERAL BUSINESS AND THIRD-PARTY IMPACT

The recent hosting termination did not affect only Plaintiff's personal archive. The account also supported:

- business websites;
- local client hosting functions; and
- operational infrastructure relied upon by third parties.

As a result of the termination, Plaintiff lost access not only to litigation-related materials but also to professional and client-facing systems.

This disruption resulted in:

- economic harm;
- interruption of business services; and
- collateral impact on individuals and entities not involved in the underlying dispute.

Where complaints referencing contested orders are directed to hosting providers, resulting enforcement actions may extend beyond individual content to affect a litigant's operational infrastructure and third-party services.

Federal courts possess authority to address litigation-related conduct that produces extrajudicial effects interfering with a party's ability to participate in proceedings, preserve evidence, and maintain the stability of the evidentiary record.

VI. SCALE OF OPERATIONAL DISRUPTION AND FORCED MIGRATION

The recent hosting termination affected the majority of Plaintiff's operational infrastructure.

Approximately 80% of Plaintiff's active sites were hosted through the terminated account. At the time of termination:

- 15 domains relied on that hosting environment;
- only 4 of 19 domains were independently hosted elsewhere; and
- Plaintiff was required to undertake an immediate migration to maintain continuity of operations.

This required:

- reconfiguration of hosting for 15 domains;
- restoration of site functionality under time constraints; and
- mitigation of downtime affecting business, archival, and client-facing material.

The disruption extended beyond Plaintiff's personal speech and documentation to the infrastructure through which her litigation archive, professional work, and related services were maintained.

Where complaints invoking contested orders result in removal of hosting infrastructure at this scale, the effects may extend beyond individual content moderation to implicate evidence preservation, operational continuity, and third-party reliance on hosted services.

Federal courts possess authority to address litigation-related conduct that produces extrajudicial consequences impairing a party's ability to maintain records, continue operations, and participate meaningfully in proceedings.

VII. ENFORCEMENT ACTIONS EXCEED THE SCOPE OF UNDERLYING ORDERS

The Harassment Restraining Order prohibits harassment and contact with Petitioner and expressly states that any relief not specifically listed is denied. It does not prohibit public-record documentation, litigation commentary, or the general operation of websites.

The subsequent contempt order addressed specific content alleged to violate that order and referenced removal of certain material from a single website. It did not direct termination of hosting accounts, shutdown of unrelated domains, or disruption of broader operational infrastructure.

Despite this limited scope, Plaintiff's hosting provider terminated the entire account supporting approximately 80% of her sites, including business and archival domains unrelated to the underlying dispute.

This outcome extends beyond the relief granted by the state court and produced extrajudicial consequences affecting:

- litigation-related documentation;
- preservation of evidentiary material;
- Plaintiff's professional operations; and
- third-party reliance on hosted services.

Use of limited state-court orders in a manner that results in infrastructure-wide suppression risks expanding those orders beyond their judicial scope and functionally restraining speech and litigation-related activity not addressed by the issuing court.

VIII. REPEATED WRITTEN NOTICE AND CONTINUED ESCALATION

Plaintiff has repeatedly placed opposing counsel on written notice that the Harassment Restraining Order does not operate as a gag order and does not prohibit lawful documentation of public proceedings or litigation activity.

Formal cease-and-desist notices were issued on September 25, September 30, January 23, and February

Independent sources have likewise declined to identify violations:

- multiple police documentation reports concluded that the website did not violate the HRO;
- hosting-provider legal review declined removal following complaints;
- the HRO expressly limits relief to the provisions listed and denies all other requested relief; and
- the contempt order addressed specific content and did not authorize infrastructure-wide enforcement.

Despite this record, complaints referencing the HRO and related contempt proceedings continued, culminating in termination of Plaintiff's hosting account and disruption of domains, archival materials, and business operations.

This sequence reflects escalation following repeated written notice and presents a substantial risk that litigation-related speech and evidence preservation will continue to be affected through third-party enforcement mechanisms rather than judicial process.

IX. DOCUMENTED NOTICE AND THIRD-PARTY ESCALATION

Beginning in September 2025, Plaintiff issued multiple written notices to opposing counsel and related parties regarding use of the Harassment Restraining Order and related materials as a basis for complaints to registrars, hosts, and third-party platforms.

Those notices:

- advised that no order authorized removal of Plaintiff's websites;
- documented repeated complaints directed to vendors;
- referenced independent findings that the website did not violate the HRO; and
- requested cessation of takedown efforts absent a valid court directive.

Police documentation reports likewise identified no direct violation of the HRO and resulted in no enforcement action. Hosting-provider legal review similarly declined removal following complaints.

Despite these notices and independent findings, complaints invoking the HRO and related contempt proceedings continued. Plaintiff's primary hosting account was subsequently terminated, resulting in loss of access to multiple domains, business infrastructure, and archival material connected to active litigation.

This sequence reflects escalation following written notice and the emergence of third-party enforcement effects not ordered by the state court.

