

**FILED**

State of Minnesota

APR 14 2017

District Court

County of Ramsey	BY 	Judicial District:	Second
		<del>DEPUTY</del> Number:	02HRCV17233
		Case Type:	Harassment

**Petitioner's Affidavit and Petition for Harassment Restraining Order**  
(Minn. Stat. § 609.748)

**Petitioner**

Name: Lindsey Middlecamp
Address: Confidential
Date of Birth:
On behalf of: (names of minor children who are victims of harassment and their dates of birth)
Name: _____ DOB: _____
Name: _____ DOB: _____
Name: _____ DOB: _____

vs.

**Respondent**

(Person harassing you or your minor child):
Name: Brock Fredin
Address
St. Paul, MN
Date of Birth:
(if known, or approximate age)

STATE OF MINNESOTA )  
COUNTY OF RAMSEY ) SS  
(County where affidavit is signed)

I understand that I must tell the truth. I state that:

1. I am the Petitioner in this case. The victim of the harassment is  me  a minor child for whom I am the parent, legal guardian or stepparent. (If you are the guardian, attach a copy of the order appointing you.) The name of each victim, other than me, is: N/A; filing on my own behalf.

How does each victim know the Respondent and what is their relationship? See Below.

If you are filing on behalf of another person, what is your relationship to each victim? N/A; filing on my own behalf.

2. a) How many restraining orders have been in effect, ordering Respondent to stay away from the victims you included at #1 above?  none  one  two or more. For each restraining order provide:

Court File Number, if known	County and State where the court is located
N/A	

b) Does Respondent have a current Harassment Restraining Order or Order for Protection against you?

Yes, Case File Number (if known) \_\_\_\_\_  No, I am not aware of any.

3. The following court cases involve me and the Respondent in issues of child custody or parenting time:

Court File Number	County and State where the court is located
N/A	

4. Respondent has harassed the victim(s) as follows:

- *Check all boxes that apply and give the date and details of each incident.*
- *To get a Restraining order, you must describe actions that meet the legal definition of harassment in Minnesota. See the Instructions for the definition of harassment.*
- *If you need more space, attach a full sheet of paper and continue your description there. Do not write on the back.*

Respondent physically or sexually assaulted the victim as follows: N/A

Respondent has followed, pursued or stalked the victim as follows:

I have never met Respondent in person. In late January 2017, after reading a Minnesota Court of Appeals decision upholding a restraining order against Respondent and hearing through mutual friends of a second active restraining order against him, I posted content on a personal, anonymous social media account identifying Respondent as a local man with two restraining orders against him. This post was made on a twitter account that is not and has never been associated with my real life identity, my surname, or my employer; rather, it is a personal activism and awareness-raising account focused on issues of gender violence, domestic and sexual violence and gender equality. I did not direct the post to Respondent or tag him or in any manner attempt to communicate with Respondent or garner his attention.

In apparent retaliation, Respondent has, over the course of several months, undertaken significant efforts to pursue my private personal identifying information by various means, including but not necessarily limited to, finding newspaper articles about anonymous activism projects associated with my twitter account and contacting the journalists believed to know my real name and contact information.

On February 1, 2017, after learning of at least one attempt to determine my identity and contact information through a journalist who had previously interviewed me on a first-name basis only, I emailed Respondent from my anonymous email address informing him that his attempts to find my personal information carried threatening connotations and appeared to be made for the purpose of harassment. I notified Respondent in that email that “In light of the documented history of harassing tactics you have engaged in against other local women I will take any necessary legal steps to protect myself in the event of any further contact or indicators of contact to others about me, or if you publish knowingly defamatory statements via other means.”

Respondent did not stop his pursuit of my personal information, and after eventually obtaining my real name and the identity of my former employer, Respondent continued to pursue and obtain additional private information (including my current employer, which I have gone to great lengths to omit from all online presence and media appearances and which my employer protects as a matter of data privacy) instilling in me a reasonable fear that Respondent is obsessively pursuing and stalking me electronically.

Respondent made uninvited visits to the victim as follows: None known

Respondent made harassing phone calls to the victim as follows: None known.

Respondent made threats to the victim as follows:

Since discovering my personal identifying information, Respondent has engaged in the following threatening behavior:

On April 4, 2017, Respondent published a public post on social media identifying me (and two other women who already have restraining orders against Respondent) by full name, attributing his inability to obtain employment to me for sharing media coverage of his history of harassment, and expressing the following threatening language: **“I have exhausted most**

**peaceful lawful options...” “I will be relentless and merciless until such time their conduct ceases.”** (Emphasis added.)

Beginning on April 6, 2017 a twitter account created and maintained by Respondent began tweeting directly to my law school, my local bar associations, other local law firms, and by April 10, 2017, individual persons associated with my place of employment, identifying me by full name and place of employment and accusing me of criminal conduct.

On April 10, Respondent published a public post on social media indicating a belief that I caused or contributed to his mother having a stroke. In that post, he again uses my full name and lists my place of employment, and states “Everyday [sic] that passes is another family harmed by Lindsey Middlecamp and [additional names of harassment victims redacted].” (Emphasis added.)

On April 13, 2017, a professional colleague notified me of a website that Respondent had created, lindseymiddlecamp.com, which publishes a picture of my face, my name, my current and former employer, and which includes a number of false and defamatory statements echoing those made on his twitter account, including accusations that I engage in criminal misconduct. The website also lists and, where available, identifies the employers of individuals who have interacted favorably with my anonymous twitter account on social media. The website states it is “Paid For By The Committee To Remove Lindsey Middlecamp,” which language is threatening. The website also echoes the threatening statement from Respondent’s facebook page, “Everyday that passes is another family harmed by Lindsey Middlecamp.”

