

STATE OF MINNESOTA
COUNTY OF ANOKA

DISTRICT COURT
JUDICIAL DISTRICT
Case Type: Other Civil
Judge Sean Gibbs

Marcus Rushing,

Court File No. 02-CV-26-1141

Plaintiff,

vs.


And


And

Jeffrey Smith,

And

Christ Temple Apostolic Church,

Defendants.

AMENDED COMPLAINT

I. PREFATORY MATTERS

1. This action arises from a coordinated pattern of false accusations, public defamation, misuse of legal procedures, harassment, and destruction of evidence directed at Plaintiff by Defendants.
2. Beginning in approximately April 2025 and escalating through January 2026, Defendants engaged in conduct designed to falsely portray Plaintiff as an abuser, damage Plaintiff's reputation, interfere with Plaintiff's relationship with his children, and deprive Plaintiff of housing, communications, and access to evidence.
3. The conduct included, among other things:
 - A. Publishing and republishing false allegations of domestic violence;

- B. Encouraging or amplifying those accusations within a church community;
- C. Misusing restraining-order procedures;
- D. Public humiliation and separation of Plaintiff from his young children;
- E. Repeated harassment and provocation;
- F. Disclosure of Plaintiff's protected location information despite Plaintiff's participation in the Minnesota Safe-At-Home program; and
- G. Destruction, deletion, or concealment of electronic evidence relevant to foreseeable litigation.

4. In addition to the conduct described above, Plaintiff encountered **significant clerical and procedural irregularities** during related proceedings involving subpoenas and case dismissal.
5. Plaintiff sought issuance of a subpoena for records relevant to the allegations made against him and to preserve evidence relating to communications between Defendants and third parties.
6. The subpoena process was subject to **clerical inconsistencies and irregular handling**, which delayed or interfered with Plaintiff's ability to obtain evidence.
7. Plaintiff further observed **procedural irregularities relating to dismissal or handling of filings** in the related proceeding.
8. These irregularities occurred in the context of ongoing litigation and had the effect of **limiting Plaintiff's access to evidence and delaying his ability to fully present his claims and defenses**.
9. Plaintiff includes these allegations to provide context regarding the **procedural obstacles encountered while attempting to obtain and preserve relevant evidence**.
10. Plaintiff does not assert claims against court personnel but alleges that these irregularities materially affected the procedural posture of the related proceedings.
11. As a direct and proximate result of Defendants' actions and the circumstances surrounding the related proceedings, Plaintiff has suffered severe emotional distress, reputational harm, loss of housing, interference with parental relationships, and other damages.

II. TIMELINE AND CONTEXT OF RELATED FEDERAL LITIGATION

12. The following allegations provide chronological context regarding ongoing federal litigation and related events relevant to Plaintiff's claims for abuse of process, spoliation of evidence, and related misconduct.
13. At the time the events described in this complaint occurred, Plaintiff had initiated federal litigation concerning matters related to the conduct of certain Defendants and associated parties.
14. The existence of this litigation placed Defendants on notice that communications, social media posts, electronic messages, and other records could become relevant evidence.

15. Despite that notice, Defendants engaged in conduct that resulted in the deletion, concealment, or loss of relevant electronic records.

16. During this period Plaintiff also maintained a personal website through which he documented events, communications, and publicly observable information relating to the dispute.

17. The website served as a repository for screenshots, records, and contemporaneous documentation of statements and events relevant to the disputes between the parties.

18. Defendants were aware, or reasonably should have been aware, that Plaintiff was documenting events and preserving evidence relating to the conduct at issue.

19. The existence of the website further placed Defendants on notice that their statements and actions could be subject to public scrutiny and legal review.

20. Despite this context, Defendants proceeded to publish statements accusing Plaintiff of domestic violence and abuse.

21. Those statements were made after the federal litigation had begun and after disputes between the parties had escalated.

22. At various points during the dispute, court orders permitted or required Plaintiff to retrieve personal property or access the marital residence.

23. Despite those orders, Plaintiff did not enter the residence.

24. Plaintiff avoided entering the home in order to prevent escalation of conflict and to avoid creating circumstances that could be mischaracterized or used to support further accusations.

25. Plaintiff instead attempted to comply with court directives through cautious and limited actions intended to minimize conflict.

26. Plaintiff's decision not to enter the home despite court authorization demonstrates Plaintiff's effort to avoid confrontation and prevent further allegations.

27. Defendants nevertheless continued to make statements suggesting that Plaintiff posed a threat or had engaged in abusive conduct.

28. During this same period, Defendants deleted social media accounts, cancelled shared communication services, and removed Plaintiff's access to electronic records.

29. These actions occurred after litigation had begun and after Defendants knew or reasonably should have known that such materials were relevant to pending or anticipated legal proceedings.

30. The timing of these deletions and access restrictions supports the inference that Defendants sought to eliminate or conceal evidence relevant to the dispute.

31. Plaintiff incorporates these facts to provide context for the claims asserted in this complaint, including claims for abuse of process, defamation, and spoliation of evidence.

III. PARTIES

32. Plaintiff is an adult individual and parent who is a participant in the Safe-At-Home Program and is now homeless. His last place of residence was at marital home in Dakota County, MN.

[REDACTED]

[REDACTED]

35. Defendant Jeffery Smith, hereinafter referred to as “Defendant Pastor”, is an adult individual and pastor of Defendant church that is located in Anoka County, MN.

[REDACTED] Temple Apostolic Church is a religious organization operating in Anoka County, MN.

37. At all relevant times, Defendants acted individually and, in certain respects, in concert.

IV. JURISDICTION AND VENUE

38. Jurisdiction and venue are proper in Anoka County pursuant to Minn. Stat. §542.09 and Minn. Stat. § 484.01.

39. The acts and omissions giving rise to this action occurred in Anoka County, MN.

40. Plaintiff is a Minnesota resident and a participant in the Minnesota Safe at Home program.

41. This Court has jurisdiction over this action pursuant to Minn. Stat. §543.19 because the Defendants’ tortious conduct occurred in Minnesota and caused harm to Plaintiff in Minnesota.

IV. FACTUAL ALLEGATIONS

A. Background and Safe at Home Status

42. Plaintiff incorporates the preceding paragraphs as if fully set forth herein.

[REDACTED]

[REDACTED]

45. Plaintiff was enrolled in Minnesota's Safe-at-Home program, which provides address confidentiality protections intended to prevent disclosures of a participant's residence and location information.

46. As a result of repeated threats, harassment, and retaliatory actions by the Defendants and their agents in connection with the ongoing federal litigation, the Plaintiff was enrolled in the Safe-At-Home program to protect his personal safety and prevent further intimidation. One such threatening communication from employer McGaw Medical Center of Northwestern University stated:

"I know that a big part of your [Plaintiff's] character is seeking truth, and it may feel disingenuous to endorse anything that you disagree with. But it will bite you in the ass if you don't learn to concede to the group, even if they are wrong. You can be completely right, and it won't matter if people have already turned against you. **It is a dangerous world for a Black man, and you can't afford to make it more dangerous for yourself by being unable to let things go**"

47. Plaintiff expressly informed Defendant Partner on multiple occasions that disclosure of his residence, schedule, or location to third parties could compromise those protections and create safety risks.

48. Plaintiff was enrolled in the Safe-At-Home address confidentiality program due to safety concerns arising from ongoing federal litigation involving Plaintiff and his former employers.

49. At all relevant times, Defendants were aware, or reasonably should have been aware, that Plaintiff's address and location information were protected under the Safe-At-Home program.