X. REQUESTED RELIEF

Plaintiff respectfully requests that the Court:

1. Clarify that documentation, discussion, and preservation of materials relating to this litigation and to public judicial proceedings are not prohibited absent a specific order of this Court;
2. Affirm that preservation and publication of public-record materials connected to this case do not constitute misconduct absent a judicial finding;
3. Direct that parties and their agents refrain from presenting contested state-court orders to third-party platforms in a manner intended to suppress litigation-related speech or evidentiary materials outside formal judicial process;
4. Order that no party or their agent use harassment restraining orders, contempt proceedings, or related allegations to initiate or support takedown requests affecting domains, hosting accounts, or archival infrastructure connected to this litigation, absent a specific court directive; and

5. Grant such further relief as the Court deems just and appropriate to protect the integrity of the evidentiary record, Plaintiff's access to the courts, and the stability of litigation-related documentation.

Dated: February 9, 2026

Respectfully submitted,

/s/ **Kellye Strickland**

Kellye Strickland

6445 S. Maple Ave., Apt 2006

Tempe, AZ 85283

(603) 892-8666

kellye.sundar@gmail.com

Plaintiff, Pro Se

UNITED STATES DISTRICT COURT

DISTRICT OF MINNESOTA

Kellye Strickland,

Case No. 0:25-cv-02056-DWF-DJF

Plaintiff,

v.

EXHIBIT A-1

Ramsey County, et al.,

Defendants.

EXCERPT OF JANUARY 28, 2026 CONTEMPT ORDER

This exhibit contains a limited excerpt of the January 28, 2026 contempt order,
submitted for the purpose of illustrating the scope of relief ordered by the
state court and the specific content referenced therein.

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF RAMSEY

SECOND JUDICIAL DISTRICT

Madeline Sally Machla Lee, Petitioner

v.

Kellye Strickland, Respondent

Court File No.: 62-HR-CV-24-963

Case Type: Harassment

CONTEMPT ORDER

This matter came before the Honorable Nicole Starr on January 22, 2026, for an evidentiary hearing on Petitioner's Notice of Motion and Motion for Contempt filed on November 10, 2025. This matter was held via Zoom.

Petitioner Madeline Lee (Lee) was present and represented by Attorney Kyle Manderfeld. Respondent Kellye Strickland (Strickland) was present and represented herself.

Based on the agreements of the parties and counsel, and all the files, proceedings and records herein, the Court Orders the following:

ORDER

1. Strickland shall pay a fine of \$1,000 for violating the Harassment Restraining Order on February 5, 2026 by 4:30 P.M. Central Standard time. Unpaid fines shall result in a Judgment against Strickland and shall be sent to collectors. This fine shall be vacated when Strickland removed all references to Lee, all images purported to be of Lee, and all images purported to be created by Lee from the website onionmadder.com.
2. Strickland shall pay attorney's fees to Lee for the prosecution of this contempt motion. Lee shall submit an affidavit detailing the expenses related to prosecution of this motion.
3. Absent court order, neither party shall respond to further motions on previously resolved issues.

UNITED STATES DISTRICT COURT

DISTRICT OF MINNESOTA

Kellye Strickland,

Case No. 0:25-cv-02056-DWF-DJF

Plaintiff,

v.

EXHIBIT A-2

Ramsey County, et al.,

Defendants.

POLICE DOCUMENTATION REPORT

This exhibit consists of a police documentation report submitted as evidence that no enforcement action was taken and that no violation of the Harassment Restraining Order was identified.



Brooklyn Park Police Department

Summary



Print Date/Time: 01/22/2026 08:25
Login ID: brooklynpark\rhondaa
Case Number: 2025-00018955

Brooklyn Park Police Department
ORI Number: MN0270300

Case

Case Number: 2025-00018955
Location: Protected - Private Data
Reporting Officer ID: ALUR01 - Urgiles

Incident Type: Order Violation
Occurred From: 05/25/2025 10:05
Occurred Thru: 05/25/2025 10:05
Disposition: Inactive
Disposition Date: 05/28/2025
Reported Date: 05/25/2025 10:05 Sunday

Offenses

No.	Group/ORI	Crime Code	Statute	Description	Counts
1	State	90Z	609.748.6(b) MS	Restraining Order Violation Knowingly Violates	1

Subjects

Type	No.	Name	Address	Phone	Race	Sex	DOB/Age
Suspect	1	STRICKLAND, KELLYE ANNE	5400 NPA Brooklyn park, MN 55443		White	Female	Private Data 41
Victim	1	LEE, MADELINE SALLY MACHLA	Protected - Private Data		White	Female	Private Data 35

Arrests

Arrest No.	Name	Address	Date/Time	Type	Age
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Property

Date	Code	Type	Make	Model	Description	Tag No.	Item No.
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Vehicles

No.	Role	Vehicle Type	Year Make	Model	Color	License Plate	State
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001-SUMMARY 320 05/25/25

Squads were dispatched to a harassment restraining order violation. Report was taken and case number was provided.

