

IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT
IN AND FOR SARASOTA COUNTY, FLORIDA

Case No.: 2026 DR 004778 NC
Division: FAMILY 1

VICTORIA EMMA SHINGLETON,

Petitioner,

v.

JOSHUA CONNER MOON,

Respondent.

RESPONDENT'S EMERGENCY MOTION TO DISSOLVE
AMENDED TEMPORARY INJUNCTION AS AN
UNCONSTITUTIONAL PRIOR RESTRAINT,
AND FOR RELATED RELIEF

Respondent, Joshua Moon, under Fla. Stat. § 784.0485(6)(b) and (10), moves on an emergency basis to dissolve the Amended Temporary Injunction for Protection Against Stalking entered *ex parte* on September 9, 2026 (the "Injunction"). The Petition was based entirely on words that other people wrote about the Petitioner on a user-generated content website. The Injunction exposes Respondent to warrantless arrest and felony prosecution if a stranger posts something "pertaining to" Petitioner, unless Respondent deletes and suppresses all discussion of her. That is a prior restraint, and federal law (47 U.S.C. § 230) prohibits this kind of relief. Further, Respondent's residence is in Clay County, not Sarasota County. Every day it remains in force inflicts irreparable constitutional injury upon Respondent. Respondent asks the Court to dissolve the Injunction immediately, or at the outset of the hearing presently set for September 22, 2026.

This motion is supported by **Exhibit 1**, the Declaration of Joshua Conner Moon, filed herewith, along with **Exhibits 2-4**. In support, Respondent states:

1.0 EMERGENCY NATURE OF THIS MOTION

1. The Injunction was entered *ex parte* on September 9, 2026, with no prior notice to Respondent, who was never served with the petition.

2. A hearing is set for Tuesday, September 22, 2026, at 10:00 a.m., before the Honorable Rochelle Curley, Courtroom 5A.

3. No law enforcement officer has served Respondent with the Petition, the notice of hearing, or the Injunction, as Fla. Stat. § 784.0485(4) and (8)(a)1 require. Moon Decl. ¶ 6.

4. Respondent learned of the Injunction on Friday, September 18, 2026, at 6:17 p.m. Eastern time, when Petitioner finally chose to email it to him. **Exhibit 2**; Moon Decl. ¶¶ 7–8, 11. In other words, the first notice that Respondent had of this was after the close of business on the last business day before a Tuesday hearing (as the Court is closed on Yom Kippur).

5. That email did not include the Affidavit or “Exhibit A”, which the Petition says contain the “[f]ull sworn facts, dates, quoted posts and URLs” supporting the requested relief. Respondent has never received either document. Moon Decl. ¶¶ 9–10. Nevertheless, the unlawful nature of the Injunction is apparent on the half record provided, as 47 U.S.C. § 230 prohibits this relief as does the First Amendment, and it does not even begin to approach the statutory requirements for a protection order.

6. “The loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury.” *Elrod v. Burns*, 427 U.S. 347, 373 (1976) (plurality opinion). Respondent should not be required to wait for dissolution. Moon Decl. ¶¶ 17–18.

7. Respondent makes this motion without waiving, and expressly preserving, all objections to service, notice, personal jurisdiction, venue, and the sufficiency of the Petition.

2.0 THE PETITION AND THE INJUNCTION

8. On Sept. 8, 2026, Petitioner, who resides in Ontario, Canada, signed a verified Petition against Respondent, who resides in Clay County. The Petition lists Respondent’s residence as “Unknown” and identifies a commercial address in Sarasota, “c/o Lolcow LLC.” It describes Respondent’s employment as “Lolcow LLC d/b/a Kiwi Farms (lolcow.farm).”

9. The Petitioner alleges stalking, from “12/2016 to present.” But this “stalking” is nothing more than comments *about* Petitioner (not *to* Petitioner) posted *by third parties* on a forum website. It alleges that Respondent “owns and operates the website ‘Kiwi Farms’”; that from “Dec. 2016 to Jan. 2026” there were “20+ threads” about Petitioner, which “all remain online”; and that the site contains a “[p]ost urging readers” to take certain actions, “[p]osters [who] self-identify as ‘stalkers,’” and other “posts” Petitioner considers “[s]exualized, ableist and defamatory.”

10. The Petition complains of content written by “readers,” “[p]osters,” and “posts.” However, the Petition does not note a single word that Respondent himself wrote, sent, or directed to Petitioner. 47 U.S.C. § 230 requires dissolution, even if the Petition were otherwise valid.

11. The Petitioner says that the Respondent failed to take the third party produced content down: “Actual notice and refusal: 2016 takedown demands; written cease-and-desist 8/29/2026. No response; no removal.” This is not “stalking” and again, 47 U.S.C. § 230 requires dissolution.

12. The Petition does not allege any in-person contact, any communication from Respondent to Petitioner, nor any threatened use of a weapon, no criminal history, and no prior protective orders. Petitioner did not check the box for weapons and wrote that any weapons were “Unknown.” She unjustifiably requested a firearms prohibition as part of a final judgment, but did not even request it as part of a temporary injunction. *Compare* Pet. § IV.1, *with* Pet. § IV.2.d.

13. On that record, the Court entered the Injunction, finding that Petitioner’s sworn statements “make it appear that Section 784.0485, Florida Statutes, applies to the parties, and that stalking exists.” The Injunction orders that Respondent “shall not commit, or cause any other person to commit, any acts of stalking against Petitioner, including . . . cyberstalking” (§ 1). It also bars Respondent from contacting Petitioner “directly or indirectly . . . through another person, or in any other manner, including any electronic means or use of social media” (§ 2.a), and from using or possessing any firearm or ammunition (§ 3.b). The Injunction authorizes warrantless arrest for any violation (§ V §§ 2–3).

14. The record does not support those findings. If it did, it would violate both the Constitution and federal immunity law.

3.0 FACTS

15. Petitioner promotes herself publicly, as “*Victoria Bella-Morte*” and “*Miss Victoria Murder*,” as a model, tattoo artist, and alternative-scene personality.¹ Her public biographies claim magazine features and covers in *Elite*, *Tattoo Lifestyle*, *Inked*, and *Tattooed Girls*, and call her a “2 Time cover girl.”² She publishes her work on YouTube under both names,³ and she marketed

¹Victoria Bella Morte, Model Mayhem, <https://www.modelmayhem.com/VictoriaMurder> (joined Sept. 23, 2009).

²Victoria Bella-Morte, Flickr, <https://www.flickr.com/people/89322476@N04/> (joined 2012); Victoria Bella-Morte, LinkedIn, <https://ca.linkedin.com/in/victoria-bella-morte-0a5a1899>; see also Victoria “Murder” Bella-Morte, Artmystic (Feb. 5, 2013), <https://artmystic.wordpress.com/2013/02/05/victoria-murder-bella-morte/>; *Inked Girls: Victoria Bella-Morte*, Inked Mag., <http://www.inkedmag.com/girls/victoria-bella-morte/> (archived).

³Victoria Bella-Morte, *Realism Tattoo Time Lapse*, YouTube (Feb. 21, 2016), <https://www.youtube.com/watch?v=v5qgxyxLz7E> (video description identifying the artist as “Victoria Bella-Morte aka Miss Victoria Murder”).

her “Bella Morte Studios” through a website and an Instagram account advertising her experience and magazine work.⁴

16. Petitioner initiated the conflict here. In 2016, users of lolcow.farm, *a website unconnected to Respondent*, started discussing her public persona. On September 27, 2016, Petitioner responded by sending Respondent a message styled as a law-enforcement (“LEO”) notice, demanding that “all content” be removed from a lolcow.farm thread within 24 hours or he would “have the authorities to deal with.” Respondent has never had any connection to lolcow.farm, and at the time Kiwi Farms had no thread about her. Moon Decl. ¶¶ 4, 12–13; **Exhibit 3**.⁵ Kiwi Farms users began discussing Petitioner on December 24, 2016, nearly three months after that message. Moon Decl. ¶ 13.⁶ Three days later, on December 27, 2016, Petitioner submitted a DMCA complaint to Cloudflare concerning kiwifarms.net. Moon Decl. ¶ 14; **Exhibit 4**. Her complaint acknowledged that the thread had been started “on Christmas eve,” and it referred to having had content removed from “their site” the “last time.” Ex. 4.⁷ Repeated DMCA complaints can result in a forum being suspended. Moon Decl. ¶ 14.