50. Despite this status, Defendants and individuals associated with the Defendant Church appeared at the marital residence and engaged in conduct that compromised Plaintiff's privacy and safety protections.

B. Federal Employer Litigation Context

51. Defendant Partner's Answer, purportedly submitted on or about March 4, 2026, and entered on the public docket on or about March 5, 2026, referenced ongoing federal litigation between Plaintiff and his former employers, including McGaw Medical Center of Northwestern, University, HealthPartners, and Wood Health Company.

 and Defendant Pastor Jeffery Smith had knowledge of this

53. Defendant Pastor Jeffery Smith was aware of the federal litigation prior to the events described in this complaint. When Plaintiff experienced alleged retaliation from employers that affected his ability to obtain work, Plaintiff met with Defendant Pastor Jeffery Smith seeking assistance in securing employment.

54. Defendant Pastor Jeffery Smith represented that he would assist Plaintiff in securing employment. However, despite repeated requests for follow-up, no assistance was provided, and

the interactions resulted in Defendant Pastor obtaining information regarding Plaintiff's ongoing federal litigation.

55. Defendant Pastor Jeffery Smith, did however, assist Defendant Partner in securing employment.

56. Each of Plaintiff's federal cases remained active prior to the issuance of a restraining order on or about January 5, 2026.

57. Following the issuance of the restraining order, and during a period in which the Plaintiff lacked housing and had limited access to funds or communications due to Defendant Partner deactivating Plaintiff's phone, irregularities in federal docket suggested that the cases appeared to toggle between open and closed status.

58. Plaintiff's evidence and correspondence related to the federal litigation were located at the marital residence. The restraining order prevented Plaintiff from accessing these materials.

59. Due to threats, harassment, and retaliation associated with the federal litigation, Plaintiff was enrolled in the Safe-At-Home program.

60. One such threatening communication from representatives of McGaw Medical Center of Northwestern University stated in relevant part:

"I know that a big part of your character is seeking truth... but it will bite you in the ass if you don't learn to concede to the group... It is a dangerous world for a Black man..."

61. The communication contributed to Plaintiff's concerns regarding potential retaliation and safety risks related to the ongoing disputes and litigation, which formed part of the basis for Plaintiff's enrollment in the Safe-At-Home program.

62. Following a visit to the marital residence by members of Defendant Church [REDACTED], Defendant Partner informed Plaintiff that an external hard drive had been provided to her following the visit.

63. These individuals had previously appeared at the marital residence despite Plaintiff's Safe-At-Home protections and over Plaintiff's objections.

64. When Plaintiff asked why the hard drive had been provided, Defendant Partner did not provide a clear explanation.

65. Plaintiff reasonably believed that the device could contain information related to the ongoing disputes or litigation.

C. Denial of Court-Ordered Access to Property and Evidence

66. Plaintiff's records and documentation related to his federal litigation were stored at the marital residence.

67. A judge later issued an order permitting Plaintiff to enter the residence to retrieve personal belongings and materials relevant to ongoing legal proceedings.

68. Despite this order, Defendant Partner refused to permit Plaintiff entry.

69. On or about March 2, 2026, Plaintiff appeared at the residence accompanied by law enforcement pursuant to the court's order.

70. Defendant Partner again refused entry despite the order.

71. The responding agency documented the incident under Incident Report No. 260302-0004609 (West St. Paul Police Department).

72. During another attempt to retrieve property coordinated through the Dakota County Sheriff's Office, the Sheriff relayed that Defendant Partner had stated that "the items you are asking for are no longer at the house".

73. During an earlier civil assist with law enforcement on or about February 4, 2026, Plaintiff attempted to retrieve items related to the federal litigation.

74. During that civil assist, law enforcement received a report of an alleged restraining order violation, after which Plaintiff was arrested.

75. Plaintiff was not provided documentation regarding the specific basis for the arrest until after booking.

76. The circumstances surrounding that arrest are the subject of separate proceedings.

D. Deletion of Evidence and Interference with Communications

77. Prior to the arrest, Defendant Partner deleted electronic evidence related to the alleged defamatory statements on or about January 24, 2026.

78. Prior to the arrest, Defendant Partner had canceled a shared family cloud backup which effectively deleted all evidence stored pertinent to this claim and ongoing federal claims.

79. Defendant Partner also deactivated Plaintiff's phone service, which limited Plaintiff's ability to communicate and access information.

80. On or about January 30, 2026, Plaintiff communicated to Defendant Pastor and Defendant Church a proposal seeking an amicable resolution regarding anticipated defamation claims.

81. On the same date, Plaintiff filed a request for emergency temporary relief seeking access to personal property and modification of the order of protection.

82. That motion remained pending until the day of Plaintiff's arrest.

83. Plaintiff also sought relief in the pending divorce proceeding to address issues related to parental access and property.

84. A hearing was scheduled for March 2, 2026.

85. On the preceding workday, the hearing was stricken due to an alleged failure to provide summons, despite the county having issued the summons and failing to provide Plaintiff an affidavit confirming service.

E. Relationship to the Federal Litigation

86. The conduct described above occurred in the context of Plaintiff's ongoing federal litigation against his former employers.

87. In that litigation, Plaintiff alleged that **McGaw Medical Center of Northwestern University** falsely accused him of abusing a patient.

88. After investigation, those allegations were determined to be unfounded.

89. Despite the dismissal of those allegations, Plaintiff alleges that representatives of the institution continued disseminating those and other defamatory accusations to potential employers and licensing boards.

90. Plaintiff has also asserted claims under 42 USC § 1983, alleging interference with state agencies and actions taken under color of state law.

91. Plaintiff has further asserted claims including abuse of process and tortious interference related to prior family court proceedings.

92. According to Plaintiff's allegations in those proceedings, the interference resulted in Plaintiff being deprived of contact with his children for several years.

F. Public Documentation of Events

93. On October 28, 2025, Plaintiff publicly documented aspects of these events on a personal website.

94. Plaintiff wrote in part:

“There was no crime. No violence. No danger. My only ‘offense’ was speaking up...because of that I lost what no parent should ever lose – you.”

95. Around November 1, 2025, Plaintiff removed this content from Facebook and deactivated his account.

96. Defendant Partner, Defendant Pastor, and members of Defendant Church were aware of the post.

97. Defendant Partner knew that Plaintiff had deactivated his Facebook account and communicated this information to her sibling on or around Nov 11, 2025.

98. Around this time Defendant Partner began to receive text messages from unknown numbers requesting correspondence, to which she responded “Who is this?”

99. During the same general period, Plaintiff alleges that Defendants began circulating allegations of domestic violence within Defendant Church.

G. Financial Conduct Following the Restraining Order

100. Following the issuance of the restraining order, Defendant Partner appeared to have access to additional funds, including payments received through Cash App.

101. Defendant Partner prior to enactment of restraining order requested that Plaintiff return the CashApp card and tender it to a member of Defendant church.

102. After enactment of the restraining order, but before Defendant was served with divorce paperwork, Defendant Partner informed Plaintiff that she had sufficient funds to assist with hotel stays, household expenses, and vehicle payments.

103. After being served with divorce paperwork, on or around January 12, 2026, Defendant partner rescinded those statements.

104. Defendant Partner later made cash payments to repair a premarital vehicle but refused to continue payments, asserting insufficient funds.

105. The vehicle was subsequently repossessed during a period in which Plaintiff lacked housing. Plaintiff was unable to access or use the vehicle because Defendant Partner had taken the vehicle keys when she left the marital residence with the parties’ minor children on or about January 2, 2026, shortly before filing the restraining order. The restraining order further prevented Plaintiff from retrieving or accessing the vehicle or other personal property

106. Defendant Partner later purchased another vehicle, which she valued at approximately \$17,000 in the divorce proceedings. This amount substantially exceeded the payments that would have been required to prevent repossession of the premarital vehicle.