002-ORIGINAL REPORT 320 05/25/25**PRELIMINARY INFORMATION:**

On May 25, 2025, at approximately 1012 hours, I, Officer A. Urgiles, Badge 320, was dispatched to an assist located at our north police department. Dispatched advised the reporting party wanted to report a harassment restraining order violation.

OFFICER'S OBSERVATIONS AND ACTIONS:

Upon arrival, I made contact with the reporting party. She was later identified as Madeline Sally Machla Lee [Private Data]. The following is what Lee explained.

- Lee filed for a harassment restraining order in August of 2024, against a subject she verbally identified as Kellye Anne Strickland [Private Data].
- The harassment restraining order was granted in December of 2024.
- It was officially served to Strickland in February of 2025.
- Lee provided me with the case number for Ramsey County, where the harassment restraining order was filed, 62-HR-CV-24-963.
- Lee explained that she knows Strickland due to a mutual friend.
- Lee stated that she was sexually assaulted by the mutual friend that Strickland and her have.
- Lee believes that Strickland is doing all of this because Strickland believes that Lee is falsely accusing the friend.
- Lee mentioned that Strickland lives in Arizona.
- Today, this morning, Lee received a text message from another mutual friend who is friends with Strickland on Facebook, showing Lee screenshots of a Facebook post that Strickland did.
- Lee provided me with screenshots of the Facebook post and comments.
- Lee recognizes that it is Strickland due to the profile picture.
- Lee mentioned that Strickland doesn't have her real name on her social media Facebook account.
- Lee would like to report this because she understands this is a violation and would like this to stop.

I informed Lee I will be taking the report, and I provided Lee with an Axon link where she can upload screenshots of the Facebook post she received from her friend.

DISPOSITION:

Squads were dispatched to a harassment restraining order violation. Report was taken and case number was provided. Axon link sent.

DICTATED BY: Officer A. Urgiles, Badge 320, Squad 1719, Body-worn Camera: Yes
Transcribed by: MH 3961

UNITED STATES DISTRICT COURT

DISTRICT OF MINNESOTA

Kellye Strickland,

Case No. 0:25-cv-02056-DWF-DJF

Plaintiff,

v.

EXHIBIT A-3

Ramsey County, et al.,

Defendants.

POLICE DOCUMENTATION REPORT

This exhibit consists of a police documentation report reflecting no enforcement action and no identified violation of the Harassment Restraining Order.



Brooklyn Park Police Department

Summary



Print Date/Time: 01/22/2026 08:21
Login ID: brooklynpark\rhondaa
Case Number: 2025-00035910

Brooklyn Park Police Department
ORI Number: MN0270300

Case

Case Number: 2025-00035910
Location: Protected - Private Data
Reporting Officer ID: MILA01 - LaRock

Incident Type: Court Order Information
Occurred From: 09/17/2025 19:49
Occurred Thru: 09/17/2025 19:49
Disposition: Case Closed
Disposition Date: 09/18/2025
Reported Date: 09/17/2025 19:49 Wednesday

Offenses

No.	Group/ORI	Crime Code	Statute	Description	Counts
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Subjects

Type	No.	Name	Address	Phone	Race	Sex	DOB/Age
Mentioned	1	STRICKLAND, KELLYE	6445 S MAPLE AVE 2006 TEMPE, AZ 85283		White	Female	Private Data 41
Reporting Party	1	LEE, MADELINE SALLY MACHLA	Protected - Private Data		White	Female	Private Data 36

Arrests

Arrest No.	Name	Address	Date/Time	Type	Age
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Property

Date	Code	Type	Make	Model	Description	Tag No.	Item No.
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Vehicles

No.	Role	Vehicle Type	Year Make	Model	Color	License Plate	State
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001-SUMMARY 289 09/17/25

Report of ongoing harassment. Report taken.

002-ORIGINAL REPORT 289 09/17/25

On 09/17/25 at approximately 2006 hours, I, Officer M. LaRock, Badge 289, met with Madeline Lee in an interview room to document her concerns regarding ongoing harassment by Kellye Strickland. Lee reported that Strickland has been harassing her online for over a year, despite an active restraining order issued in December 2024 (62HRCV24963). She stated that Strickland has continued to target her through various means, including creating defamatory websites impersonating her.

Lee stated that she recently discovered a website titled "pojokutty.com," which uses her childhood nickname, "Pojo Kutty," as its domain name. She explained that this nickname is unique to her and has been used as her screen name on multiple platforms. Lee believes the website is directed at her, as it contains degrading content and references her religious practice of covering her hair. She identified the website as belonging to Strickland, as it is registered under "Mad Sundar LLC," a company owned by Strickland, as confirmed by her LinkedIn profile. Lee provided documentation to support her claims, including a copy of the LinkedIn profile and other related materials (placed in attachments).

Lee described a history of escalating behavior by Strickland, including filing lawsuits against public officials, making false allegations, and calling Child Protective Services on her twice. She stated that Strickland has created multiple websites targeting her and believes these actions are attempts to disrupt her life and target her.

