

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA
UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Kellye Strickland,
Plaintiff,

v. **Civil Action No. 0:25-cv-02056-DWF-DJF**

Ramsey County, et al.,
Defendants.

NOTICE REGARDING ALTERED COURT DOCUMENTS AND RETALIATORY CONDUCT

TO: The Honorable Donovan W. Frank, United States District Judge

Plaintiff Kellye Strickland respectfully submits this notice to inform the Court of ongoing irregularities, document tampering, and retaliatory conduct occurring within the underlying state court proceedings, Lee v. Strickland, Case No. 62-HR-CV-24-963, which form a central basis for the federal claims asserted herein.

I. Initial July 14 Hearing Notice (Authentic)

On July 14, 2025, Ramsey County issued a hearing notice for an August 19 hearing in the HRO matter. This version:

1. Bore the correct return address: Second Judicial District Court;

2. Appeared to be procedurally normal;
 3. Was issued prior to Plaintiff's motions for recusal or referee reassignment.
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II. Subsequent Mailing – Altered Version (Dated July 24, Received July 29)

On July 28, 2025, Plaintiff received a materially altered duplicate of the same hearing notice. This version:

1. Was mailed using the Ramsey County Domestic Abuse/Harassment Office (DAHO) return address, despite prior correction of that practice on May 23, 2025;
2. Was backdated with a file stamp reading "Filed July 24, 2025", although it was mailed after Plaintiff's recusal/referee objection motions were filed;
3. Contained an obscured or blacked-out metadata block, where digital filing history is normally visible;
4. Bundled Plaintiff's own July 14 and July 18 filings with it — suggesting the Court was mailing Plaintiff's own filings back to her;
5. Was sent after Plaintiff served spoliation notices on all parties via email (July 9) and certified mail (delivered July 17).

Plaintiff alleges this reissued notice was not clerical, but deliberately modified and remailed in response to Plaintiff's federal filing activity. The metadata was deliberately concealed, the return address reverted to a discredited label, and the mailing occurred only after Plaintiff's requests for judicial reassignment and recusal had been submitted. This suggests retaliatory coordination.

III. Improper Return Address Usage – Pattern of Reputational Abuse

The reintroduction of the “Domestic Abuse/Harassment Office” return address — previously corrected — appears calculated to cause reputational stigma and implied culpability in a domestic violence context. Plaintiff resides in multifamily housing with shared mail handling, and the use of this label is neither neutral nor random.

This is especially egregious given that the matter involves allegations of fraudulent use of the HRO process by Petitioner Lee — a fact known to Ramsey County at the time of this mailing.

Plaintiff asserts this label was used as a targeted act of humiliation, retaliation, and stigmatic punishment, violating due process and ADA protections.

IV. Sudden Assignment of Judge Nicole Starr – Received August 1

On August 5, 2025, Plaintiff received a notice assigning Judge Nicole Starr to the underlying HRO case. Judge Starr’s name had not appeared on any prior orders, filings, or notices in this matter.

Plaintiff acknowledges that this assignment followed Referee Jenese Larmouth’s voluntary recusal on July 31, 2025. However, after Judge Starr was assigned, the TylerTech court record system was retroactively modified to list her as the assigned judicial officer on hearings that took place before her assignment, including events overseen entirely by referees.

Plaintiff alleges that this retroactive reassignment was undertaken to:

- Falsely legitimize unsigned or procedurally defective orders;
- Shield referees from scrutiny or personal liability;
- Obscure the judicial history of the case and confuse future reviewers;

- Delay or complicate the impact of Plaintiff's motions and federal filings.

The backdating of judicial assignments in the official system is false and misleading, and contributes to the broader record manipulation documented herein.

V. Referee Jenese Larmouth's Withdrawal (July 31)

Despite denying Plaintiff's Request for Removal, Referee Jenese Larmouth voluntarily recused herself on July 31, 2025, only three days after:

- Plaintiff's amended complaint was filed in federal court naming her as a defendant;
- Plaintiff's objections were submitted and served;
- Irregularities with notice mailings and metadata concealment were flagged.

Larmouth's recusal was framed as discretionary, but her Findings of Fact misleadingly claimed that:

- No evidence had been submitted of the federal lawsuit (despite the July 11 letter);
- Objection was untimely (despite it being filed 7 days after reassignment);
- Bias was required for removal under Rule 107 (which is false).

Plaintiff asserts these claims were false, misleading, and part of an administrative attempt to preserve control over a procedurally compromised case.

SUMMARY OF FEDERAL IMPLICATIONS

The events described above reinforce and expand the following claims in the Amended Complaint:

1. **Post-hoc alteration of judicial documents** to undermine due process;

2. **Violation of a pending litigation hold** through record destruction or concealment;
3. **Use of stigmatic labeling to punish or intimidate Plaintiff;**
4. **Improper judicial reassignment to circumvent scrutiny;**
5. **Denial of meaningful access to the courts in violation of the ADA;**
6. **Monell liability against Ramsey County** for deliberate indifference and systemic procedural abuse.

Plaintiff respectfully requests that the Court take judicial notice of these developments and permit them to supplement the evidentiary record.

Dated: August 7, 2025

Respectfully submitted,

/s/ Kellye Strickland

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