H. Pattern of Conduct

107. Taken together, the restraining order, withholding of property, deletion of electronic evidence, denial of access to the residence, and interference with communications occurred while Plaintiff was engaged in ongoing federal litigation.

108. Plaintiff alleges that these actions interfered with his ability to access evidence and preserve records relevant to those proceedings.

109. The conduct described above forms part of the basis for Plaintiff's claims including abuse of process, defamation, and spoliation of evidence.

I. Prior History Relevant to Knowledge, Intent, and Credibility

, has previously filed restraining orders in prior relationship. Plaintiff is informed and believes that at least two such restraining orders were filed and later dismissed.

111. During prior relationship disputes, Defendant partner made public accusations against former partners alleging rape and/or domestic violence.

112. Plaintiff possesses screenshots of Defendant Partner's social medial posts from prior periods that reflect similar accusations made during the course of relationship disputes.

113. Plaintiff previously filed a police report alleging domestic violence committed by Defendant Partner against him.

114. In the weeks preceding the allegations that gave rise to the present dispute, Defendant Partner physically struck Plaintiff during an argument. Defendant Partner later acknowledged the incident in a text message.

115. Plaintiff also possesses screenshots of social media posts made by Defendant Partner that provide context regarding her statements, conduct, and public communications during the period surrounding the parties' relationship and dispute.

116. These posts include statements attributed to Defendant Partner on Facebook including the following:

“What's better than hearing ‘I Love you?’
Me the krrrr sound the ATM makes when I'm withdrawing my money.”

117. In another Facebook post, Defendant Partner wrote:

“Cash me at church. How bout dat!”

118. In a separate post, Defendant Partner wrote:

“If you like her put \$500 in her account every morning – Psalms 116:3”

119. In another post, Defendant Partner wrote:

“I wish I didn't have bills and stayed at home with my Moma so I could ball like some of yal.”

120. Plaintiff includes these posts as examples of Defendant Partner's public statements during the relevant period, which may be relevant to issues of credibility, motive, and context in the disputes between the parties.

121. The social media posts referenced above were published on accounts publicly associated with Defendant Partner, including accounts using her name, profile photographs, and other identifying information known to Plaintiff and members of Defendant Church.

122. Plaintiff personally observed the posts while they were publicly accessible and preserved copies of the posts through screenshots and electronic capture methods.

123. The screenshots include visible account identifiers, timestamps, and other contextual information associated with Defendant Partner's social medial profile.

124. Plaintiff reasonably believes that the referenced posts were authored, published, or approved by Defendant Partner.

125. Plaintiff further reasonably believes that additional relevant posts, messages, and related electronic communications exist or existed on Defendant Partner's social media accounts and devices.

126. Because litigation was reasonably foreseeable at the time these posts were made, such electronic materials were subject to duty to preserve evidence.

127. On or about Feb 24, 2026, Defendant Partner communicated to a family member concerns regarding Plaintiff's potential legal actions, including the filing of complaints or motions in ongoing litigation. The communication expressed that such actions could have consequences to Plaintiff's access to the marital children. Plaintiff does not allege the truth or falsity of any statements made to the family member but includes the communication to show the Defendant's awareness of the Plaintiff's legal activities and the connection between those activities and parental access concerns.

J. Background and Pattern of Coordination with Third Parties (April 2025 – December 2025)

128. In or about April 2025, Defendant Partner began coordinating with third parties in a manner that involved monitoring Plaintiff's whereabouts, activities, and interactions, including communications with members of Defendant Church and other associates.

129. During this period, Defendant Partner invited individuals into the martial residence over Plaintiff's objections. Those individuals inquired about Plaintiff's location and activities. Some of

130. Plaintiff raised safety concerns regarding third-party access to the residence and filed police reports concerning home entry without theft. Upon learning that Defendant Partner had invited certain individuals into the residence without consent, Plaintiff amended the reports to reflect the unpermitted entry.

131. Plaintiff was at the time a participant in the Safe-at-Home program, due to ongoing federal litigation against his former employers, and had expressly objected to third parties being provided information regarding his whereabouts or entering the residence without consent.

132. Defendant Partner nevertheless communicated Plaintiff's whereabouts to third parties and facilitated access to the residence despite Plaintiff's objections and his Safe-at-Home protections, demonstrating a disregard for his personal safety, privacy, and legal protections.

133. These communications and invitations included coordination with members of Defendant Church, including Defendant Pastor, who were aware of Plaintiff's Safe-at-Home enrollment and the pending federal litigation. Defendant Partner's coordination with church members and other third parties created a network of information sharing that affected Plaintiff's safety, privacy, and ability to maintain contact with his children.

134. Defendant Partner's actions during this period reflect a pattern of manipulation and coordination with others for extraneous personal purposes, including interpersonal relationships outside the marriage, influence within the church, and management of Plaintiff's access to his home and children. This conduct foreshadowed later actions in orchestrating restraining orders, defaming Plaintiff, and interfering with Plaintiff's parenting and communications.

135. Plaintiff observed that Defendant Partner monitored and deleted communications related to Plaintiff's prior interactions, social media activity, and personal accounts, including messages relevant to the federal litigation and parenting arrangements, further restricting Plaintiff's access to critical evidence and information.

K. False Domestic Violence Allegations and Publication

136.. On or around Nov 6, 2025, Plaintiff and Defendant Partner received an eviction notice for their marital residence located in Washington County, MN.

137. On Nov 10, 2025, Defendant Partner communicates to the Plaintiff via text message:

“ I want you to know I trust you. I want you to know you can tap me in though if we need it. We are a team. Love you. Us Vs the World”.

138. On or around Nov 17, 2025, Def. Partner, having applied for jobs but not yet secured employment, stated via text message:

“I would like a timeframe to which I'd be able to stop working” and “I am serious when I say I want a timeline for me to not have to work...that needs to be part of your business plan”.

139. Defendant Church, through its leadership, assisted Defendant Partner in securing employment. By contrast, Defendant Pastor deliberately refused to assist Plaintiff in obtaining employment, despite Plaintiff's repeated requests and his prior communications seeking support.

140. Upon information and belief, beginning in November 2025, Defendant Partner communicated to members of Defendant Church, including Defendant Pastor, allegations of domestic violence by Plaintiff.

141. Defendant Partner invited members of Defendant Church to the marital residence from November through December 2025, despite Plaintiff's objections and his Safe-At-Home protections.

142. Plaintiff explicitly stated that he did not want church members coming to the home or being informed of his location. Defendant Partner disregarded these objections, providing access and information in contradiction to the Safe-at-Home protections and Plaintiff's expressed concerns.

143. Upon information and belief, Defendant Partner began posting indirect allegations of domestic violence on social media around November 2025. These posts, in addition to church communications, contributed to a narrative of domestic violence and public perception that negatively affected Plaintiff's reputation and credibility.


144. Defendant Partner also communicated to the two eldest children, aged 3 and 5, a narrative of domestic violence in December 2025, which continued after the issuance of the restraining order. The communications affected the children's perception of Plaintiff and altered the youngest child's disposition.

145. Following the enactment of the restraining order on or about January 5, 2026, one or more of the federal complaints in which Plaintiff was involved—each of which had been active and open prior to the restraining order—were marked with dismissal dates around the time the eviction notice was received in early November 2025. These developments in the federal litigation coincided with and contextualize Defendant Partner's subsequent conduct, including communications to third parties and public postings regarding domestic violence.