Lee explained that she has no personal relationship with Strickland and has only encountered her in court. She believes the harassment stems from Strickland's association with a man who assaulted her in 2022. According to Lee, Strickland has retaliated by spreading false allegations and creating defamatory content online.

Lee acknowledged that the current restraining order does not explicitly prohibit Strickland's online actions. She stated that she is working with her lawyer to amend the order but noted that the process has been delayed due to Strickland's frequent legal filings. Lee requested that the incident be documented in a police report for use in her ongoing legal efforts.

Lee provided her contact information and current address for the report. She also handed over copies of the evidence she had compiled, including documentation of the website and Strickland's LinkedIn profile. Lee stated that she has retained copies of all the materials for her records.

No direct violation of the restraining order was identified during this interaction, as the current order does not explicitly address the type of online harassment described. The information provided by Lee was documented, and a case number was issued for her reference.

FIELD REPORTED BY: Officer M. LaRock, Badge 289, Body-worn Camera: 289, Squad 1700
Merged by: ML 3967

I acknowledge this report was generated using the assistance of Draft One by Axon. I further acknowledge that I have reviewed the report in detail, made any necessary edits, and believe it to be an accurate representation of my recollection of the reported events. If needed, I am willing to testify to the accuracy of this report.

UNITED STATES DISTRICT COURT

DISTRICT OF MINNESOTA

Kellye Strickland,

Case No. 0:25-cv-02056-DWF-DJF

Plaintiff,

v.

EXHIBIT A-4

Ramsey County, et al.,

Defendants.

POLICE DOCUMENTATION REPORT

This exhibit consists of a police documentation report submitted to document independent review and lack of enforcement action.



Brooklyn Park Police Department

Summary



Print Date/Time: 01/22/2026 08:28
Login ID: brooklynpark\rhondaa
Case Number: 2025-00036502

Brooklyn Park Police Department
ORI Number: MN0270300

Case

Case Number: 2025-00036502
Location: Protected - Private Data
Brooklyn Park, MN 55428
Reporting Officer ID: CAAD01 - Adams

Incident Type: Order Violation
Occurred From: 09/22/2025 15:34
Occurred Thru: 09/22/2025 16:18
Disposition: Inactive
Disposition Date: 09/24/2025
Reported Date: 09/22/2025 15:34 Monday

Offenses

No.	Group/ORI	Crime Code	Statute	Description	Counts
1	State	90Z	609.748.6(b) MS	Restraining Order Violation Knowingly Violates	1

Subjects

Type	No.	Name	Address	Phone	Race	Sex	DOB/Age
Suspect	1	STRICKLAND, KELLY ANNE	5400 NPA Brooklyn park, MN 55443		White	Female	Private Data 41
Victim	1	LEE, MADELINE SALLY MACHLA	Protected - Private Data		White	Female	Private Data 36

Arrests

Arrest No.	Name	Address	Date/Time	Type	Age
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Property

Date	Code	Type	Make	Model	Description	Tag No.	Item No.
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Vehicles

No.	Role	Vehicle Type	Year Make	Model	Color	License Plate	State
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001-SUMMARY 324 09/22/25

Harassment restraining order violation.

002-ORIGINAL REPORT 324 09/22/25**PRELIMINARY INFORMATION:**

On September 22, 2025, at approximately 1539 hours, I, Officer C. Adams, Badge 324, was dispatched to the Brooklyn Park Police Department north precinct to assist with a court order violation in regards to protected party, Madeline Sally Machla Lee [Private Data]. The respondent of her order is Kellye Strickland [Private Data]. During this incident, I verified that the harassment restraining order with court file number 62HRCV24963 was indeed served on 02/27/2025. A brief summary provided of this harassment restraining order details that the subject is restrained from assaulting, threatening, abusing, harassing, following, interfering, or stalking the protected person and/or child of the protected person.

Prior to my arrival, I was advised by dispatch that the reporting party would like to report an order violation and has paperwork for the officer.

OFFICER'S OBSERVATIONS AND ACTIONS:

Upon arrival at the Brooklyn Park Police north precinct front lobby, I was introduced to Madeline Sally Machla Lee [Private Data] and invited her into a nearby interview room, where she provided a stack of papers and began to explain her situation. From her I learned the following:

- Respondent, Kellye Strickland [Private Data] has an actively served harassment restraining order against her.
- Yesterday, on 09/21/2025, Lee filed a police report about a violation of that order with Officer M. LaRock, Badge 289.
- Today, on 09/22/2025, she is here to file a new violation of that order.
- She has a copy of the police report from Officer LaRock and a copy of the order granting harassment restraining order after hearing, with court file number 62-HR-CV-24963.
- Along with that paperwork, she has print outs of the violation and additional print outs which prove the respondent is the creator of the violation.
- The new violation is labeled under Packet A, and the proof of person is labeled under Packet B.
- She advised me that she has spoken with her advisors and would like to create a new police report in regards to her harassment restraining order to assist her in either getting the language adjusted so that her order can more consistently and accurately protect her or that she can move forward with charges for the violation.

