

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

REBEKAH KATHERINE BREWIS,)	
)	
Plaintiff, Pro Se,)	Case No. 1:25-cv-03513
)	
v.)	Judge Sara L. Ellis
)	
PETERSON FARMS FRESH, LLC;)	Magistrate Judge
AARON LEROY PETERSON,)	Daniel P. McLaughlin
a/k/a R.J. ELLIOT, et al.,)	
)	
Defendants.)	

**PLAINTIFF'S MOTION FOR PROTECTIVE ORDER AGAINST HARASSMENT,
STALKING, RETALIATION, AND UNAUTHORIZED PUBLIC DISCLOSURE**

Filed Pursuant to FRCP 26(c), 18 U.S.C. § 1514, and the Court's Inherent Authority

Plaintiff Rebekah Katherine Brewis ("Plaintiff"), proceeding pro se, respectfully moves this Court for entry of a Protective Order against harassment, stalking, retaliation, and unauthorized public disclosure, and in support thereof states as follows:

A. Introduction

1. This motion seeks comprehensive protective relief necessitated by a documented pattern of cross-platform cyberstalking, institutional intimidation, and coordinated harassment directed at Plaintiff by individuals associated with Defendants — including individuals who are not parties to this action but who act in concert with Defendants and who possess institutional access to federal

law enforcement, the National Rifle Association political apparatus, and the Department of Homeland Security.

2. Specifically, Plaintiff has been subjected to documented cyberstalking by Mark V. Peterson, brother of Defendant Aaron Leroy Peterson, who stalked Plaintiff across multiple social media platforms — including Facebook (late 2024 through early 2025) and Instagram (June 2025) — during the period surrounding Plaintiff's federal complaint filing. Mark Peterson is not a private individual acting alone. He is a professional hunter and expert marksman, the Owner and Chairman of Worldwide Trophy Adventures, a member of the NRA Hunters' Leadership Forum President's Founders Club, and the host of two nationally broadcast hunting programs on the Pursuit Channel. His company, Worldwide Trophy Adventures, sponsored DHS Secretary Kristi Noem's 2023 NRA Distinguished Hunters Leadership Award ceremony at the 152nd NRA Annual Meetings in Indianapolis.

3. The convergence of Mark Peterson's demonstrated hostility toward Plaintiff, his professional expertise with lethal weapons, and his documented personal and financial relationship with the Secretary of the Department of Homeland Security — the very agency Plaintiff alleges has conducted unlawful surveillance against her — creates a credible and ongoing threat to Plaintiff's physical safety that constitutes witness intimidation within the meaning of 18 U.S.C. § 1512.

B. Legal Standard

4. Federal Rule of Civil Procedure 26(c)(1) provides that a court may, for good cause, issue an order to protect a party from "annoyance, embarrassment, oppression, or undue burden or expense." Courts have broad discretion to fashion protective orders to prevent harassment and

intimidation of parties and witnesses. See *Seattle Times Co. v. Rhinehart*, 467 U.S. 20, 36 (1984).

5. Title 18 U.S.C. § 1514 authorizes federal courts to issue civil protective orders upon a showing that the intimidation of, or retaliation against, a victim or witness in a federal case is likely. Congress enacted § 1514 specifically to protect witnesses and victims from the type of conduct at issue here.

6. Federal courts also possess inherent authority to protect parties and witnesses from harassment, intimidation, and abuse of the litigation process. See *Chambers v. NASCO, Inc.*, 501 U.S. 32, 43–44 (1991).

C. Factual Basis

7. ***Cross-Platform Cyberstalking by Mark V. Peterson.*** Plaintiff possesses screenshot evidence documenting that Mark V. Peterson monitored, tracked, and engaged with Plaintiff's social media activity on at least two separate platforms — Facebook and Instagram — across a period spanning late 2024 through June 2025. This conduct coincided with the period during which Plaintiff filed her federal complaint (January 2025), was pressured into an unconscionable settlement (September–October 2025), and challenged that settlement (January 2026). Plaintiff incorporates by reference the Declaration of Rebekah Katherine Brewis filed contemporaneously herewith (Dkt. # __), which details this stalking conduct.

8. ***Implied Threat of Physical Violence.*** Mark Peterson's professional identity is defined by the use of lethal weapons. He hosts nationally broadcast hunting programs showcasing his expert marksmanship. He maintains institutional relationships with the NRA's political influence apparatus. His company donates high-value hunting expeditions — including Alaska bear hunts

aboard luxury yachts — to NRA auctions. When a professional hunter with this profile repeatedly monitors the online activity of a disabled, indigent, pro se trafficking victim who is suing his brother, the implied threat of physical violence is not speculative. It is reasonable, credible, and deeply intimidating.