L. Restraining Order Filing and Coordination

146. On or around Jan 1, 2026, the Plaintiff discovers the following on Def. Partner's phone and computer:

(a) Cash app payments made to Defendant Partner that Plaintiff did not recognize.

 photos of Defendant Partner sent via invisible ink to individuals and via Direct Message.

(c) Direct Message and Text Messages between Defendant Partner and Members of Defendant Church, who had come to the marital home, falsely alleging Domestic Violence.

(d) Text Messages between Defendant Partner and Members of Defendant Church, where Defendant Partner is communicating Plaintiff's whereabouts and when Plaintiff would not be home.

(e) Text messages between Defendant Partner and regarding Defendant Partner sharing SNAP benefits with Members of Defendant Church.

(f) Text messages between Defendant Partner and Member of Defendant Church stating that Defendant Plaintiff was "disposable" and that now Defendant Partner has a "village" with Defendant Church.

(g) Defendant Partner laughing and joking with Member of Defendant Church regarding threat of divorce:

Defendant Partner: That Part!! I told him he not gonna make me feel guilty. If anything, they should be taken as a wake up call.

Defendant Church Member: Right...cause you told him not like it was a surprise

Defendant Partner: EXACTLUY there's nothing there I didn't tell you lol. I was crystal clear, maybe he didn't realize I filled out all 40 pages What a drag Lbvs. I HATE Paperwork "SKULL" symbol.

Defendant Church Member: Right that was a lot for it to be 40 pages whew. But come on now dude. What changed that you came to the store.

Defendant Partner: He didn't argue though, didn't raise his voice. Good question. He said it would probably be a good decompression after work. But that was after he said he needed a break. He was gonna go to the library but realized it would't be worth going. Plus I told him he my prefer to go tomorrow

Defendant Church Member: Awww ok.

Defendant Partner: I hate the weirdness of the calm. I thought he was gonna be pissed when I walked in on him reading through...both of them "SKULL" symbol.

Defendant Church Member: Idk sis lol

Defendant Partner: I love youuu! Lolol

Defendant Church Member: I love you more lol

147. Plaintiff video recorded the encounter that took place immediately following the events described in paragraph 146.

148. Defendant Partner then called the Police and alleged domestic violence.

149. Several officers arrived at the marital home.

150. The Plaintiff shows the officers the video footage and no arrest is made.

151. One of the officers states that, although no domestic violence occurred, Defendant Partner could take the children and relocate to a different location.

152. Defendant Partner took the marital children and left the house, proceeding to an undisclosed location, where they remained for several days – until the children were returned to Plaintiff during a church service on January 4, 2025.

153. Upon information and belief, sometime after Defendant Partner departed the marital home with the children, she requested an Order of Protection against the Plaintiff.

154. On January 4, following a church service, Defendant Partner returned to the marital home with the marital children while the Plaintiff was present – once to return the children, another time briefly to shower, and at least one additional occasion for another purpose – each time departing again to an undisclosed location while the children remained with Plaintiff.

155. In January of 2026, after enactment of order of protection, Defendant Partner began communicating a narrative of domestic violence to the children's daycare teachers.

156. On or around January 12, 2026 Defendant Partner communicated that she anticipated lifting the Order of Protection.

157. On or around January 13, 2026 Defendant Partner communicated to the Plaintiff that she had requested to lift the Order of Protection and that she was awaiting a call to confirm whether it was approved.

158. On or about January 23, 2026, Plaintiff observed several social media posts by Defendant Partner reflecting her attitude toward money, relationships, and lifestyle, which provide context for credibility and character in the ongoing dispute. These included:

A. Facebook Post #1: “Him; What's better than hearing I love you? ME: the krrrrr sound the ATM makes when I'm withdrawing my money.”

B. Facebook Post #2: “Cash me at church How bout dat!”

C. Facebook Post #3: “If you like her put \$500 in her account every morning — Psalms 116:3.”

D. Facebook Post #4: “I wish I didn't have bills and stayed at home with my Moma so I could ball like some of yal.”

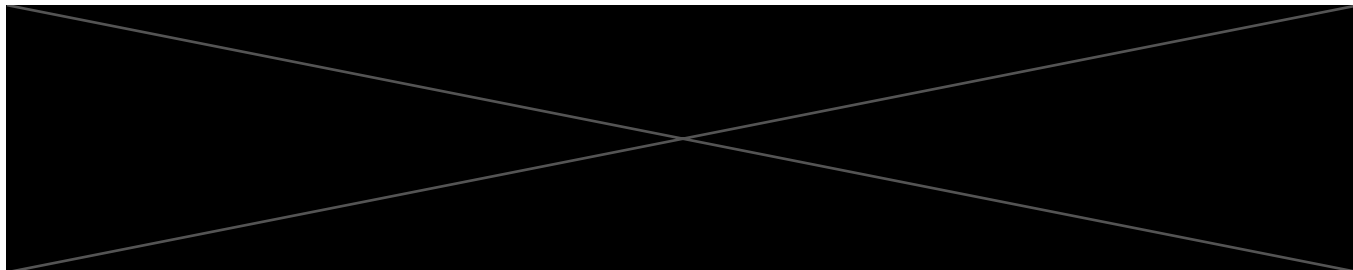
159. Around the same time as the above social media posts, Plaintiff received correspondence from the Office of the Clerk that at least one federal complaint in ongoing litigation with former employers, including McGaw Medical Center of Northwestern University, Health Partners, and Wood Health Company, was dismissed. Each of these cases had been active and open immediately prior to the restraining order and eviction notice, and the dismissal coincided approximately with the timeframe of the eviction notice received on or about Nov 6, 2025. This timing reflects the intersection of federal litigation, Plaintiff's residential instability, and Defendant Partner's coordination with third parties.

160. Plaintiff was enrolled in the Safe-At-Home program at the time and had objected to Defendant Partner communicating his whereabouts or permitting third-party access to the marital home. Defendant Partner's actions—including facilitating access and disseminating information to third parties—demonstrate disregard for Plaintiff's safety and the protections afforded under Safe-

At-Home, particularly during a period when critical federal evidence and correspondence were stored at the marital residence.

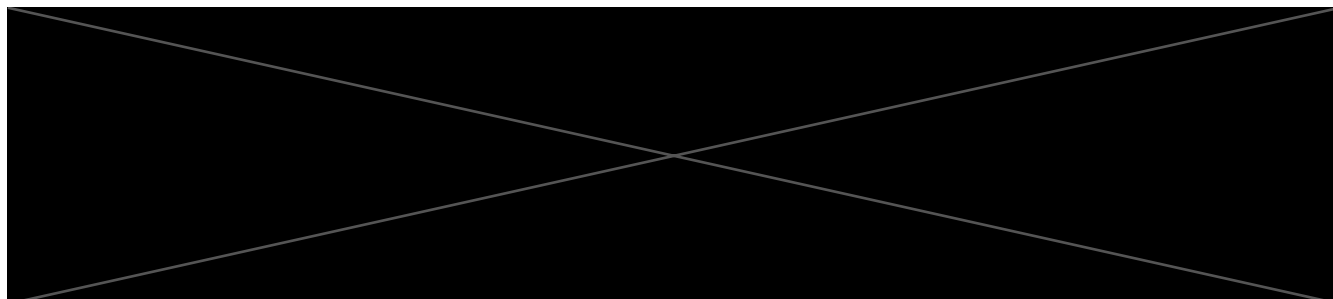
M. Social Media Publication and Republication

161. On or about January 23 of 2026, Defendant Partner falsely alleged on Facebook that Plaintiff committed domestic violence, stating the following:



162. Upon information and belief, around the same time, Defendant Partner posted on Facebook in support of Defendant Pastor, stating “That’s my Pastor”.