While I was speaking with Lee, she provided me a copy of all the paperwork, which in the moment was overwhelming to read through and completely interpret, however, during the initial investigation, I was able to learn the following:

- Respondent, Kellye Strickland, has a LinkedIn profile, where she identifies herself as onionmadder.xyz.

- Using this identification, there is a website associated with that name, where she posts content using the assistance of artificial intelligence.
- Within that site and contents, is a new segment which was created that begins with the protected person's name, Madeline Lee, followed by a colon and then the word cyberstalker.
- In that post, the creator recognizes herself by stating my name is Onionmadder.
- They then proceed to attach a privately drawn nudist art piece of the protected party to the website for public display while applying their opinions to it.
- Additionally, they reference the protected party's first name and last name more than two times directly and the first name more than five times directly.
- While doing so, they utilized screenshots of the protected party's social media and applied their opinions/comments to them.
- Furthermore, the creator directly references the criminal sexual conduct incident concerning the protected party publicly with wrongful information.

The protected party, Lee, advised me that she is a teacher and immediately concerned about her reputation and future potentially being damaged by the false statements made in this content by Kellye Strickland under the username of Onionmadder. She also is experiencing stress emotionally in concerns to her sensitive art piece, which she created privately, which is now exposed to the public.

After looking through all of the paperwork, I was able to determine that the website created by Onionmadder, who supposedly is Kellye Strickland, publicly references on repeatedly occasions the protected party in unwanted ways. Furthermore, these unwanted ways are having a substantial effect on the protected person's sense of security and privacy for both her future and self. She admits to feeling harassed and believes this public website is being used to indirectly contact her via social media networking sites.

I advised her I would provide her a case number and document what she has told me to further assist her. I then clarified that I would submit all the evidence she has provided me for investigations to look through more thoroughly. I then briefed her on how she may request a copy of that report to further assist her in getting the harassment restraining order adjusted per her request.

After speaking with Lee, I briefly confirmed that [Private Data] was indeed a valid and working website, however, I did not explore it nor its contents due to my lack of competence in online investigations.

All packets provided to me by Lee have been placed in the Brooklyn Park Police Department north precinct attachments bin with a sticky note of the case number.

End of report.

DISPOSITION:

UNITED STATES DISTRICT COURT

DISTRICT OF MINNESOTA

Kellye Strickland,

Case No. 0:25-cv-02056-DWF-DJF

Plaintiff,

v.

EXHIBIT B-1

Ramsey County, et al.,

Defendants.

EXCERPT OF DECEMBER 12, 2024 HARASSMENT RESTRAINING ORDER

This exhibit contains a limited excerpt of the Harassment Restraining Order, submitted for the purpose of showing the relief granted and the absence of provisions beyond those expressly listed.

- ☐ Attended public events after being notified that Respondent's presence at the events is harassing to Petitioner as follows: _____
- ☐ Used social media to harass Petitioner as following: _____
- ☒ Other: The Respondent failed to appear after service by U.S. Mail. This Order is being issued by default. The contents of the Petition are incorporated herein as findings of fact. The Petitioner's testimony was credible.
3. ☒ The harassment has or is intended to have a substantial adverse effect on the Petitioner's safety, security or privacy.
4. ☐ The relief granted by this order may be for a period of up to 50 years based on the finding that:
- ☐ The petitioner has had two or more previous restraining order in effect against the same respondent; or
- ☐ The respondent has violated a prior or existing restraining order on two or more occasions.

IT IS ORDERED:

1. ☒ Respondent shall not harass ☒ Petitioner ☐ Petitioner's minor child(ren) or ward(s)
List minor children or ward(s) included in the Petition: _____
- a. ☒ Respondent shall have no direct or indirect contact with ☒ Petitioner ☐ Petitioner's minor children or ward(s), including any visits to or phone calls to the protected person(s), contact via electronic means such as email or social networking sites, threats or assaultive behavior to the protected person(s), damaging or stealing property belonging to the protected person(s), breaking into and entering the protected person(s) residence, and/or taking pictures of a protected person without permission of the Petitioner.
- b. ☐ The relief granted does not extend to the Petitioner's minor children or ward(s). The relief requested for the Petitioner's minor children or ward(s) is denied because the harassment is not directed against the Petitioner's minor children or ward(s).
- c. ☐ Respondent is prohibited from being within _____ of Petitioner's home at _____.
Except as follows: _____
- d. ☒ Petitioner's address is confidential. If Respondent knows or learns of Petitioner's address, Respondent is prohibited from being at Petitioner's home.
- e. ☐ Respondent is prohibited from being within _____ of Petitioner's job site at _____.
Except as follows: _____
- f. ☐ Other: _____
2. ☒ Any requested relief that is not specifically listed above is denied.

UNITED STATES DISTRICT COURT

DISTRICT OF MINNESOTA

Kellye Strickland,

Case No. 0:25-cv-02056-DWF-DJF

Plaintiff,

v.

EXHIBIT C-1

Ramsey County, et al.,

Defendants.