⁴Home, Bella Morte Studios, <https://mvminksend.wixsite.com/bellamortestudios>; Victoria Bella-Morte Tattoos (@victoriabellamorte), Instagram, <https://www.instagram.com/victoriabellamorte/>; Wellington-Dufferin-Guelph Pub. Health, *Safer Tattooing and Body Piercing*, HPDCD(FS)32 (rev. Oct. 27, 2017), https://wdgpublichealth.ca/sites/default/files/file-attachments/basic-page/safer_tattooing_and_body_piercing_hpdcdfs32_rev_2017-10-27.pdf (listing Bella Morte Studios among Guelph tattoo studios).

⁵*See also* Miss Victoria Murder, Encyclopedia Dramatica, https://edramatica.com/Miss_Victoria_Murder (describing Kiwi Farms as unaffiliated with lolcow.farm and unaware of Petitioner until her emails arrived).

⁶Victoria Shingleton / Victoria BellaMorte / Miss Victoria Murder / mvminksend, Kiwi Farms (Dec. 24, 2016), <https://kiwifarms.net/threads/victoria-shingleton-victoria-bellamorte-miss-victoria-murder-mvminksend.26853/> (opening post describing threatening emails from a previously unknown sender, prompted by commentary on lolcow.farm, “a completely unrelated imageboard”).

⁷*Id.* (reproducing Cloudflare notice of a DMCA complaint submitted by “Victoria Shingleton” concerning kiwifarms.net); *see also* /pt/ - Vicky Shingles / Miss Victoria Murder / Victoria Bella

17. For nearly ten years, Petitioner has participated in a public controversy that she began: by knowingly and voluntarily seeking the spotlight, then attacking anyone who criticized her by email, by takedown demands, and now by this Petition. One who “voluntarily injects himself or is drawn into a particular public controversy” becomes a public figure for that controversy. *Gertz v. Robert Welch, Inc.*, 418 U.S. 323, 351 (1974). Commentary on Petitioner’s public self-promotion, and on the controversy she started, serves a legitimate purpose and is protected speech. *See Logue v. Book*, 297 So. 3d 605 (Fla. 4th DCA 2020) (reversing a stalking injunction awarded to an activist as outside the stalking statute and violating the First Amendment). A stalking injunction is not a means of silencing one side of a decade-old public dispute. *Id.*

18. Respondent did not author any of the statements. Third-party users of the website did. The website is a social media site that contains user generated content. Respondent had no part in creating the content the Petitioner complains about. Moon Decl. ¶¶ 3, 5.

19. Respondent’s only post in the forum thread ever that concerned Petitioner was made in 2016. Petitioner threatened to involve law enforcement against him if he did not remove comments about her. Respondent mocked that threat. His comment made no threat and was neither sent nor directed to Petitioner. Respondent has posted nothing about Petitioner since December 2016. Moon Decl. ¶¶ 12–13.

20. Respondent has never met Petitioner, never called her, and never been anywhere near her. The only communications he has ever sent to her were replies to emails she sent him in 2016. Moon Decl. ¶ 15.

Morte / Victoria Shingleton, lolcow.farm, <https://lolcow.farm/pt/res/735539.html> (thread header noting DMCA attempts against lolcow.farm and Kiwi Farms).

21. The facts of the Petition are not even accurate. Kiwi Farms is not located at lolcow.farm. That is a completely different website, operated by other people, with whom Respondent has no connection. Petitioner has confused the two sites since 2016 and seems to be unwilling to note the difference. Moon Decl. ¶¶ 4, 12, 14, 16.

22. Respondent does not reside in Sarasota County. The Sarasota address in the Petition is neither his residence nor his place of work, and Kiwi Farms is not operated from that address. Moon Decl. ¶ 2. Respondent preserves his venue objection: Fla. Stat. § 784.0485(1)(f).

23. The only communication from Petitioner to Respondent that was at all recent is an email dated August 25, 2026, not August 29, which was sent to Respondent’s address at a separate nonprofit organization, not his personal or business address. Moon Decl. ¶ 16.

4.0 ARGUMENT

4.1 The Injunction is an unlawful prior restraint on speech.

24. “[A] temporary injunction directed to speech is a classic example of prior restraint on speech triggering First Amendment concerns.” *Vrasic v. Leibel*, 106 So. 3d 485, 486 (Fla. 4th DCA 2013). *See also Budlove v. Johnson*, 377 So. 3d 206 (Fla. 2d DCA 2023) (same). “[P]rior restraints on speech and publication are the most serious and the least tolerable infringement on First Amendment rights.” *Neb. Press Ass’n v. Stuart*, 427 U.S. 539, 559 (1976); *accord Concerned Citizens for Judicial Fairness, Inc. v. Yacucci*, 162 So. 3d 68, 73 (Fla. 4th DCA 2014). Any prior restraint comes to court “bearing a heavy presumption against its constitutional validity.” *Bantam Books, Inc. v. Sullivan*, 372 U.S. 58, 70 (1963). This Injunction fails to overcome that presumption.

25. The Injunction does not use the word “remove,” but that is what it requires. The Respondent risks arrest if he does not remove that which federal law says he cannot be compelled to remove. Florida law defines “cyberstalk” to include causing words to be communicated, “directly or indirectly,” that are “directed at or pertaining to a specific person.” Fla. Stat. §

784.048(1)(d)1. The Petition argues that Respondent cyberstalks Petitioner *by operating a website where others write about her and by declining to delete what they wrote*. Paragraph 1 of the Injunction forbids Respondent to “cause any other person to commit” cyberstalking. Paragraph 2.a forbids “indirect[]” contact “through another person” by “any electronic means.” Read together with the Petition, these provisions expose Respondent to arrest without a warrant, and to prosecution under § 784.048(4), if any user posts anything “pertaining to” Petitioner or whenever existing posts remain online. The Injunction is a prior restraint with extra steps.

26. The only way Respondent can be safe from these consequences is to delete every post discussing Petitioner and to suppress all future discussions. That is a speech ban, entered without notice, and without due process.⁸ The effects of this restraint are not hypothetical: Respondent has already stifled his own speech that he would otherwise engage in because he cannot reasonably interpret the vague injunction. Moon Decl. ¶¶ 17–18.

27. Florida’s appellate courts do not tolerate injunctions that restrain online speech. *See Chevaldina v. R.K./FL Mgmt., Inc.*, 133 So. 3d 1086 (Fla. 3d DCA 2014) (injunction against repeated insulting blog posts that annoyed petitioner held to be unlawful prior restraint); *David v. Textor*, 189 So. 3d 871, 876 (Fla. 4th DCA 2016) (online posts; injunction would violate First Amendment); *Krapacs v. Bacchus*, 301 So. 3d 976, 980 (Fla. 4th DCA 2020) (injunction against posts about a person was unconstitutional prior restraint); *Logue v. Book*, 297 So. 3d 605, 620 (Fla. 4th DCA 2020) (reversing stalking injunction based on offensive online speech as not fitting the statute nor complying with the First Amendment); *Budlove*, 377 So. 3d at 211 (reversing portions of stalking injunctions that restrained public statements); *Scott v. Blum*, 191 So. 3d 502, 504 (Fla. 2d DCA 2016) (reversing injunction on evidentiary grounds).