163. On or around January 23, 2026. Defendant sister then posted on her Facebook and tagged the Plaintiff in the following:



164. The allegations were false and unsupported by police findings, or judicial determination.

165. The statements in paragraphs 161 and 163 constitute accusations of criminal conduct.

166. Collectively, Defendant Partner and Defendant’s Sister’s comments were disseminated to well over 5000 contacts with several mutual contacts.


167. On or around January 24, 2026, Defendant Partner deleted one or more Facebook accounts of which Defendant was aware.

166. On or around January 24, 2026, Defendant Partner canceled his cell phone service from our family plan, effectively leaving Plaintiff with no means to communicate with marital children, housing needs, bills, or other needs.

167. On or around January 24, 2026, Defendant Partner cancelled Plaintiff’s cloud storage, effectively deleting stored text message communications with the Plaintiff.

N. Increased Church Involvement and Coordination

168. In or around Nov of 2025, the Church and its agents, including the Pastor, facilitated Defendant Partner's employment, including assisting her in obtaining employment, including



169. Around this same time, Defendant Pastor appointed Defendant Partner to the church praise team.

170. Defendant Partner remained at church after rehearsals, coinciding with Defendant Pastor's presence.

171. During a meeting between the Pastor and the Plaintiff in or around December of 2025, the Pastor inquired of the Plaintiff regarding Defendant's experience at her new job, but refused to assist Plaintiff in obtaining employment.

172. In or around December of 2025, Defendant Partner was promoted by Defendant Pastor to **center-stage praise team** on Sunday services.

173. Defendant Partner remained at church after rehearsals, coinciding with Defendant Pastor's presence.

174. Defendant Partner confirmed she was **receiving advice directly from Defendant Pastor** regarding how to proceed with the restraining order.

175. Upon information and belief, Defendant Pastor also provided financial support to Defendant Partner prior to and after restraining order, and even after Partner had gainful employment.

176. This increased presence and promotion placed Defendant Partner in close contact with church leadership, facilitating coordination regarding the false allegations and restraining order process.

177. These facts support claim of bias, improper influence, and coordinated conduct between Defendant Partner and Defendant Pastor.

178. The aforementioned conduct reflects ongoing coordination and preferential treatment toward Defendant spouse, consistent with a pattern of behavior supporting Plaintiff's claims of conspiracy, aiding and abetting, and interference with Plaintiff's parental and personal rights.

O. Financial Entanglement and Bias



181. Defendant Pastor continued to provide financial support to Defendant Partner.

182. As a result, Plaintiff no longer had access to housing support or subsistence benefits and became homeless.

183. These interactions created bias, incentive, and lack of neutrality.

P. Pastor's Selective "Jurisdiction" and Abandonment

184. Plaintiff is a member of Christ Temple Apostolic Church.

185. In a final conversation, Defendant Pastor asked Plaintiff whether he knew who his wife was dating.

186. Defendant Pastor stated that if Defendant Partner was dating someone outside the church, he had "no jurisdiction."

187. Defendant Pastor stated that if she was dating someone within the church, he would want to meet with them (Defendant wife and the new partner that she would be dating).

188. Defendant Pastor had previously refused to meet jointly with Plaintiff and Defendant Partner while they were married.

189. After Plaintiff became homeless, Defendant Pastor refused assistance and ceased contact.

190. However, Defendant Pastor continued support to Defendant Partner after Plaintiff became homeless from restraining order.

Q. Communication to Church and Intentional Infliction of Emotional Distress

191. Defendant Partner communicated false allegations to Defendant Pastor and church members.

192. Defendant Pastor treated the allegations as credible without verification.

193. During a church service on Sunday, January 4, 2026, Plaintiff's children were removed from him without a court order or emergency.

194. Specifically, at the end of service, but prior to everyone being dismissed, church members removed my eldest and youngest daughter away from the Plaintiff without Plaintiff's consent or permission and when there was no emergency.

195. The Plaintiff's 3-year-old son, who was holding onto Plaintiff at the time his siblings were removed, was then physically separated from Plaintiff by a church member.

196. The child was visibly distressed and resisted the separation, including kicking and crying.

197. The incident was observed by multiple members of the congregation.

198 Plaintiff did not physically resist or interfere with the removal of his three children.

199. The separation occurred in the absence of any emergency circumstances or court order authorizing removal of the child from Plaintiff's care.

200. Immediately after this several members began to questioned Plaintiff regarding what he had "done" to his wife and why his wife was in "hiding".

201. Plaintiff was publicly humiliated and treated as an abuser.

202. Immediately following the January 4, 2026 church service incident, Defendant Partner asked the Plaintiff whether the children could accompany Plaintiff back to the marital residence.

203. Defendant Partner later returned to the residence with the children, remained briefly to shower, and then departed to an undisclosed location.

204. On January 5, 2026, while Plaintiff was caring for the children at the residence, Plaintiff was served with notice of restraining order.

205. Upon being served with the Order of Protection, Plaintiff was separated from the marital children. The separation included very young children – the youngest being only 5 months old at the time (now 7 months old), a 3-year old, and a 5-year old – whom Plaintiff had been involved with every single day of their lives. This separation occurred during their formative developmental years, creating harm that cannot be regained, particularly with the youngest child, and caused severe emotional distress to Plaintiff and the marital children.

206. The conduct described above was extreme and outrageous, intentionally directed at Plaintiff, and beyond all possible bounds of decency. Defendants' actions – publicly humiliating Plaintiff, falsely portraying him as an abuser, forcibly removing his young children without consent or legal authority, and causing prolonged separation from his children during their formative years – were intended to, and did in fact, cause severe emotional distress to Plaintiff. The extreme and outrageous nature of these actions, coupled with the intentional and reckless disregard for Plaintiff's emotional well-being, constitutes intentional infliction of emotional distress under Minnesota law.

R. Abuse of Restraining Order Process

207. Plaintiff further alleges that Defendant Partner consulted with and received guidance from the Defendant Church and its agents, including Defendant Pastor, regarding allegations of abuse and pursuit of legal remedies.

208. Upon information and belief, Defendant Church and its agents, including Defendant Pastor, discussed with Defendant Partner the option of seeking a restraining order, the timing of filing, and strategies for presenting the allegations to law enforcement and the court.

209. While the restraining order was filed by Defendant Partner, Plaintiff alleges that the guidance and involvement of Defendant Church and its agents, including Defendant Pastor, are relevant to

the surrounding circumstances and bear on the intent, purpose, and coordination of the actions taken.

210. Plaintiff does not presently name Pastor as a Defendant in the abuse of process claim but reserves the right to amend the pleadings if discovery establishes direct participation sufficient to support such a claim.

211. On the same day that Defendant Partner reported allegations of domestic violence to law enforcement, Plaintiff created a contemporaneous video recording of the interaction that was subsequently cited in connection with the Order of Protection petition.

212. Law enforcement reviewed the recording and made no arrest.

213. No evidentiary hearing regarding any allegation of domestic violence had occurred at any point in time preceding the initiating of the actions herein.

214. After enactment of the Order of Protection, Defendant Partner attempted to remove the Order of Protection.

215. Defendant Partner communicated to the Plaintiff that she was unsuccessful in removing the Order of Protection.

216. Despite no adjudication, the restraining order was treated by Defendant Partner, Defendant Church, and others as proof of abuse.