WRITTEN NOTICE / CEASE-AND-DESIST CORRESPONDENCE

This exhibit consists of written correspondence providing notice regarding use of the Harassment Restraining Order in communications with third-party vendors and requesting cessation of related takedown efforts.

Tue, Sep 23, 2025, 4:48 PM

Kellye Sundar <kellye.sundar@gmail.com>

to

VIA EMAIL AND U.S. MAIL

Date: September 23, 2025

To:

Madeline Sally Lee (aka “Pojo Kuty”)

via

Kyle t. Manderfeld

Barna, Guzy & Steffen, Ltd.

kmanderfeld@bgs.com

200 Coon Rapids Blvd NW, Ste 400

Coon Rapids, MN 55433

Re: CEASE-AND-DESIST – Harassment, Retaliation, and Interference with Protected Speech

Ms. Lee:

I write to demand that you immediately cease and desist from the following conduct:

1. Harassment & Defamation.

- Repeating or amplifying false statements (e.g., that I sent committed “rape,” or engaged in criminal acts).
- Directing, encouraging, or coordinating others to target me online or offline.
- Contacting my family, employer, clients, or peers with accusations you know are false or made with reckless disregard for the truth.

2. Retaliatory Abuse Reports Aimed at Silencing Protected Speech.

- Initiating or coordinating abuse complaints, takedown requests, or registrar/host “suspension” requests against my domains and websites (including onionmadder.com, maddervramsey.com, pojokutty.com) which publish lawful, newsworthy content related to ongoing matters of public concern and litigation.
- Representing that any court order authorizes removal of my sites. If such an order exists, produce it immediately. To my knowledge, no valid order requires removal or suspension of my speech.

3. Interference & Intimidation.

- Direct or indirect contact intended to intimidate me, interfere with my contracts, or disrupt my access to platforms and vendors through dishonest complaints or misrepresentations.

Your actions implicate federal and state law, including but not limited to: defamation; tortious interference with contract/prospective advantage; harassment/stalking statutes; abuse of process; and retaliation for protected activity under the First Amendment and 42 U.S.C. § 1983 (when coordinated with state actors). Your recent registrar complaints appear calculated to suppress lawful speech and will be treated as retaliation.

Immediate Demands (3-day deadline)

Within 3 calendar days of this letter, please provide written confirmation that you will:

- (a) Cease initiating or coordinating abuse/takedown complaints against my domains, hosts, or platforms absent a valid court order;
- (b) Retract any prior false reports made to registrars/hosts/platforms (including Porkbun/CleanDNS) that asserted a non-existent court order or “harassment” basis;
- (c) Cease defamatory statements and targeted harassment; and
- (d) Route all future communications through counsel (Mr. Manderfeld). Do not contact me directly.

Evidence Preservation Notice

You and your agents must preserve all evidence, including: emails; texts; DMs; social media posts/stories; group-chat messages; metadata; registrar/host tickets; and drafts related to reports about me or my sites. Spoliation will be brought to the court’s attention.

No Waiver / Ongoing Litigation

Nothing herein waives any claims or remedies. This letter supplements my positions in Strickland v. Ramsey County, et al., No. 0:25-cv-02056-DWF-DJF (D. Minn.) and any related proceedings. Continued misconduct will result in further legal action, including applications for injunctive relief, sanctions, and damages.

Please confirm compliance by the deadline in a single written response from counsel.

Sincerely,

Kellye Strickland
6445 S Maple Ave, Apt 2006
Tempe, AZ 85283
(603) 892-8666
kellye.sundar@gmail.com

UNITED STATES DISTRICT COURT

DISTRICT OF MINNESOTA

Kellye Strickland,

Case No. 0:25-cv-02056-DWF-DJF

Plaintiff,

v.

EXHIBIT C-2

Ramsey County, et al.,

Defendants.

WRITTEN NOTICE / CEASE-AND-DESIST CORRESPONDENCE

Additional written notice submitted to document repeated efforts to clarify the scope of the Harassment Restraining Order and prevent third-party suppression actions.

Fri, Jan 23, 5:54 PM

Kellye Sundar <kellye.sundar@gmail.com>

to

Date: January 23, 2026

To:

Madeline Sally Lee (aka “Pojo Kutty”)
via counsel

Kyle T. Manderfeld
Barna, Guzy & Steffen, Ltd.
kmanderfeld@bgs.com
200 Coon Rapids Blvd. NW, Suite 400
Coon Rapids, MN 55433

Re: Supplemental Cease-and-Desist – Ongoing Harassment, Defamation, and Misrepresentation of Court Orders

Counsel:

This letter supplements my September 23, 2025 Cease-and-Desist, which remains fully operative and unresolved. It is prompted by continued misconduct occurring after the January 22, 2026 evidentiary hearing, including renewed misrepresentations to the court, third parties, and online audiences.

1. Continued False Assertion That an HRO Operates as a Gag Order

As you were advised previously, no Harassment Restraining Order operates as a gag order, nor does any valid order prohibit me from publishing truthful, lawful information concerning matters of public concern, litigation, or my own experiences.