⁸ It also violates the First Amendment and 47 U.S.C. § 230.

28. The Supreme Court of Georgia reversed an injunction on nearly identical facts: a stalking protective order had directed a message-board operator to delete “all posts relating to” the petitioner, most of which were written by other users. *Chan v. Ellis*, 296 Ga. 838, 770 S.E.2d 851 (2015). As here, the posts appeared on the respondent’s website, and he never caused them to be delivered to the petitioner. *Id.* at 838. The court held that “[t]he publication of commentary directed only to the public generally does not amount to ‘contact,’” *id.* at 841, reasoning that applies here.

29. The Injunction is unlawfully vague. A violation turns on what unknown third parties choose to write, and Respondent has no control over what these parties might choose to say. Moon Decl. ¶ 17. The statute itself excludes “constitutionally protected activity” from any “course of conduct.” Fla. Stat. § 784.048(1)(b). Speech only loses First Amendment protection as a “true threat” if there is proof as to the *speaker’s* own culpable mental state. *Counterman v. Colorado*, 600 U.S. 66 (2023). But this Order seems to be from a form that may predate *Counterman*.

4.2 47 U.S.C. § 230 forbids treating Respondent as a publisher or speaker of third-party-produced content.

30. 47 U.S.C. § 230 is not new. It was enacted in 1996.

31. “No provider or user of an interactive computer service shall be treated as the publisher or speaker of any information provided by another information content provider.” 47 U.S.C. § 230(c)(1). “No cause of action may be brought and no liability may be imposed under any State or local law that is inconsistent with this section.” *Id.* § 230(e)(3). The Florida Supreme Court held that Section 230 “expressly bars ‘any actions’” against the operators of an interactive computer service for statements made by third parties. *Doe v. Am. Online, Inc.*, 783 So. 2d 1010, 1018 (Fla. 2001); *see Zeran v. Am. Online, Inc.*, 129 F.3d 327, 330 (4th Cir. 1997).

32. Section 230 bars claims under Florida’s cyberstalking statute if the claim targets third-party posts. *Universal Commc’n Sys., Inc. v. Lycos, Inc.*, 478 F.3d 413, 422 (1st Cir. 2007)⁹, held that imposing liability under Fla. Stat. § 784.048 for message-board posts written by users would treat the provider “as the publisher” of “information provided by another information content provider,” and affirmed dismissal. *Lycos* also made clear that notice of the content does not defeat Section 230 immunity. *Id.* Petitioner’s “takedown demands” and “cease-and-desist” are legally meaningless.

33. Section 230 applies to injunctive relief as well as damages claims. An order compelling a website to remove user content “treats [the website] as ‘the publisher or speaker of . . . information provided by another information content provider.’” *Hassell v. Bird*, 5 Cal. 5th 522, 534-535 (2018) (plurality opinion). Courts in this State apply the same rule to injunctive relief sought against website operators for third-party posts. *See Roca Labs, Inc. v. Consumer Op. Corp.*, 140 F. Supp. 3d 1311 (M.D. Fla. 2015) (Section 230 barred claims against a user generated content site, including for declaratory relief, against consumer-review website, and in that case the court denied Roca Labs’ request for a preliminary injunction as an unlawful prior restraint).

34. This broad federal immunity applies unless the Respondent created or developed the offending content. Petitioner does not allege that Respondent created or developed any of it, and he did not. Moon Decl. ¶¶ 3, 5. The Petition attributes the content to “readers” and “[p]osters” – this is classic Section 230 immunity. The single post Respondent did write, *ten years ago*, that had any connection to Petitioner, is not a threat, is not a “course of conduct,” and cannot support *ex parte* censorial relief in 2026.

⁹ While this is a First Circuit case, it interpreted Florida law.

4.3 The Petition does not establish stalking nor a basis for ex parte relief.

35. Stalking requires that the respondent “willfully, maliciously, and repeatedly follow[], harass[], or cyberstalk[]” the petitioner. Fla. Stat. § 784.048(2). Cyberstalking in turn requires a course of conduct causing substantial emotional distress, measured by a reasonable-person standard, and serving no legitimate purpose. *Id.* § 784.048(1)(d); *David*, 189 So. 3d at 875; *Hoover v. Peak*, 392 So. 3d 261, 263 (Fla. 1st DCA 2024); *Savage v. Bustillo*, 397 So. 3d 1198, 1201 (Fla. 1st DCA 2024) (noting that petitioner bears the burden to show repeated acts of following, harassment, or cyberstalking). The Petition does not allege a single act by Respondent – only speech from others. Respondent is only accused of failing to remove other people’s speech. The Second DCA recently reversed a stalking injunction for that reason. The petitioner there blamed the respondent for messages and reviews posted from other online accounts but offered nothing tying the respondent to them, and the court ruled that her “conclusory assertion on that point is insufficient.” *Benhalima v. Iakovenko*, No. 2D2025-2977, slip op. at 8 (Fla. 2d DCA July 29, 2026). Petitioner does not even make that assertion here; her Petition attributes the content to “readers” and “[p]osters.” In other words, there is no conclusory speculation, as the Petitioner herself pleads facts that make it clear that this is all about third party content.

36. The *ex parte* procedure is there when there is an “immediate and present danger of stalking.” *See* Fla. Stat. § 784.0485(5)(b). The Petition tells a story of an online conflict that began in 2016. The latest activity it identifies is from January 2026, eight months before the Petition. Nothing in the Petition describes a new or imminent act by anyone, much less by Respondent. The only recent event it identifies is Petitioner’s own demand that content be removed.

37. The 2021 amendment extended “cyberstalk” to communications “pertaining to” a person, but that extension must remain subordinate to the First Amendment. The statute itself excludes “constitutionally protected activity” from any course of conduct, Fla. Stat. §

784.048(1)(b). Commentary to the public about a public person does not lose that protection because its subject does not like how the commentary goes. Florida courts reverse injunctions based on online posts that are about a person rather than directed to her. *Horowitz v. Horowitz*, 160 So. 3d 530, 531 (Fla. 2d DCA 2015); *Chevaldina v. R.K./FL Mgmt., Inc.*, 133 So. 3d 1086, 1092 (Fla. 3d DCA 2014). The Second DCA, applying the amended statute, still holds that “emails, articles, blog posts, and videos that contain false allegations or embarrassing information are not sufficient for purposes of imposing a cyberstalking injunction.” *Benhalima*, slip op. at 7. An injunction that reaches public commentary merely because it “pertain[s] to” Petitioner restrains protected speech. *See Krapacs*, 301 So. 3d at 980; *David*, 189 So. 3d at 876.

4.4 The firearms prohibition has no basis in the Petition.

38. Petitioner did not allege that Respondent possesses, used, or threatened to use any weapon. She did not even *ask* for a firearms prohibition in the temporary injunction. Pet. §§ III.4.e, III.6, IV.1–2. Even if she did, it would be unreasonable to grant an order restraining Moon’s Second Amendment rights and his right to bear arms under article I, section 8 of the Florida Constitution because someone who lives across an international border claims to be troubled by him. Even if he were somehow guilty of “cyberstalking” this has nothing to do with his Second Amendment rights, and he would not be able to bring a gun to Canada in the first place.

39. The statute expressly restricts firearms only in a final judgment entered after notice and a hearing. Fla. Stat. §§ 784.0485(6)(e), 790.233. The Second DCA holds that “neither section 790.233 nor section 784.0485 provide express statutory authority for a court to prohibit a person from possessing firearms or ammunition upon the issuance of a temporary injunction for protection against stalking.” *Dean v. Bevis*, 322 So. 3d 167 (Fla. 2d DCA 2021). The petitioner in *Dean* at least claimed fear of the respondent’s “access to firearms,” yet the court still reversed the firearms ban because there was no showing of significant danger from the firearms, and those provisions

therefore infringed his right to keep and bear arms under article I, section 8 of the Florida Constitution. *Id.* Petitioner here alleged nothing about weapons at all. The Injunction nonetheless deprives Respondent of his rights under article I, section 8 of the Florida Constitution, and the Second Amendment, without notice, a hearing, or any allegation involving weapons. Nothing in the record supports this. Most notably, Petitioner has an international border between herself and Respondent – a border that he could not cross with weapons, even if he wanted to. Paragraph 3.b must be stricken.