217. Plaintiff further alleges that the actions of Defendant Partner, and the guidance and involvement of Defendant Church and its agents, including Defendant Pastor, in pursuing the restraining order were not motivated by any legitimate concern for Plaintiff's safety, but instead served extraneous personal interests, including:

- A. Interference with Plaintiff's parenting time and access to the marital children.
- B. Deprivation of Plaintiff's lawful access to marital property, financial resources, and personal belongings, including evidence relevant to ongoing federal litigation.
- C. Efforts to damage Plaintiff's reputation and credibility, including dissemination of false narratives within the Church and via social media.
- D. Support for Defendant Partner's extramarital personal interests and coordination with third parties to control access to Plaintiff.

218. These coordinated actions demonstrate a pattern of bias and manipulation intended to deprive Plaintiff of his legal and parental rights while protecting Defendant Partner's personal and financial interests.

S. Harassment and Provocation

219. In or around November of 2026, after beginning her new employment, Defendant Partner began to incite and instigate arguments with Plaintiff.

220. During these confrontations, Defendant Partner would verbally insult Plaintiff and, at times, physically strike him in an effort to provoke a response or create grounds for false allegations.

221. Historically, Defendant Partner engaged in similar conduct whenever Plaintiff discovered messages on her phone or Direct Messages and inquired about their content.

222. Defendant Partner would respond either by escalating the situation, physically attacking Plaintiff, or creating diversions intended to silence or defer his inquiries.

223. A prior incident, involved Plaintiff questioning Defendant Partner's decision to move in with a female work associate. In response, Defendant Partner attacked Plaintiff and destroyed his property. Plaintiff reported this incident to the police and Defendant Partner was removed from the property.

224. In the weeks immediately preceding the filing of the restraining order in the case herein, Defendant Partner repeatedly verbally harassed and struck Plaintiff.

225. These actions were intentional, repeated, and directed at Plaintiff without his consent, and they caused substantial emotional distress, fear, and disruption, constituting harassment and provocation under Minnesota law.

T. Loss of Housing and Safe at Home Interference

226. Upon service of the restraining order, Plaintiff was forced to leave his residence and became homeless.

227. As a result, Plaintiff lost access to Safe-at-Home protections, housing stability, contact with his children, and enrollment in his educational training program at Summit.

228. Defendant Partner's conduct also included deliberate interference with Plaintiff's safe at home protections, not for any legitimate safety purposes, but rather for personal or extraneous interests, including:

- A. Harassment and retaliation against Plaintiff.
- B. Exclusion of Plaintiff from access to marital property and personal belongings, including evidence relevant to ongoing federal litigation.
- C. Impeding Plaintiff's lawful parenting time and interactions with his children.
- D. Facilitating third-party access to the residence and coordination with extramarital associates and church members to further Defendant Partner's personal agenda.

229. This interference with Safe-at-Home protections, combined with the restraining order and church coordination, evidences Defendant Partner's malicious intent, reckless disregard for Plaintiff's rights, and systematic effort to disadvantage Plaintiff in legal, parental, and personal contexts.

230. Taken together, these facts demonstrate a sustained pattern of harassment, provocation, and extraneous conduct by Defendant Partner, supported and coordinated by Defendant Church and

Defendant Pastor, aimed at controlling, humiliating, and isolating Plaintiff, while shielding Defendant Partner from accountability.

U. Spoilation of Evidence

231. Defendant Partner was served with divorce papers on or around Jan 12, 2026, placing her on notice of impending legal proceedings.

232. Plaintiff further alleges that, with knowledge of anticipated litigation, Defendant Partner intentionally destroyed, concealed, or restricted access to evidence relevant to Plaintiff's claims.

233. After Plaintiff became aware of social media postings and other communications, Defendant Partner deactivated shared electronic accounts, including a shared cloud storage account, and restricted Plaintiff's access to certain digital communications.

234. Defendant Partner also deactivated Plaintiff's phone service, depriving him of meaningful contact with his marital children, access to evidence, and the ability to manage household affairs or address legal matters.

235. Following deletion of the cloud storage and elimination of text messages, Defendant partner asked Plaintiff whether the deletions were effective and whether he retained access to prior messages, demonstrating intent to monitor and control Plaintiff's access to evidence.

236. On or around January 24, 2026, Defendant Partner deleted one or more personal Facebook accounts containing:

- A. Defamatory posts regarding Plaintiff,
- B. Evidence of false domestic violence allegations, and
- C. Historical posts reflecting prior domestic violence or sexual misconduct accusations in prior relationships.

237. Defendant Partner, with knowledge of anticipated litigation, intentionally destroyed or concealed evidence.

238. As a result, electronic data, messages, and materials relevant to the allegations described herein were deleted or rendered inaccessible.

239. These actions occurred after Defendant Partner had been placed on notice of potential litigation and prior to Plaintiff's ability to preserve relevant records.

240. Upon information and belief, certain deleted communications included interactions involving Defendant Pastor and/or church members.

241. Plaintiff further alleges that the timing, scope, and nature of these deletions may reflect coordination, advice, or influence from third parties, including Defendant Church and its agents. Plaintiff does not presently assert a separate spoliation claim against Defendant Church or

Defendant Pastor but reserves the right to amend the pleadings should discovery establish direct participation.

242. These acts were intentional, malicious, and designed to deprive Plaintiff of evidence, causing substantial prejudice to his ability to litigate claims, access parenting information, and preserve critical documentation relevant to federal, state, and family proceedings.

V. Additional Spoilation, Harassment, Stalking and Invasion of Privacy.

243. Beginning in or about April 2025 and continuing through December of 2025, Defendant Partner engaged in repeated conduct involving disclosure of Plaintiff's whereabouts and activities to third parties despite Plaintiff's express objections and participation in the Safe-At-Home program.

244. Plaintiff repeatedly informed Defendant Partner that he did not consent to third parties being provided information regarding his location, schedule, or residence. Notwithstanding these objections, Defendant Partner communicated Plaintiff's whereabouts to members of Defendant Church and other individuals.

245. Defendant Partner also invited third parties into the marital residence over Plaintiff's objections, including during periods when Plaintiff had raised safety concerns or was actively enrolled in the Safe-at-Home program.

246. On multiple occasions, individuals who received information from Defendant Partner inquired about Plaintiff's location, activities, and personal affairs.

247. Following the filing of the restraining order, Defendant Partner deactivated Plaintiff's phone and shared electronic accounts, further limiting Plaintiff's ability to communicate, access personal data, and preserve evidence.

248. Plaintiff alleges that the foregoing conduct occurred repeatedly and was intentionally directed toward monitoring, disclosing, or interfering with Plaintiff's location, communications, and private affairs without consent.

249. As a result of these actions, Plaintiff experienced interference with his privacy, disruption of his residence, exclusion from parental responsibilities, and substantial emotional distress associated with repeated disclosures of his location and activities.

250. Plaintiff further alleges that Defendant Partner possessed, and actively used, Plaintiff's passwords and PINs for multiple Facebook profiles.

251. Defendant Partner had access to Plaintiff's Facebook Direct Messages, which contained pertinent context regarding their marriage, parenting interactions, and communications relevant to ongoing federal litigation.

252. Plaintiff observed that prior posts and messages providing context and documentation of their relationship, parenting, and household interactions were deleted or otherwise rendered inaccessible.

253. Plaintiff observed activity consistent with a third party restoring and deleting prior and current Facebook Direct messages in the Plaintiff's Facebook account.