Your client continues to:

- Represent—explicitly or by implication—that the HRO bars my speech;
- Characterize lawful publication as “violations” of the order; and
- Encourage third parties to treat protected speech as contemptuous or unlawful.

These assertions are false. Repeating them after notice constitutes knowing misrepresentation.

2. New Defamatory Narratives Based on January 22, 2026 Hearing

Following the January 22 evidentiary hearing, your client and her associates have disclosed and distorted private information that could only have been learned during that proceeding, including false characterizations involving alleged “sexual images.”

To be clear:

- No post-hoc reframing of testimony converts protected speech into harassment;
- Misstating what occurred in a sealed or limited-access hearing to inflame third parties is defamatory; and
- Dissemination of false sexualized allegations is particularly egregious and actionable.

3. Ongoing Third-Party Harassment by Known Associates

Your client’s associates—particularly through Facebook and related platforms—are continuing to harass me using private, hearing-derived information, coupled with defamatory narratives your client has promoted.

Whether this conduct is directed, encouraged, or knowingly tolerated, it remains attributable where your client is the source of the information or narrative.

3(a). Specific Instance of Hearing-Derived Third-Party Harassment

By way of example, immediately following the January 22, 2026 evidentiary hearing, a close personal associate of your client published statements about me on a public social-media platform that included assertions concerning:

- Alleged fines, sanctions, or criminal exposure;
- Assertions about events inside the January 22 Zoom hearing; and
- Claims regarding my being “cut off” or silenced during that proceeding.

This information was not publicly available, was not reflected in any written order, and could only have been known by a person present for or directly informed about the hearing itself. The timing of the publication—occurring the same day as the hearing—underscores that the source of this information was contemporaneous and direct.

I do not speculate as to intent. However, the dissemination of non-public, hearing-derived information to third parties, followed by public harassment and defamatory commentary, is improper and actionable. Where such information originates with a litigant and is then used by known associates to target the opposing party, the conduct is attributable.

4. Counsel Is Now on Actual Notice

You are now on explicit notice that:

- The HRO is not and has never been a gag order;
- Your client’s statements about my speech are false;

- Post-hearing disclosures and distortions are occurring; and
- Third-party harassment based on those distortions is ongoing.

Any further repetition—to courts, platforms, registrars, or third parties—will be treated as knowing misconduct after notice.

5. Escalating Risk Created by Public Amplification

I further note that the ongoing pattern of public commentary, third-party amplification, and misrepresentation creates compounding legal exposure that is not mitigated by continued litigation activity. The conduct at issue appears increasingly oriented toward public narrative and online attention rather than resolution or compliance with court process.

This dynamic materially increases risk: statements made for public consumption are discoverable, timestamped, and readily attributable. Continued amplification by associates—particularly when grounded in non-public hearing information—creates an expanding evidentiary record that cannot be undone and that may expose additional parties to liability.

You are best positioned to advise your client accordingly.

Renewed Demands (Immediate)

Your client must immediately:

1. Cease representing that any court order restricts my protected speech;
2. Cease disseminating or encouraging false narratives derived from the January 22 hearing;
3. Cease third-party harassment and retract false statements already made; and
4. Preserve all evidence related to these communications, including social-media posts, messages, drafts, and platform complaints.

No Waiver

Nothing herein waives any claims or remedies. This notice supplements the September 23, 2025 Cease-and-Desist and my positions in *Strickland v. Ramsey County, et al.*, No. 0:25-cv-02056-DWF-DJF (D. Minn.) and related proceedings.

Please confirm compliance in writing. No direct contact is authorized.

Sincerely,

Kellye Strickland
6445 S. Maple Ave., Apt. 2006
Tempe, AZ 85283
(603) 892-8666
kellye.sundar@gmail.com

UNITED STATES DISTRICT COURT

DISTRICT OF MINNESOTA

Kellye Strickland,

Case No. 0:25-cv-02056-DWF-DJF

Plaintiff,

v.

EXHIBIT C-3

Ramsey County, et al.,

Defendants.

WRITTEN NOTICE / CEASE-AND-DESIST CORRESPONDENCE

Written notice submitted as evidence of continued communication regarding
misuse of state-court orders in third-party complaints.

Tue, Sep 30, 2025, 12:33 PM

Kellye Sundar <kellye.sundar@gmail.com>

to

Hello Porkbun Legal,

I'm writing to close the loop on the latest abuse report submitted by Madeline S. M. Lee about my domains.

Key facts (on record):

Pattern: Ms. Lee has harassed me continuously since July 31, 2024, using police, courts, and now registrar workflows to try to silence a lawful legal archive. These complaints have correlated with real-world threats against me.

Second registrar attempt: On Sept 29, 2025, she filed another "harassment/PII" complaint about material she herself put into public court records and distributed on her public channels.

Address is outdated: In a sworn court filing this month, Ms. Lee stated she has moved and has updated her address with the court under seal. Her abuse complaint to Porkbun relies on an old address she previously published herself. It is not private, and it is not current.