4.5 The Court is the Wrong Jurisdiction and Venue.

40. Petitioner resides in Canada. Respondent resides in Clay County, Florida. For this reason alone, the matter should be dismissed or transferred to Clay County for any further proceedings. Fla. Fam. L. R. P. 12.060(b). Nevertheless, the injunction must be dissolved immediately, as it violates the First Amendment and federal immunity in 47 U.S.C. § 230, and the exigency of the violations require dissolution immediately, and then dismissal or transfer.

5.0 REQUEST FOR IMMEDIATE HEARING

41. Respondent requests that the Court rule on this motion on the papers or at the earliest available time, and in any event at the outset of the September 22, 2026 hearing, before taking evidence on the Petition.

6.0 RELIEF REQUESTED

42. WHEREFORE, Respondent Joshua Conner Moon respectfully requests that the Court enter an order dissolving the Amended Temporary Injunction for Protection Against Stalking entered September 9, 2026, effective immediately; and/or any other relief the Court deems just and proper.

43. To whatever extent the Court declines to do so, Respondent requests a stay of the injunction pending an emergency appeal.

CERTIFICATION OF EMERGENCY

Undersigned counsel certifies that he believes in good faith that a true emergency exists. Petitioner gave notice of the Injunction by email after the close of business on the Friday before a Tuesday hearing (with a court holiday on the Monday). Ex. 2. The Injunction restrains First and Second Amendment rights without prior notice, and each day it remains in effect causes irreparable injury that cannot be remedied after the fact.

Dated: September 21, 2026.

Respectfully Submitted,

/s/ Marc J. Randazza
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Counsel for Respondent

CERTIFICATE OF SERVICE

I hereby certify that on September 21, 2026, the foregoing was filed with the Clerk of Court via the Florida Courts E-Filing Portal and was served by electronic mail upon Petitioner, Victoria Emma Shingleton, *pro se*, at mvminksend@gmail.com, and upon all other persons entitled to service.

/s/ Marc J. Randazza
Counsel for Respondent

Exhibit 1

Declaration of Joshua Conner Moon

**IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT
IN AND FOR SARASOTA COUNTY, FLORIDA**

**Case No.: 2026 DR 004778 NC
Division: FAMILY 1**

VICTORIA EMMA SHINGLETON,

Petitioner,

v.

JOSHUA CONNER MOON,

Respondent.

DECLARATION OF JOSHUA CONNER MOON

I, Joshua Conner Moon, declare as follows:

1. I am the Respondent in this action. I am over the age of eighteen and competent to make this declaration. I have personal knowledge of the facts stated in it.

2. I reside in Clay County, Florida. I do not reside, and have never resided, in Sarasota County. The Sarasota address listed for me in the Petition, 8051 N. Tamiami Trail, Ste. E6, is not my residence or my place of work, and Kiwi Farms is not operated from that address.

3. I operate the Internet forum known as Kiwi Farms. Its registered users write and post their own messages. The content Petitioner complains about was written and posted by those users, not by me.

4. [Lolcow.farm](#) is a different website, operated by other people. I have never owned, operated, controlled, or had any relationship with [lolcow.farm](#).

5. I did not write, and took no part in writing, any of the posts or statements quoted or described in the Petition. I did not solicit, direct, request, approve, or edit any of them.

6. I have never been personally served with the Petition, any notice of hearing, the Temporary Injunction, or the Amended Temporary Injunction in this case. No law-enforcement

officer, process server, or other person has handed me, or left at my residence, any paper in this case.

7. At 6:17 p.m. Eastern Time on Friday, September 18, 2026, I received an email from the address <mvminksend@gmail.com>, signed “Victoria Shingleton.”

8. The email stated that it attached the Amended Temporary Injunction for Protection Against Stalking entered against me on September 9, 2026, together with the Petition, and that the final hearing was set for Tuesday, September 22, 2026, at 10:00 a.m. Eastern before the Honorable Rochelle Curley at 2002 Ringling Blvd., Sarasota, Florida. That email was the first notice I received of the Amended Temporary Injunction and of the final hearing.

9. The email contained a message stating I was to appear in this Court, and a single attachment: a PDF file named “ORDER_Temporary_Injunction_2026-09-09_clean.pdf”. This PDF contains an amended and signed order, followed by the original petition.

10. I have not received, from Petitioner or from any other source, the affidavit or the “Exhibit A” referenced in the Petition.

11. A true and correct copy of the email described above is attached to Respondent’s Emergency Motion as **Exhibit 2**. It accurately shows the sender, date, time, text, and attachment of the email I received.

12. On September 27, 2016, a message was submitted through the contact form of the Lolcow Email service and delivered to my address, <josh@lolcow.email>. Its subject line was “LEO - criminal harassment, copyright violations,” and its reply-to address was <legal.report@outlook.com>. It demanded that “all content” be removed from a thread on [lolcow.farm](#) within 24 hours, said that “the victim resides” in Canada, and warned that I would

“have the authorities to deal with” if the content was not removed. A true and correct copy of that message, as it appears in my email account, is attached as **Exhibit 3**.

13. I had no connection to lolcow.farm then and have none now. When that message arrived, Kiwi Farms had no thread about Petitioner. The first Kiwi Farms thread about her was created by a user, not by me, on December 24, 2016, nearly three months later. My only post in that thread about Petitioner was made in December 2016. It mocked her threats to involve law enforcement against me. It contained no threat, and I did not send it or direct it to her. I have posted nothing about Petitioner since December 2016.

14. On December 27th, 2016, three days after that thread was created, Petitioner sent a complaint to Cloudflare, an unrelated technology company that provided network services to Kiwi Farms, reporting the Kiwi Farms thread about her. In it, she claimed that a Kiwi Farms user had been harassing her “through lolcow.com,” which is not a domain that Kiwi Farms has ever been on and is not property of Lolcow LLC. A notice of that kind to a site’s network provider can lead the provider to terminate service altogether, which would have taken the entire website offline—not merely the material Petitioner complained about. In this complaint, she invoked U.S. and Canadian law and the Attorney General of Canada, and she stated that the thread had been started “on Christmas eve.”

15. In a brief subsequent email exchange regarding copyright, Petitioner continuously cited Canadian law, threatened to have me extradited for cyberbullying, referenced posts made by people who are not myself, and on websites I do not operate. The email exchange ended on December 27th, 2016, the same day the Cloudflare complaint was received, with my message “The Kiwi Farms is not about you”. I wrote my side of that exchange from the <legal@kiwifarms.net> address, using the name “Lorin O’Landry.” True and correct copies of Cloudflare’s December 27,

2016, notice of Petitioner’s complaint and of the emails exchanged that evening, as maintained in that email account, are attached as **Exhibit 4**. I have redacted Petitioner’s street address from the Cloudflare notice and omitted duplicate copies of the same messages. Apart from that exchange, I have never sent Petitioner any communication. I have never met her, never spoken with her by telephone, and never been to Ontario or anywhere near her.

16. On August 28th, 2026, almost ten years later with no intermediary correspondence that I am aware of, Petitioner again attempted to contact me through my email address with the nonprofit organization the United States Internet Preservation Society (USIPS). This email was titled “FINAL LEGAL NOTICE — Doxxing, Harassment, Safety Threats, Privacy Violations, Defamation and Copyright Infringement”. In this, she dedicates entire paragraphs to irrelevant Canadian law, misidentifies my website as being “Lolcow Farm”, complains about copyright infringement without any specific identification of allegedly infringed material, and attaches a demand for preservation of evidence. I did not reply to this email.