254. Plaintiff observed activity consistent with a third party restoring, deleting, or otherwise manipulating Facebook Direct Messages in Plaintiff's accounts.

255. Plaintiff received multiple notifications from Facebook of dual logins into his accounts.

256. Plaintiff also noticed notifications indicating that messages had been received, but upon attempting to access them, the messages were deleted or no longer available.

257. The foregoing conduct reflects repeated, non-consensual, and deliberate actions directed at Plaintiff with the intent to monitor, control, or interfere with his private affairs and communications

258. These actions constitute harassment, stalking, and invasion of privacy under Minnesota law, and further demonstrate a coordinated pattern of behavior by Defendant Partner that:

- A. Interfered with Plaintiff's ability to preserve evidence relevant to federal and state litigation,
- B. Obstructed Plaintiff's lawful access to marital children and property, and
- C. Contributed to Plaintiff's loss of housing, Safe-at-Home protections, and meaningful participation in his children's care.

259. Collectively, the repeated deletions, disclosures, and manipulations of digital communications, combined with physical interference and coordination with third parties, demonstrate intentional spoliation of evidence, harassment, and violations of Plaintiff's privacy rights.

IV. CAUSES OF ACTION

COUNT I – Defamation Per Se (Libel and Slander) (Against Defendant Partner and Defendant Sister)

[Minnesota law: Minn. Stat Stat. § 544.33; common law defamation per se]

260. Plaintiff incorporates all preceding paragraphs as if fully set forth herein.

261. Defendants knowingly published false statements concerning Plaintiff, including, but not limited to, statements that Plaintiff committed domestic violence and other criminal acts.

262. The statements were communicated to third parties, including family members, church members, law enforcement personnel, and social media audiences.

263. These posts were disseminated widely, including to a social media audience exceeding 5,000 people.

264. The statements were further amplified by church members and other third parties, increasing their reach and impact.

265. These statements are defamatory per se under Minnesota common law because they:

- (A) Impute the commission of a criminal offense;
- (B) Imply the Plaintiff has engaged in conduct involving moral turpitude; and
- (C) Imply conduct incompatible with Plaintiff's professional and social standing.

267. As a direct and proximate result of Defendants' conduct, Plaintiff has suffered and continues to suffer harm, including injury to reputation, emotional distress, and other damages, the full extent of which will be proven at trial.

COUNT II – Republication and Joint Liability (Against All Defendants)

268. Plaintiff incorporates all preceding paragraphs as if fully set forth herein.

269. After Defendant Partner published the defamatory statements described in Count I, Defendant Sister republished, forwarded, or otherwise communicated those statements to third parties, including family members, church members, and social media audiences

270. Defendant Partner knew or reasonably anticipated that Defendant Sister, the Church, and its agents, including Defendant Pastor, would republish or amplify the defamatory statements

271. Upon information and belief, the Church and its agents, including Defendant Pastor, intentionally repeated or communicated the defamatory statements to members of the congregation and other third parties, knowing or reasonably expecting that the statements were false.

272. By republishing, amplifying, or otherwise disseminating the defamatory statements originally made by Defendant Partner, each Defendant assumed liability for the harm caused by the republication.

273. As a direct and proximate result of Defendants' republication and dissemination of the statements described in Count I, Plaintiff suffered harm to his reputation, emotional distress, and other damages.

274. Defendants acted independently and in concert to republish or adopt as true the defamatory statements, and are jointly and severally liable for the harm caused.

COUNT III – Civil Conspiracy/Aiding and Abetting (Against All Defendants)

275. Plaintiff incorporates all preceding paragraphs as if fully set forth herein.

276. Defendants agreed or acted in concert to commit the wrongful acts alleged in Counts I and II.

277. Defendants coordinated or facilitated defamation, interference with parenting, spoliation of evidence, and harassment.

278. Defendants acted in concert to amplify false allegations, obstruct Plaintiff's access to property and evidence, and interfere with his parental and personal rights, intending to cause harm.

279. Each Defendant knew of the wrongful acts and substantially assisted, encouraged, or directed them.

280. Defendant Church and its agents, including Defendant Pastor, encouraged or assisted Defendant Partner in filing the restraining order and in other actions intended to interfere with Plaintiff's rights.

281. Defendant Church and its agents, including Defendant Pastor, also amplified false statements regarding alleged domestic abuse, communicated those statements to third parties, and coordinated with Defendant Partner to further these efforts.

282. Defendants' actions were intentional, coordinated, and carried out with knowledge that they would interfere with Plaintiff's legal, parental, and personal rights.

283. As a direct and proximate result of Defendants' coordinated actions, Plaintiff suffered harm, including damage to his reputation, emotional distress, loss of housing, interference with parenting, and other damages.

COUNT IV. – Intentional Infliction of Emotional Distress (Against All Defendants)

284. Plaintiff incorporates all preceding paragraphs as if fully set forth herein.

285. Defendants engaged in repeated false allegations of abuse, coordinated removal of Plaintiff's children during church service, interference with Plaintiff's Safe-at-Home protections, and deletion of electronic evidence. These actions were deliberately designed to harm Plaintiff emotionally and disrupt his family life.

286. Conduct was repeated, non-consensual, and directed at Plaintiff, causing substantial disruption and emotional harm.

287. Defendants' conduct including repeated false statements, harassment, defamation, misuse of legal process (including the false restraining order), public removal of Plaintiff's children from his care during a church service without any legal authority or emergency circumstances, and

subsequent separation from his children, was intentional, reckless, and extreme. This conduct was designed to provoke distress, public humiliation, and damage Plaintiff's reputation and family relationships.

288. Specifically, the false allegations of abuse, the public humiliation of Plaintiff at the church service on January 4, 2026, where his children were forcibly removed from his care in front of the congregation, and the subsequent public questioning and defamation by church members caused Plaintiff to be treated as an abuser. These actions were extreme and outrageous and had a profound impact on Plaintiff's emotional well-being.

289. The actions taken by Defendants resulted in severe emotional distress for Plaintiff, including homelessness, humiliation, disruption of family and personal life, the painful separation from his children, and the inability to repair the emotional damage done to his very young children, especially during their formative developmental years. The youngest child, who was only 5 months at the time of separation, continues to experience the effects of this prolonged separation.

290. Plaintiff further alleges that these actions, particularly interference with parenting time and separation from his children without any legal basis, were intentionally inflicted with reckless disregard for Plaintiff's emotional well-being and were aimed at causing emotional harm and distress.

291. Plaintiff is entitled to compensatory damages for emotional harm, including but not limited to damages for pain and suffering, loss of parenting time, and harm to family relationships, as a direct result of Defendants' conduct.

**COUNT V. Abuse of Process/Malicious Prosecution
(Against Partner)**

292. Plaintiff incorporates all preceding paragraphs as if fully set forth herein.

293. Defendant Partner intentionally used legal processes, including police reports and protective orders, for an improper purpose unrelated to any legitimate safety concern.

294. Specifically, Defendant Partner filed a restraining order against Plaintiff without sufficient evidence of abuse or any reasonable basis to believe that Plaintiff posed a threat.

295. The restraining order was filed without probable cause and for an ulterior motive, namely to interfere with Plaintiff's parenting time, access to marital property, reputation, and other personal interests, rather than to protect against actual domestic violence.

296. Prior to filing of the restraining order, the Defendant Partner received guidance and encouragement from the Pastor and agents of the Church regarding the filing, including coordination with third parties, statements, and other conduct that contributed to the misuse of legal process for personal objectives.

