

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF RAMSEY

SECOND JUDICIAL DISTRICT

CASE TYPE: HARASSMENT

---

In the Matter of:

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

Madeline Sally Machla Lee,

Petitioner,

vs.

Kellye Strickland,

Respondent.

---

**DECLARATION OF KYLE T.  
MANDERFELD IN SUPPORT OF  
PETITIONER'S MOTION FOR  
CONTEMPT**

I, Kyle T. Manderfeld, hereby state and declare the following:

1. I am an attorney with the law firm of Barna, Guzy & Steffen, Ltd., counsel for Petitioner Madeline Lee.
2. A Harassment Restraining Order was issued in 62-HR-CV-24-963 on December 12, 2024. The Order explicitly prohibits Respondent Strickland from harassing Petitioner Lee. The Order remains active until December 12, 2026. See Exhibit 1.
3. Respondent Strickland created a webpage containing material harassing in nature towards Petitioner Lee found at <https://onionmadder.com/legal/lee/history>.
  - a. Harassing webpage reproduced a private and intimate drawing of Petitioner that was previously only accessible on Petitioner's private Telegram page. See Exhibit 2.
  - b. Harassing webpage frames Petitioner as a pedophile and reproduces private images found on Petitioner's private Telegram page. See Exhibits 3 and 4.
4. Petitioner had plans to deliver a guest lecture at a University in India. Although Petitioner did not promote this guest lecture, Respondent Strickland somehow learned of the event. Respondent sent Petitioner's University host professor an email implying the guest lecture invitation was "fabricated or altered." See Exhibit 5.
5. Petitioner has reported the webpage violation to law enforcement. Charges were not pursued. Moving for a finding of contempt is now the least restrictive remedy available to have Petitioner's rights and privacy enforced under the active Harassment Restraining Order.

6. The Minnesota Court of Appeals has previously upheld a District Court's finding of harassment and contempt when a Respondent to a HRO created a website containing personal, offensive, and exaggerated material about a Petitioner. *Miller v. Fredin*, A18-1154, 2019 WL 3293766 (Minn. Ct. App. 2019). This case is unpublished and cited as persuasive, not precedential authority. See Exhibit 6.
7. The Petitioner's exhibits for the Court's reference and submitted in conjunction with her Motion for Sanctions are true and correct copies of the following documentation:

Exhibit 1: Order Granting Harassment Restraining Order after Hearing

Exhibit 2: Screenshot of webpage found at onionmadder.com/legal/lee/history

Exhibit 3: Screenshot of webpage found at onionmadder.com/legal/lee/history

Exhibit 4: Screenshot of webpage found at onionmadder.com/legal/lee/history

Exhibit 5: Email sent from Respondent to Petitioner's University host

Exhibit 6: Copy of *Miller v. Fredin*

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

Dated: November 7, 2025  
Signed in Anoka County, Minnesota

By: /s/ Kyle T. Manderfeld  
Kyle T. Manderfeld #0505482  
Attorney for Petitioner  
200 Coon Rapids Blvd. NW, Suite 400  
Coon Rapids, MN 55433-5894  
Phone: (763) 780-8500