17. Since learning of the Amended Temporary Injunction on September 18, 2026, I have governed my conduct by it. It forbids me to “cause any other person to commit” cyberstalking against Petitioner and to contact her “indirectly” through another person or by electronic means. I cannot control what users post on Kiwi Farms, and I cannot know in advance what they will post. I cannot tell whether a post someone else writes about Petitioner, or a post that simply remains online, would be treated as a violation by me, and I understand that a violation could lead to my arrest without a warrant.

18. There is speech I want to engage in, including discussing this very case and fundraising to defend it. Because the Amended Temporary Injunction is so broad and I cannot tell what it permits, I have refrained from that speech.

Under penalties of perjury, I declare that I have read the foregoing Declaration and that the facts stated in it are true.

Executed on September 21, 2026.

A handwritten signature in black ink, appearing to read "Joshua Moon", written over a horizontal line.

Joshua Conner Moon

Exhibit 2

Email from Petitioner to Respondent
September 18, 2026

----- Original Message -----

On Friday, 09/18/26 at 18:17 V S <mvminksend@gmail.com> wrote:

Mr. Moon: Attached is the Amended Temporary Injunction for Protection Against Stalking entered against you on September 9, 2026, in Case No. 2026 DR 004778 NC, Circuit Court, Sarasota County, Florida, with the Petition. The final hearing is Tuesday, September 22, 2026, at 10:00 a.m. Eastern before the Hon. Rochelle Curley, [2002 Ringling Blvd., Sarasota, FL](#). — Victoria Shingleton

One attachment • Scanned by Gmail ⓘ  Add to Drive



IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT, IN
AND FOR SARASOTA COUNTY, FLORIDA

Case No.: 2026 DR 004778 NC

Division: FAMILY 1

VICTORIA EMMA SHINGLETON,

Petitioner,

And

JOSHUA CONNOR MOON,

Respondent.

AMENDED
TEMPORARY INJUNCTION FOR PROTECTION AGAINST STALKING
(Amended to correct name of Petitioner)

The Petition for Injunction for Protection Against Stalking under Section 784.0485, Florida Statutes, and other papers filed in this Court have been reviewed. Under the laws of Florida, the Court has jurisdiction of the Petitioner and the subject matter, and has jurisdiction of the Respondent upon service of the temporary injunction. The term Petitioner as used in this injunction includes the person on whose behalf this injunction is entered.

It is intended that this protection order meet the requirements of 18 U.S.C. Section 2265 and therefore intended that it be accorded full faith and credit by the court of another state or Indian tribe and enforced as if it were the order of the enforcing state or of the Indian tribe.

SECTION I. NOTICE OF HEARING

Because this Temporary Injunction for Protection Against Stalking has been issued without notice to Respondent, Petitioner and Respondent are instructed that they are scheduled to appear and testify at a hearing regarding this matter on TUESDAY, 09/22/2026, at 10:00AM, when the Court will consider whether it should issue a Final Judgment of Injunction for Protection Against Stalking, which shall remain in effect until modified or dissolved by the Court, and whether other things should be ordered. The hearing will be before The Honorable ROCHELLE CURLEY, at Courtroom 5A - 2002 Ringling Blvd. Sarasota, Florida. If Petitioner and/or Respondent do not appear, this temporary injunction may be continued in force, extended, or dismissed, and/or additional orders may be granted, including entry of a permanent injunction and the imposition of court costs. All witnesses and evidence, if any, must be presented at this time. **Petitioner and Respondent will be bound by the terms of any injunction or order issued at the final hearing.**

IF EITHER PETITIONER OR RESPONDENT DO NOT APPEAR AT THE FINAL HEARING, HE OR SHE WILL BE BOUND BY THE TERMS OF ANY INJUNCTION OR ORDER ISSUED IN THIS MATTER.

NOTICE: Because this is a civil case, there is no requirement that these proceedings be transcribed at Florida Supreme Court Approved Family Law Form 12.980(u), Temporary Injunction for Protection Against Stalking (03/15)

public expense.

YOU ARE ADVISED THAT IN THIS COURT:

- a. ☐ a court reporter is provided by the court.
- b. ☒ electronic recording only is provided by the court. A party may arrange in advance for the services of and provide for a court reporter to prepare a written transcript of the proceedings at the party's expense.

A RECORD, WHICH INCLUDES A TRANSCRIPT, MAY BE REQUIRED TO SUPPORT AN APPEAL. THE PARTY SEEKING THE APPEAL IS RESPONSIBLE FOR HAVING THE TRANSCRIPT PREPARED BY A COURT REPORTER. THE TRANSCRIPT MUST BE FILED WITH THE REVIEWING COURT OR THE APPEAL MAY BE DENIED.

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact the ADA Coordinator at the Sarasota County Jury Office, P.O. Box 3079, Sarasota, Florida 34230-3079, telephone (941) 861-8000, at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

SECTION II. FINDINGS

The statements made under oath by Petitioner make it appear that Section 784.0485, Florida Statutes, applies to the parties, and that stalking exists.

SECTION III. TEMPORARY INJUNCTION AND TERMS

This injunction shall be in effect until the hearing set above and in no event for longer than 15 days, unless extended by court order. If a final order of injunction is issued, the terms of this temporary injunction will be extended until service of the final injunction is effected upon Respondent. This injunction is valid and enforceable in all counties of the State of Florida. The terms of this injunction may not be changed by either party alone or by both parties together. Only the Court may modify the terms of this injunction. Either party may ask the Court to change or end this injunction.

Willful violation of the terms of this injunction, such as: committing an act of stalking against Petitioner; going to or being within 500 feet of Petitioner's residence, place of employment, school, or other place prohibited in this injunction; knowingly and intentionally coming within 100 feet of Petitioner's motor vehicle, whether or not that vehicle is occupied; committing any other violation of this injunction through an intentional unlawful threat, word or act to do violence to Petitioner; telephoning, contacting or communicating with Petitioner, unless indirect contact through a third party is specifically allowed by this injunction; defacing or destroying Petitioner's personal property, including Petitioner's motor vehicle; or refusing to surrender firearms or ammunition if ordered to so by the Court, constitutes a misdemeanor of the first degree punishable as provided by Sections 775.082 and 775.083, Florida Statutes.

Any party violating this injunction may be subject to civil or indirect criminal contempt proceedings,

including the imposition of a fine or imprisonment, and also may be charged with a crime punishable by a fine, jail, or both, as provided by Florida Statutes.

ORDERED and ADJUDGED:

1. **Prohibited Actions.** Respondent shall not commit, or cause any other person to commit, any acts of stalking against Petitioner, including stalking, cyberstalking, aggravated stalking, or any criminal offense resulting in physical injury or death. Respondent shall not commit any other violation of this injunction through an intentional unlawful threat, word, or act to do violence to Petitioner.
2. **No Contact. Respondent shall have no contact with the Petitioner unless otherwise provided in this section.**
 - a. Unless otherwise provided herein, Respondent shall have no contact with Petitioner. Respondent shall not directly or indirectly contact Petitioner in person, by mail, e-mail, fax, telephone, through another person, or in any other manner, including any electronic means or use of social media. Further, Respondent shall not contact or have any third party contact anyone connected with Petitioner's employment or school to inquire about Petitioner or to send any messages to Petitioner. Unless otherwise provided herein, **Respondent shall not go to, in, or within 500 feet of:**
 - b. Petitioner's current residence: Confidential. Or any residence to which Petitioner may move;
 - c. Petitioner's current or any subsequent place of employment;
 - d. where Petitioner attends school: ; or
 - e. the following other places (if requested by Petitioner) where Petitioner, specific members of Petitioner's family, or individuals closely associated with Petitioner, regularly frequent: .
 - f. Respondent **shall not** knowingly and intentionally come within 100 feet of Petitioner's motor vehicle at any time, whether or not that vehicle is occupied;
 - g. Other provisions regarding contact: .
3. **Firearms.**