Requests/Directives to Porkbun:

1. Do not take any registrar action on my domains absent a signed court order expressly naming my domains.
2. Preserve all records of Ms. Lee's complaints and any related communications (submissions, attachments, IPs, timestamps, internal notes, CleanDNS tickets, and contacts from third parties acting for her).
3. Please stop forwarding her repetitive, bad-faith complaints as "requests" to modify content. Porkbun is a registrar, not my host, and has no authority to order edits to site content.

For clarity: I have already issued cease-and-desist notices to Ms. Lee and her counsel. I am currently on an anniversary trip and do not intend to litigate against a registrar; however, if your abuse workflow continues to be used as a harassment tool after this notice, I will protect my rights.

Regards,

Kellye Strickland

onionmadder@gmail.com

Owner: onionmadder.com / onionmadder.xyz / maddervramsey.com / nodehole.com

UNITED STATES DISTRICT COURT

DISTRICT OF MINNESOTA

Kellye Strickland,

Case No. 0:25-cv-02056-DWF-DJF

Plaintiff,

v.

EXHIBIT C-4

Ramsey County, et al.,

Defendants.

WRITTEN NOTICE / CEASE-AND-DESIST CORRESPONDENCE

Written notice submitted to document ongoing objections to third-party takedown efforts referencing contested orders.

Thu, Jan 29, 6:05 AM (11 days ago)

Kellye Sundar <kellye.sundar@gmail.com>

to

Counsel,

This is a follow-up to my January 23, 2026 Supplemental Cease-and-Desist, which you have not acknowledged.

I write to place you on explicit notice regarding the Brooklyn Park Police Department report you referenced during the December 29, 2025 hearing and which was later relied upon to justify contempt. That report expressly states that no direct violation of the Harassment Restraining Order was identified, and that the order does not explicitly address the online conduct described. The report was documented and closed without enforcement action.

Reliance on the existence of this report—rather than its contents—as evidence of violation, defiance, or contempt mischaracterizes the record. A documentation-only police report that affirmatively identifies no violation cannot lawfully support a contempt finding.

You were previously placed on notice of these same limitations on September 25, 2025, when Porkbun's legal counsel independently reviewed the site at issue and declined removal after three separate complaints, finding no violation of law or policy. On that same date, I issued a cease-and-desist letter addressing the continued false characterization of lawful speech, which you likewise did not acknowledge or act upon.

You are now on actual notice—from multiple independent sources—that neither the police documentation nor the hosting provider's legal review supports the assertions being made. Any continued reliance on these materials as evidence of contempt, or repetition of those characterizations to courts, platforms, or third parties, will be treated as knowing misrepresentation after notice.

This correspondence supplements my prior notices. Please confirm compliance in writing.

Kellye Strickland

kellye.sundar@gmail.com

UNITED STATES DISTRICT COURT

DISTRICT OF MINNESOTA

Kellye Strickland,

Case No. 0:25-cv-02056-DWF-DJF

Plaintiff,

v.

EXHIBIT C-5

Ramsey County, et al.,

Defendants.

WRITTEN NOTICE / CEASE-AND-DESIST CORRESPONDENCE

Written notice submitted to document escalation and continued third-party complaints following prior notice.

8:50AM (35 minutes ago)

Kellye Sundar <kellye.sundar@gmail.com>

to

To:

Kyle T. Manderfeld
Barna, Guzy & Steffen, Ltd.

Re: Repeated written notice; continued reliance on mischaracterized materials
Counsel,

This correspondence follows my September 23, 2025, January 23, 2026, and January 29, 2026 cease-and-desist notices, each of which placed you on explicit written notice regarding the limitations of the materials you have cited in support of alleged violations and contempt.

You have not acknowledged any of these notices.

You are now on repeated, documented notice of the following:

1. The Brooklyn Park Police Department report referenced during the December 29, 2025 hearing documented no direct violation of the Harassment Restraining Order and resulted in no enforcement action.
2. Independent legal review by a hosting provider declined removal of the website at issue after multiple complaints and found no violation of law or policy.
3. The Harassment Restraining Order does not operate as a gag order and does not prohibit lawful documentation, commentary, or publication concerning public proceedings or matters of public concern.

Continued reliance on the existence of these materials—rather than their contents—as evidence of violation, defiance, or contempt mischaracterizes the record.

Any repetition of these characterizations to courts, law enforcement, platforms, registrars, or third parties after written notice constitutes knowing misrepresentation of the underlying record.

You are further instructed to preserve all materials relating to:

- Communications referencing my websites, publications, or online activity
- Contacts with hosting providers, registrars, or third-party platforms
- Internal strategy discussions regarding complaints, takedown requests, or contempt framing
- Drafts, messages, and social-media communications relating to these matters

This is a litigation preservation notice.

Nothing in this correspondence waives any rights, claims, or remedies. The record now reflects repeated written notice, lack of acknowledgment, and continued reliance on disputed characterizations.

Govern yourself accordingly.

Kellye Strickland

kellye.sundar@gmail.com