297. As a direct and proximate result of Defendant's improper use of the restraining order process, Plaintiff suffered significant harm, including but not limited to loss of housing, deprivation of

parenting time, separation from his very young children for over two months, a deprivation that continues to this day. At the time of separation, the youngest child was only five months old, and is now seven months old. These actions caused Plaintiff severe emotional distress.

298. Plaintiff reserves the right to amend this Count to include the Pastor and Church as Defendants upon discovery of additional evidence establishing their direct participation in the abuse of process.

299. Defendant Partner's actions constitute abuse of process and malicious use of legal procedures.

300. As a direct and proximate result of Defendant Partner's conduct, Plaintiff has sustained damages, including, but not limited to, emotional distress, harm to familial relationships, reputational harm, and other consequential damages.

**COUNT VI – Stalking/ Invasion of privacy
(Against Partner)**

301. Plaintiff incorporates all preceding paragraphs as if fully set forth herein.

302. Defendants engaged in repeated, unwanted conduct directed at Plaintiff, including harassment, surveillance, and communication intended to intimidate, control, and invade Plaintiff's privacy.

303. Beginning in or about April 2025 and continuing through December 2025, Defendant Partner repeatedly disclosed Plaintiff's whereabouts, schedule, and personal activities to third parties despite Plaintiff's express objections and participation in the Safe-At-Home program, which prohibits such disclosures.

304. Plaintiff expressly informed Defendant Partner that he did not consent to third parties being provided information regarding his location, schedule, or residence. Notwithstanding those objections, Defendant communicated Plaintiff's whereabouts to members of the church and to the other individuals, including during periods when Plaintiff had raised safety concerns.

305. Defendant Partner invited third parties into the marital residence over Plaintiff's objections, including during periods when Plaintiff had explicitly raised concerns about safety and privacy.

306. On multiple occasions, individuals inquired about Plaintiff's location and activities after receiving information from Defendant Partner, further violating his privacy.

307. Following the filing of the restraining order, Defendant Partner took additional steps to control and restrict Plaintiff's access to communication and personal data, including deactivating Plaintiff's phone access and sharing electronic accounts, effectively limiting Plaintiff's ability to communicate and access his own private information.

308. Defendant Partner also gained access to Plaintiff's Facebook profiles, including passwords and PINS, and monitored his private communications without consent,

309. Plaintiff observed activity consistent with a third party (Defendant) restoring and deleting prior and current Facebook Direct messages from his Facebook account.

310. Plaintiff received multiple notifications from Facebook indicating dual logins into his account and access from locations other than his own, further indicating unauthorized access to his private information.

311. Plaintiff also noticed several notifications indicating that Facebook Direct Messages had been received, but upon accessing them, the messages were listed as deleted or no longer available, evidencing non-consensual interference with his communications.

312. The foregoing conduct constitutes repeated, non-consensual actions directed at Plaintiff, including harassment, surveillance, and invasion of his private affairs, which fall within the scope of stalking and invasion of privacy under Minn. Stat. § 609.749.

313. As a result of Defendant's conduct, Plaintiff has suffered emotional distress, fear for personal safety, disruption of his home life, and interference with his personal communications and privacy.

COUNT VII – Civil Harassment (Minn. Stat. Section 609.748)
(Against Partner)
[Citation: Minn. Stat. §609.748]

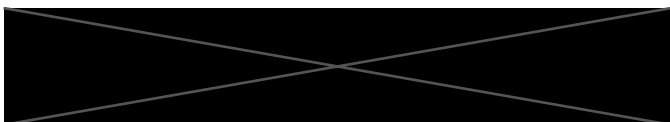
314. Plaintiff incorporates all preceding paragraphs as if fully set forth herein.

315. Defendants engaged in repeated conduct intended to harass, threaten, or alarm Plaintiff, including false statements to third parties.

316. Defendant's harassment and provocation included repeated disclosure of false allegations, interference with parenting time, restriction of access to Plaintiff's communications and residence, as well as direct provocation through physical attacks, verbal insults, and other conduct designed to incite conflict and create emotional distress.

317. The aforementioned conduct was directed at Plaintiff without consent and caused substantial disruption, fear, and emotional distress. This conduct also included provocative behavior designed to elicit responses from Plaintiff, including physical aggression and verbal insults.

318. Defendant's conduct was willful, malicious, and unjustified, and directly caused harm and emotional distress to Plaintiff, including significant harm to his relationships with his children and emotional well-being.



319. Plaintiff incorporates all preceding paragraphs as if fully set forth herein.

320. Defendant Partner reasonably anticipated litigation and was aware of the potential for legal action after being served with divorce papers on or around January 12, 2026. Upon learning that

Plaintiff had discovered her social media posts containing false allegations, Defendant Partner deleted the posts, knowing they were false and could be used against her in litigation. Defendant Partner also took deliberate steps to conceal or destroy other evidence, including deleting text messages and electronic communications, with the intent to prevent Plaintiff from using these materials in support of his claims.

321. Specifically, Defendant Partner deactivated shared electronic accounts, including a cloud storage account, and disabled Plaintiff's access to text messages and personal data. Defendant also deleted social media accounts and communications, including personal Facebook profile containing defamatory posts and information about prior domestic violence or misconduct in Defendant's past relationships.

322. On or around January 24, 2026, Defendant Partner deleted one or more personal Facebook accounts, including posts and messages pertinent to the ongoing dispute, including communications with the Pastor and other church members. These deletions occurred after Plaintiff had notified Defendant of potential litigation, further evidencing the intentional nature of the actions.

323. Defendant Partner further destroyed or concealed evidence by deleting text messages, eliminating Facebook messages, and interfering with Plaintiff's access to electronic communications, including by inquiring whether the deletion of text messages was successful and whether Plaintiff still had access to those messages.

324. The conduct described above—including the deletion of Facebook accounts, destruction of text messages, and deactivation of shared accounts—resulted in the loss of critical evidence related to the underlying claims, including communications that may have been relevant to the allegations of abuse, harassment, and defamation.

325. The deleted materials included communications between Plaintiff, the Pastor, and church members, which were essential to establishing the factual basis for Plaintiff's claims

326. Defendant's actions constitute the spoliation of evidence, resulting in significant prejudice to Plaintiff's ability to prove damages and liability in this case. The destruction of relevant evidence impairs Plaintiff's ability to present a full and accurate account of the events that transpired, and Plaintiff has been unfairly deprived of the opportunity to present all relevant materials.

327. Defendant Partner's intentional destruction, alteration, and concealment of evidence has directly harmed Plaintiff by undermining his ability to substantiate his claims in this litigation, causing further emotional distress, reputational harm, and legal prejudice.

V. DAMAGES

328. As a direct and proximate result of Defendants' actions, Plaintiff has suffered:

- (a) Economic losses, including loss of housing, employment, and educational opportunities;
- (b) Non-economic losses, including emotional distress, anxiety, fear, and humiliation;

- (c) Loss of reputation and standing in the community;
- (d) Loss of parental access to minor children;
- (e) Other damages to be proven at trial.

VI. PRAYER FOR RELIEF

329. WHEREFORE, Plaintiff respectfully requests that the Court enter judgement in favor of Plaintiff and against Defendants as follows:

- A. Compensatory damages in an amount to be proven at trial;
- B. Punitive damages for intentional, malicious, or outrageous conduct;
- C. Pre-judgement and post-judgement interest;
- D. Costs and attorneys' fees as allowed by law
- E. An order preserving all evidence; and
- F. Any other relief the Court deems just and proper.

VII. JURY DEMAND

330. Plaintiff hereby demands a trial by jury on all claims so triable.

MINNESOTA
JUDICIAL
BRANCH