[Initial all that apply; write N/A if does not apply]

 - a. N/A Respondent is a state or local officer, as defined in section 943.10(14), Florida Statutes, who holds an active certification, who receives or possesses a firearm or ammunition for use in performing official duties on behalf of the officer's employing agency, and is not prohibited by the court from having in his or her care, possession, or control any firearm or ammunition.
 - b. TK Respondent shall not use or possess a firearm or ammunition.
 - c. N/A Respondent shall surrender any firearms and ammunition in the Respondent's possession to the Sarasota County Sheriff's Department.
 - d. N/A Other directives relating to firearms and ammunition: .
4. **Mailing Address or Designated E-Mail Address(es).** Respondent shall notify the Clerk of the Court of any change in either his or her mailing address or designated e-mail address(es) within 10 days of the change. All further papers (excluding pleadings requiring personal service) shall be served either by mail to Respondent's last known mailing address or by e-mail to Respondent's designated e-mail address(es). Service shall be complete upon mailing or e-mailing.
5. **Additional order(s) necessary to protect Petitioner from stalking:**

.

6. **Referral to Appropriate Services for Petitioner:**
Petitioner may contact the following services as needed:

SECTION IV. OTHER SPECIAL PROVISIONS

(This section to be used for inclusion of local provisions approved by the chief judge as provided in Florida Family Law Rule 12.610.)

SECTION V. DIRECTIONS TO LAW ENFORCEMENT OFFICER IN ENFORCING THIS INJUNCTION

(Unless ordered otherwise by the judge, all provisions in this injunction are considered mandatory provisions and should be interpreted as part of this injunction.)

1. The Sheriff of Sarasota County, or any other authorized law enforcement officer, is ordered to serve this temporary injunction upon Respondent as soon as possible after its issuance.
2. **This injunction is valid and enforceable in all counties of the State of Florida.** Violation of this injunction should be reported to the appropriate law enforcement agency. Law enforcement officers of the jurisdiction in which a violation of this injunction occurs shall enforce the provisions of this injunction and are authorized to arrest without a warrant pursuant to Section 901.15, Florida Statutes, for any violation of its provisions, which constitutes a criminal act under Section 784.0487, Florida Statutes.
3. **THIS INJUNCTION IS ENFORCEABLE IN ALL COUNTIES OF FLORIDA AND LAW ENFORCEMENT OFFICERS MAY EFFECT ARRESTS PURSUANT TO SECTION 901.15(6), FLORIDA STATUTES.** The arresting agent shall notify the State Attorney's Office immediately after arrest.
4. **Reporting alleged violations.** If Respondent violates the terms of this injunction and has not been arrested, Petitioner may contact the clerk of the circuit court of the county in which the violation is alleged to have occurred. The clerk shall assist Petitioner in preparing an affidavit in support of reporting the violation or direct Petitioner to the office operated by the court that has been designated by the chief judge of that circuit as the central intake point for violations of injunctions for protection where Petitioner can receive assistance in the preparation of the affidavit in support of the violation. The affidavit shall be immediately forwarded by the office assisting Petitioner to the state attorney of that circuit and to the judge designated by the chief judge as the recipient of affidavits of violations of an injunction. Procedures relating to reporting alleged violations are governed by section 784.0487, Florida Statutes.

DONE AND ORDERED in Sarasota County, Florida, on September 09, 2026.


09/09/2026 1:47 PM 2026 DR 004778 NC

e-Signed 9/9/2026 1:47 PM 2026 DR 004778 NC

CIRCUIT JUDGE
THOMAS KRUG

COPIES TO:

Sheriff of Sarasota County

Petitioner (or his or her attorney):

☐ by U.S. Mail

☐ by hand delivery

☒ by e-mail to a designated e-mail address

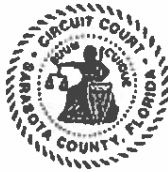
Respondent:

☒ forwarded to sheriff for service

☐ State Attorney's Office

☐ Other:

I CERTIFY the foregoing is a true copy of the original **Temporary Injunction for Protection Against Stalking** as it appears on file in the office of the Clerk of the Circuit Court of Sarasota County, Florida, and that I have furnished copies of this order as indicated above.



KAREN E. RUSHING, CLERK OF THE CIRCUIT COURT

K Legaspi

By:

Kimberly Legaspi

Deputy Clerk or Judicial Assistant

IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT,
IN AND FOR SARASOTA COUNTY, FLORIDA

Victoria Emma Shingleton
Petitioner,

Case No.: 2026 DR 4778 NC
Division: _____

and
Joshua Conner Moon
Respondent.

PETITION FOR INJUNCTION FOR PROTECTION AGAINST STALKING

I, {full legal name} Victoria Emma Shingleton, declare under penalties of perjury, that the following statements are true:

SECTION I. PETITIONER

(This section is about you. It must be completed; however, if you require that your address be confidential for safety reasons, you should complete and file a Request for Confidential Filing of Address, Florida Supreme Court Approved Family Law Form 12.980(h), and write "confidential" in the space provided on this form for your address and telephone number.)

1. Petitioner resides at the following address: {address, city, state, zip code} _____
CONFIDENTIAL - see Form 12.980(h)
{Indicate if applicable}
☐ Petitioner seeks an injunction for protection on behalf of a minor child. Petitioner is the parent or legal guardian of {full legal name} _____, a minor child who is living at home.
2. Petitioner's attorney's name, address, and telephone number is: _____
None (self-represented)
(If you do not have an attorney, write "none.")

SECTION II. RESPONDENT

(This section is about the person you want to be protected from. It must be completed.)

1. Respondent resides at the following address: {provide last known street address, city, state, and zip code}
Unknown; last known c/o Lolcow LLC, 8051 N. Tamiami Trail Ste. E6, Sarasota, FL 34243
2. Respondent's last known place of employment: Lolcow LLC d/b/a Kiwi Farms (lolcow.farm) - Respondent is owner/manager
Employment address: 8051 N. Tamiami Trail, Ste. E6, Sarasota, FL 34243
Working hours of Respondent: Unknown

3. Physical description of Respondent: Race: White (believed) Sex: Male ☒ Female ☐ Date of Birth: Unknown
 Height: Unknown Weight: Unknown Eye Color: Unknown Hair Color: Unknown
 Distinguishing marks and/or scars: Unknown
 Vehicle: (make/model) Unknown Color: Unknown Tag Number (if known) Unknown
4. Other names Respondent goes by (aliases or nicknames): "Null"; "Josh Moon"; "Joshua Moon"
5. Respondent's attorney's name, address, and telephone number is: Unknown.
 (If you do not know whether Respondent has an attorney, write "unknown." If Respondent does not have an attorney, write "none.")

SECTION III. CASE HISTORY AND REASON FOR SEEKING PETITION (This section must be completed.)

1. Has Petitioner ever received or tried to get an injunction for protection against stalking against Respondent in this or any other court?
☐ Yes ☒ No If yes, what happened in that case? {Include case number, if known} _____
2. Has Respondent ever received or tried to get an injunction for protection against stalking against Petitioner in this or any other court?
☐ Yes ☒ No If yes, what happened in that case? {Include case number, if known} _____
3. Describe any other court case that is either going on now or that happened in the past **between Petitioner and Respondent** {Include case number, if known}: None between Petitioner and Respondent See Affidavit, para 28.
4. Petitioner is a victim of stalking because Respondent has: {please mark all sections that apply}
- a. ☒ Committed stalking;
 - b. ☒ Previously threatened, harassed, stalked, cyberstalked, or physically abused the Petitioner;
 - c. ☒ Threatened to harm Petitioner or family members or individuals closely associated with Petitioner;
 - d. ☐ Intentionally injured or killed a family pet;
 - e. ☐ Used, or threatened to use, against Petitioner any weapons such as guns or knives;
 - f. ☐ A criminal history involving violence or the threat or violence, if known;
 - g. ☐ Another order of protection issued against him or her previously from another jurisdiction, if known;
 - h. ☐ Destroyed personal property, including, but not limited to, telephones or other communication equipment, clothing, or other items belonging to Petitioner.