Also on April 13, 2017, a friend contacted me to say that he had been contacted through his organization’s website on April 12, 2017 with a threatening message identifying me by name, place of employment, and accusing me of criminal misconduct. On information and belief, the sole catalyst for that contact was that I had posted a favorable comment earlier that same day about the organization (a local sauna club). This confirms that Respondent is stalking everything I post on social media and, where possible, making contact with third parties to harass and defame me, all in an apparent effort to instill fear in me.

Respondent frightened the victim with threatening behavior as follows: See above. Respondent’s escalating, obsessive publishing of personal information and accusations of criminal misconduct, and his demonstration of a willingness to research and publicize my

private personal information, make me fear for my physical safety as well as my electronic privacy.

- Respondent broke into and entered the victim's residence as follows: N/A
- Respondent damaged the victim's property as follows: N/A
- Respondent stole property from the victim as follows: N/A
- Respondent took pictures of the victim without permission as follows: N/A
- Respondent shared private sexual images of the victim without permission as follows: N/A
- Respondent used the victim's personal information, without consent, to invite, encourage, or solicit a third party to engage in a sexual act with the victim as follows: N/A
- More than once, Respondent has done acts that meet the legal definition of "targeted residential picketing" by: N/A
- I told Respondent not to come to certain public events that I or the children attend because: N/A  
After that, Respondent attended public events I/we attended: (List dates, places and name of events)  
N/A  
These acts by Respondent show a pattern of attending public events while knowing that attending is harassing to me/children.
- Other:

5. Describe the effect the harassment has upon the victim's safety, security or privacy:

Respondent's harassment is causing me significant distress and is having a strong adverse effect on my sense of safety, security, and privacy: knowing that Respondent knows where to find me during the day and assuming he has already discovered my home address as well, paired with the knowledge that Respondent persists in a belief that I am personally responsible for significant financial, familial, or health challenges in his life, cause me great concern for my safety. His ongoing campaign to publish personal identifying information I have spent years keeping offline and out of the media, and his efforts to contact anyone believed to be associated with me or my employment, raise further concerns for my security and privacy. I am afraid that

Respondent's next escalation may be to begin appearing at events or places he expects me to be, and potentially, violence.

6. Do you believe the harassment will continue? Why?

Yes. In addition to the multiple months invested so far in Respondent's focus on uncovering and distributing information about me, and the two women who have obtained restraining orders against Respondent in the past and continued to experience third party or indirect harassment, I have learned of several other local women who have experienced months upon months of cyberstalking and targeted harassment by Respondent, as well as a woman who accused and attempted to press charges against him for rape. Nothing about Respondent's behavior makes me believe he will be deterred by anything short of unequivocal legal protection.

7. I ask the Court to issue a Restraining Order as follows: *Check all boxes (a through e) that apply.*

a. Respondent shall not harass  me  minor child (ren) for whom I am the parent, legal guardian, or stepparent. List the full names of the minor children included in this Petition: \_\_\_\_\_

b. Respondent shall have no contact with  me  the minor child(ren) listed above.

c. Respondent shall stay away from where I/we live (address) Within 1,000 feet of  
- vicinity near confidential home address.

d. Respondent shall stay away from my/the victim's job site located at 350 S. 5th St,  
Minneapolis, MN (City Hall) (excepting official city business) for the purpose of  
contacting petitioner.

e. Other: Respondent shall remove postings on social media and websites under Respondent's control publishing my private identifying information (surname and place of employment) and shall not contact third parties attempting to distribute such information.  
Respondent shall relinquish the domain name lindseymiddlecamp.com.

8. Court Hearing

*Petitioner: Read these Notices about a Hearing*

- You have a right to request a court hearing.*
- If the Judge dismisses your case because it has no merit, no hearing will be held.*
- The Judge can issue a Restraining Order without a court hearing if the Judge finds there is immediate and present danger of harassment.*
- If the Judge issues a Restraining Order without a hearing, the Respondent can request a hearing within 45 days of the date the Restraining Order is issued. If Respondent*

requests a hearing, the court will notify you by mail at least five days before the hearing date.

- If there is a hearing, you must attend the hearing and prove that the statements in your Petition & Affidavit are true, and that Respondent's actions are harassment, as defined by Minnesota law.

Choose a. or b.

- a. I am not requesting a court hearing at this time.

But if the court denies my request for a restraining order because the court finds there is no immediate and present danger of harassment, then (check one)  I want  I don't want a court hearing.

OR

- b. I am requesting a court hearing.

9. I request a Restraining Order for a length of:

- 2 years  
 Until the following date: \_\_\_\_\_, which is less than 2 years from today.  
 Up to 50 years because:  
 I have two or more prior restraining orders against Respondent (listed at #2 above.)  
 Respondent has violated a prior or existing restraining order between us on two or more occasions.

**I understand the court will likely schedule a court hearing for any request over 2 years.**

I declare under penalty of perjury that everything I have stated in this document is true and correct. Minn. Stat. § 358.116.

Dated: 4/14/17

Signature

Name Lindsey Middlecamp

Address \_\_\_\_\_

City/State/Zip \_\_\_\_\_

Telephone (\_\_\_\_\_) \_\_\_\_\_

E-mail address: \_\_\_\_\_

**Notice:** If your address or telephone changes, you must give Court Administration your new information right away, in writing.