9. *NRA-to-Noem-to-DHS Pipeline.* Mark Peterson's institutional connections do not end with the NRA. His company, Worldwide Trophy Adventures, sponsored DHS Secretary Kristi Noem's NRA Distinguished Hunters Leadership Award. Secretary Noem publicly described their relationship as a personal friendship. Secretary Noem now oversees the very federal law enforcement apparatus — ICE, CBP, and all immigration enforcement — that Plaintiff alleges has been weaponized against her through unlawful surveillance. The pipeline from Mark Peterson to the NRA to Secretary Noem to DHS creates a reasonable basis to believe that harassment by Mark Peterson carries the implicit threat of federal law enforcement retaliation — a threat that transforms private stalking into institutional witness intimidation.

10. *Broader Pattern of Harassment and Retaliation.* The cyberstalking by Mark Peterson occurs within a broader pattern of coordinated conduct designed to intimidate, silence, and destabilize Plaintiff, including: (a) Defendant Aaron Peterson's use of the fictitious identity "R.J. Elliot" to monitor Plaintiff on Facebook, as discovered on February 17, 2024; (b) the coerced settlement executed while Plaintiff was institutionalized, which included an evidence destruction clause and overbroad confidentiality provisions designed to silence Plaintiff; (c) documented interference with Plaintiff's government benefits, healthcare access, and housing stability; and (d) the sale of the \$3,000,000 Highland Drive property to insider Greyson R. Carlson forty-one days after the settlement, evidencing consciousness of liability and asset dissipation.

D. Good Cause Exists for Protective Relief

11. Good cause for a protective order exists where the moving party demonstrates "a particular and specific need for protection." *Gulf Oil Co. v. Bernard*, 452 U.S. 89, 102 n.16 (1981). Plaintiff's need is neither general nor speculative. It is documented by screenshot evidence, corroborated by the institutional profiles of the actors involved, and contextualized within a broader pattern of conduct that includes coerced settlement, asset dissipation, evidence destruction provisions, benefits sabotage, and coordinated cyberstalking.

12. The Court should weigh the following factors in assessing good cause: (a) the extreme power disparity between Plaintiff — an indigent, disabled, neurodivergent, pro se trafficking victim — and the Peterson family enterprise, which controls the largest employer in Oceana County, multiple LLCs, a \$3,000,000+ real estate portfolio, a nationally broadcast media platform, and documented access to the NRA and DHS through Secretary Noem; (b) the documented willingness of individuals associated with Defendants to engage in surveillance, cyberstalking, and institutional pressure; and (c) the TVPA's express remedial purpose of empowering trafficking victims to report, investigate, and litigate trafficking claims without fear of retaliation. See 18 U.S.C. § 1595(a).

E. One-Sided Public Disclosure Restriction

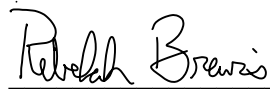
13. Plaintiff further requests a one-sided restriction prohibiting Defendants, their counsel, family members, agents, and associates from making public statements that disclose Plaintiff's protected health information, residential location, or that disparage Plaintiff's mental capacity, credibility, or character. This restriction is justified by: (a) the inherent power imbalance described above; (b) Defendants' documented use of confidentiality provisions to silence a trafficking victim; and (c) the TVPA's remedial purpose.

14. Plaintiff retains her full First Amendment right to speak publicly about her claims, her trafficking experience, and the progress of this litigation, consistent with this Court's declaration voiding the Confidentiality Agreement as applied to TVPA claims.

F. Relief Requested

15. Plaintiff respectfully requests that this Court enter the Proposed Protective Order filed contemporaneously herewith, which provides for: (a) a no-contact order binding named individuals and their associates; (b) anti-harassment and anti-stalking protections, including a specific prohibition on firearms-related intimidation; (c) anti-retaliation and witness tampering prohibitions under 18 U.S.C. §§ 1512, 1513; (d) protections against government actors operating in concert with Defendants; (e) one-sided public disclosure restrictions; and (f) contempt enforcement mechanisms.

Respectfully submitted,



Rebekah Katherine Brewis

Plaintiff, Pro Se

680 N. Lake Shore Drive, Suite 110-1901

Chicago, Illinois 60611

Telephone: (872) 222-7490

Email: owner@aeroswift.org

Dated: February 26, 2026

CERTIFICATE OF SERVICE

I, Rebekah Katherine Brewis, hereby certify that on February 26, 2026, I caused a true and correct copy of the foregoing to be served upon all counsel of record via the Court's CM/ECF electronic filing system, which will send notification of such filing to the following:



Rebekah Katherine Brewis

Plaintiff, Pro Se

Counsel for Defendants:

Brion B. Doyle

Neil E. Youngdahl

VARNUM LLP

333 Bridge Street NW, Suite 1700

Grand Rapids, Michigan 49504

bbdoyle@varnumlaw.com

neyoungdahl@varnumlaw.com

Michael J. Grant

John H. Andreasen

TABET DIVITO & ROTHSTEIN, LLC

209 South LaSalle Street, 7th Floor

Chicago, Illinois 60604

mgrant@tdrlawfirm.com

jandreasen@tdrlawfirm.com