5. Below is a description of the specific incidents of stalking or cyberstalking: *{for cyberstalking, please include a description of all evidence of contacts and/or threats made by Respondent in voice messages, texts, emails, or other electronic communication}*

On {dates} 12/2016 to present the following incidents of stalking occurred at the following locations: *{the locations may include, but need not be limited to, a home, school, or place of employment}*

Respondent owns and operates the website "Kiwi Farms" (lolcow.farm) through his Florida company, Lolcow LLC, Sarasota.

Dec. 2016 to Jan. 2026: 20+ threads devoted to tracking, degrading and harassing Petitioner by name; all remain online.

Doxxing: Petitioner's legal name, home address, e-mail, employer and Facebook profile published; covert street photo.

Post urging readers to "show up at her tattoo shop and scare the shit out of her" and to "take pics/video too."

Posters self-identify as "stalkers," monitor her social media and track her relocations; one awaited her death.

Sexualized, ableist and defamatory posts, including speculation that Petitioner would "fake a suicide attempt."

Actual notice and refusal: 2016 takedown demands; written cease-and-desist 8/29/2026. No response; no removal.

Full sworn facts, dates, quoted posts and URLs are in the attached Affidavit and Exhibit A, incorporated herein.

☒ Please indicate here if you are attaching additional pages to continue these facts.

6. **Additional Information**

☐ Respondent owns, has, and/or is known to have guns or other weapons.

Describe weapon(s) and where they may be located, if known: Unknown

SECTION IV. INJUNCTION *{This section must be completed.}*

1. Petitioner asks the Court to enter a **TEMPORARY INJUNCTION** for protection against stalking that will be in place from now until the scheduled hearing in this matter, which will immediately restrain Respondent from committing any acts of stalking, and which will provide any terms the Court deems necessary for the protection of a victim of stalking, including any injunctions or directives to law enforcement agencies.
2. Petitioner asks the Court to enter, after a hearing has been held on this petition, a **FINAL JUDGMENT** for protection against stalking prohibiting Respondent from committing any acts of stalking against Petitioner and:
 - a. prohibiting Respondent from going to or within 500 feet of any place Petitioner lives, or to any specified place regularly frequented by Petitioner and any named family members or individuals closely associated with Petitioner: Petitioner's residence, filed confidentially under Form 12.980(h).
 - b. prohibiting Respondent from going to or within 500 feet of Petitioner's place(s) of employment or the school that Petitioner attends; the address of Petitioner's place(s) of employment and/or school is: Confidential; see Form 12.980(h).
 - c. prohibiting Respondent from contacting Petitioner by telephone, mail, by e-mail, in writing, through another person, or in any other manner;
 - d. ordering Respondent that he or she shall not have in his or her care, custody, possession, or control any firearm or ammunition;
 - e. prohibiting Respondent from knowingly and intentionally going to or within 100 feet of Petitioner's motor vehicle, whether or not that vehicle is occupied;
3. Petitioner asks the Court to enter any other terms it deems necessary to protect Petitioner from stalking by Respondent.

I UNDERSTAND THAT BY FILING THIS PETITION, I AM ASKING THE COURT TO HOLD A HEARING ON THIS PETITION,

THAT BOTH THE RESPONDENT AND I WILL BE NOTIFIED OF THE HEARING, AND THAT I MUST APPEAR AT THE HEARING. I UNDERSTAND THAT IF EITHER RESPONDENT OR I FAIL TO APPEAR AT THE FINAL HEARING, WE WILL BE BOUND BY THE TERMS OF ANY INJUNCTION OR ORDER ISSUED AT THAT HEARING.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THAT THE FACTS STATED IN IT ARE TRUE. I UNDERSTAND THAT THE STATEMENTS MADE IN THIS PETITION ARE BEING MADE UNDER PENALTIES OF PERJURY, PUNISHABLE AS PROVIDED IN SECTION 92.525, FLORIDA STATUTES.

Dated: September 1, 2026



Signature of Petitioner

Printed Name: Victoria Emma Shingleton

{Do not write your address if you are filing or have filed a Request for Confidential Filing of Address, Form 12.980(h).}

Address: CONFIDENTIAL - see Form 12.980(h)

City, State, Zip: CONFIDENTIAL - see Form 12.980(h)

Telephone Number: CONFIDENTIAL - see Form 12.980(h)

Designated E-Mail Address(es): mvminksend@gmail.com

IF A NONLAWYER HELPED YOU FILL OUT THIS FORM, HE/SHE MUST FILL IN THE BLANKS BELOW:

{fill in all blanks} This form was prepared for the: {choose only one} ☐ Petitioner ☐ Respondent

This form was completed with the assistance of:

{name of individual} _____

{name of business or individual} _____

{address} _____

{city} _____, {state} _____, {telephone number} _____

{email address} _____

Exhibit 3

Contact Form Message
September 27, 2016



[Lolcow Email] LEO - criminal harassment, copyright violations

1 message

Lolcow Email Contact Form <welcome@lolcow.email>

Tue, Sep 27, 2016 at 2:12 AM

Reply-To: legal.report@outlook.com

To: josh@lolcow.email

This a notice to cease and desist and remove all content from this thread as there are laws protecting against cyber bullying, copyright, libel and also criminal harassment particularly in Canada where the victim resides.

You will have the authorities to deal with if it is not removed within 24 hours, and it will be your legal responsibility as you have been forewarned of the illegal activity on your server.

<https://lolcow.farm/snow/res/35202.html#176020>

Email sent from the Lolcow Email abuse contact form.

Exhibit 4

Cloudflare Notice of DMCA Complaint
December 27, 2016

[7f07422fb31d8217]: Cloudflare received a DMCA copyright infringement complaint regarding your site.

From CloudFlare <abuse@cloudflare.com>
To ichverbot@gmail.com
Date Tue, 27 Dec 2016 22:55:34 +0000
Subject [7f07422fb31d8217]: Cloudflare received a DMCA copyright infringement complaint regarding your site.

<20161227225532.9166FEB458BE6@smtpout1.cloudflare.com>

Cloudflare received a DMCA copyright infringement complaint regarding:

kiwifarms.net

Below is the complaint we received:

Reporter's Name: Victoria Shingleton
Copyright Holder's Name: victoria shingleton
Reporter's Email Address: mvminksend@hotmail.com
Reporter's Title: Miss
Reporter's Address: [REDACTED]
Reported URLs:
 <https://kiwifarms.net/threads/victoria-shingleton-victoria-bellamorte-miss-victoria-murder.26853/>
Original Work: Stolen from instagram and fb

<https://instagram.com/missvictoriamurder>
<https://www.facebook.com/VictoriaBellaMorteOfficial/>

(The link to the topic i sent, is using my copy written images i own soul rights to as i have photographers sign over all rights to the images or they were self shot, as you can see they are clearly used without my permission and this person has simply moved the harassment to a new venue.)

Hello!

>
> Kiwifarms.net has someone on it posting a topic about me who has been
> harassing me through lolcow.com. The attorney general of canada had
> to be involved to remove the content last time from their site as it
> is illegal and in both US and Canadian law...being part of it or
> aiding cyber bullying and online harassment is punishable by law...as
> well as my copywritten content is posted without my permission on the
> site...which can leave the host liable if it is not removed.
>
> I would ask that the content be removed..i would need to contact the host site
personally, i would rather go that route than have to getting the authorities involved
in the matter again.....this person has been
> stalking / harassing me for over a year and its getting out of hand. They started
the topic on Christmas eve they are that relentless.
>
> Thank you greatly
> -Victoria

We have provided the name of your hosting provider to the reporter. Additionally, we have forwarded this complaint to your hosting provider as well.

Regards,

Cloudflare Abuse

Re: [7f07422fb31d8217]: Cloudflare received a DMCA copyright infringement complaint regarding your site.

From Lorin O'Landry <legal@kiwifarms.net>
To mvminksend@hotmail.com
Date Tue, 27 Dec 2016 17:26:25 -0600
Subject Re: [7f07422fb31d8217]: Cloudflare received a DMCA copyright infringement complaint regarding your site.

<CAAggHqisxzkKnJ6fVHs_FDHHNWvpCcr5QH4Ok_v5Xn75Dbzh6w@mail.gmail.com>

Hello Victoria,

The works are used in the context of criticism and ridicule. This is covered by the First Amendment to the United States Constitution.

For more information, please see:

https://en.wikipedia.org/wiki/First_Amendment_to_the_United_States_Constitution

Happy New Year,

--

Lorin O'Landry

Legal Advisor

Lolcow LLC

p: +1 (757) 932-5494

w: kiwifarms.net e: legal@kiwifar.ms

Re: [7f07422fb31d8217]: Cloudflare received a DMCA copyright infringement complaint regarding your site.

From Lorin O'Landry <legal@kiwifarms.net>
To vee b m <mvminksend@hotmail.com>
Date Tue, 27 Dec 2016 18:07:12 -0600
Subject Re: [7f07422fb31d8217]: Cloudflare received a DMCA copyright infringement complaint regarding your site.

<CAAggHqgSx2oKPsmas31TeaFDmab6_JWYhNnhOajXD0QqXPpZ7mw@mail.gmail.com>

Extradition is only applicable in criminal court, not civil court. Copyright is a civil issue. In order to sue Lolcow LLC for the 0 dollars and 00 cents it's worth, you would need to find a lawyer and judge in the United States willing to hear it, you would need to swear yourself to American law, and you would need to base the accusations on American law. You cannot use American lawyers and American courts to sue American citizens for Canadian crimes, and you cannot use Canadian copyright law to extradite United States citizens.

If you need more help understanding basic law, I can provide legal consultation for a nominal fee.

Sincerely,

--

Lorin O'Landry

Legal Advisor

Lolcow LLC

p: +1 (757) 932-5494

w: kiwifarms.net e: legal@kiwifar.ms

Re: [7f07422fb31d8217]: Cloudflare received a DMCA copyright infringement complaint regarding your site.

From vee b m <mvminksend@hotmail.com>
To Lorin O'Landry <legal@kiwifarms.net>
Date Wed, 28 Dec 2016 00:14:05 +0000
Subject Re: [7f07422fb31d8217]: Cloudflare received a DMCA copyright infringement complaint regarding your site.

<YTOPR01MB0169F6F45301F468CD8A307FC9680@YTOPR01MB0169.CANPRD01.PROD.OUTLOOK.COM>

Perhaps you have trouble reading...it will be tried as a criminal offense, as criminal harassment and cyberbullying is considered criminal in both US and Canada... the copyright is a separate issue. I'm sure the Attorney General of Canada will know all about the proceedings for that. I do not require other representation other than her at this time.

Enjoy your day.

From: Lorin O'Landry <legal@kiwifarms.net>
Sent: December 27, 2016 7:07 PM
To: vee b m
Subject: Re: [7f07422fb31d8217]: Cloudflare received a DMCA copyright infringement complaint regarding your site.

Extradition is only applicable in criminal court, not civil court. Copyright is a civil issue. In order to sue Lolcow LLC for the 0 dollars and 00 cents it's worth, you would need to find a lawyer and judge in the United States willing to hear it, you would need to swear yourself to American law, and you would need to base the accusations on American law. You cannot use American lawyers and American courts to sue American citizens for Canadian crimes, and you cannot use Canadian copyright law to extradite United States citizens.

If you need more help understanding basic law, I can provide legal consultation for a nominal fee.

Sincerely,

--

Lorin O'Landry

Legal Advisor

Lolcow LLC

p: +1 (757) 932-5494

w: kiwifarms.net e: legal@kiwifarms.net

Kiwi Farms

kiwifarms.net

About Us Founded as the CWCKi Forums, and originally dedicated to Christian Weston Chandler, the Kiwi Farms is about eccentrics on the Internet.

Re: [7f07422fb31d8217]: Cloudflare received a DMCA copyright infringement complaint regarding your site.

From Lorin O'Landry <legal@kiwifarms.net>
To vee b m <mvminksend@hotmail.com>
Date Tue, 27 Dec 2016 19:32:41 -0600
Subject Re: [7f07422fb31d8217]: Cloudflare received a DMCA copyright infringement complaint regarding your site.

<CAAggHqg_bAWz4fgnQhKuwePxPC1q6ZVUQ2CSNta5KW+J8p2gDQ@mail.gmail.com>

'Cyberbullying' and 'bullying' laws vary from state to state and country to country, but the gist is the same where it exists. Bullying is somewhat strictly defined as a sort of harassment that only occurs towards students and faculty of the education sector by other members of the same facility. I can tell from looking at you that you're well over 18 years old and are not a student. So, unless the person who made that thread and left comments is a member of a school you work at, it isn't cyberbullying.

Laws on stalking and harassment are broader. They're a superset of bullying. If you wanted to press harassment charges, you'd have to press them against the individuals in the thread who left the comments that break the law. The Kiwi Farms is a *website*, not a person, and cannot break the law. Lolcow LLC owns that website, but indicates on the bottom of every page on the site that it does not own the content posted by users. This means that you'd have to identify individuals and prosecute them individually. Lolcow LLC is not required to obey Canadian court orders to hand over identifying information about users.

You cannot hold the forum or its container company liable for random people's posts. If that were possible, the Internet would not be able to exist.
You cannot, as a non-student and non-teacher, criminally accuse people of bullying.

There's so much more that's preposterous about your demands and worth going over, but since I'm giving you advice on how to better threaten the company I'm representing, this is all you get.

Next time you file legal complaints you should have a mentally capable parent or guardian assist you.

--

Lorin O'Landry

Legal Advisor

Lolcow LLC

p: +1 (757) 932-5494

w: kiwifarms.net e: legal@kiwifarms.net

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To vee b m <mvminksend@hotmail.com>
Date Tue, 27 Dec 2016 19:59:49 -0600
Subject Re: [7f07422fb31d8217]: Cloudflare received a DMCA copyright infringement complaint regarding your site.

<CAAggHqhQoN=J5aEv1HgrU92edx9hieGT=UOQ79MU46T+1g0fYA@mail.gmail.com>

The Kiwi Farms is not about you.

On Tue, Dec 27, 2016 at 7:46 PM, vee b m <mvminksend@hotmail.com> wrote:

"Creating websites about the victim that contain threatening or harassing messages"

"Attempting to destroy the victim's reputation by engaging in "cyber-smearing", i.e., sending or posting false or embarrassing intimate information about or, supposedly, on behalf of the victim. [\[62\]](#)

"Encouraging others to harass the victim. [\[6\]](#)"

1.6.1 Online Criminal Harassment, Cyberstalking and a Related Typology

"1.6.2 Online Bullying and Cyberbullying

Cyberbullying ""involves the use of information and communications technologies to support deliberate, repeated, and hostile behaviour by an individual or group, that is intended to harm others."" [\[73\]](#)

"

From: Lorin O'Landry <legal@kiwifarms.net>

Sent: December 27, 2016 8:32 PM

To: vee b m

Subject: Re: [7f07422fb31d8217]: Cloudflare received a DMCA copyright infringement complaint regarding your site.

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