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JUSTICE COURT, MISSOULA COUNTY, MONTANA

STACY LEAR,

Petitioner,

and

CARRIE ANN JAMROGOWICZ,

Respondent.

Dept. No. \_\_\_\_\_

Cause No. \_\_\_\_\_

VERIFIED PETITION FOR ORDER  
OF PROTECTION

STACY LEAR petitions the Court for an order of protection under

M.C.A. §§ 40-15-102(2)(a), 45-5-220(1)(b) and 45-8-213(4) based on the following verified allegations that Respondent CARRIE ANN JAMROGOWICZ (“Ms. Jamrogowicz”) purposely or knowingly caused Petitioner (“Ms. Lear”) substantial emotional distress or reasonable apprehension of bodily injury or death by repeatedly harassing, threatening, or intimidating Ms. Lear by following Ms. Lear and through electronic communication (as defined under M.C.A. § 45-8-213(4)).

#### VERIFIED ALLEGATIONS

1. Ms. Lear is a Missoula resident and is employed as a Detective with the Missoula City Police Department.

(1998 - DECEMBER 2000)

#### HISTORICAL BACKGROUND

2. In the mid-to-late 1990s, Ms. Lear was a member of a co-ed fraternity at North Carolina State University (“NCSU”). Ms. Lear subsequently moved to Leesburg, Virginia but remained in contact with other NCSU alumni, including William Jay Cuthrell (“Mr. Cuthrell”). Around 1998, Mr. Cuthrell met Respondent Ms.

Jamrogowicz online, and Ms. Jamrogowicz moved to Cary, North Carolina.

3. Mr. Cuthrell introduced Ms. Jamrogowicz to Ms. Lear and other alumni and asked that Ms. Jamrogowicz be welcomed into their social circle. At that time, their social circle maintained contact mainly by means of a social networking internet website called Livejournal (similar to Facebook).

4. There is no personal relationship or friendship between Ms. Lear and Ms. Jamrogowicz. While Ms. Lear interacted with Ms. Jamrogowicz on Livejournal and through chat programs at that time, Ms. Lear can only recall meeting Ms. Jamrogowicz in person on three occasions prior to 2005, and at no time has Ms. Lear ever spent one-on-one time with Ms. Jamrogowicz or engaged Ms. Jamrogowicz in anything other than casual conversation.

5. From 1999 to 2000, Ms. Jamrogowicz began exhibiting behavior disturbing to Ms. Lear. She began by imitating Mr. Cuthrell's close friend and member of the alumni group, Dr. Anne Lincoln ("Dr. Lincoln"). Ms. Jamrogowicz first cut and colored her hair

to precisely match Dr. Lincoln's hair. Ms. Jamrogowicz then began imitating Dr. Lincoln in other ways: Ms. Jamrogowicz imitated Dr. Lincoln's weightlifting hobby, and Ms. Jamrogowicz imitated Dr. Lincoln's interest in Dobermans by obtaining a Doberman dog. It was clear to Ms. Lear that Ms. Jamrogowicz was monitoring Dr. Lincoln's online communication and conspicuously imitating Dr. Lincoln in order to harass Dr. Lincoln and cause Dr. Lincoln to experience embarrassment and emotional distress.

6. Ms. Lear observed that Ms. Jamrogowicz became increasingly hostile toward Dr. Lincoln over time. On December 14, 2000, Dr. Lincoln was scheduled to fly cross-country. Ms. Jamrogowicz posted on a public forum that she hoped that Dr. Lincoln's plane would crash. Ms. Lear was not aware of any basis or reason which could explain or partially excuse Ms. Jamrogowicz' behavior.

7. On or about December 19, 2000, after reading the statement by Ms. Jamrogowicz, Ms. Lear communicated to Ms. Jamrogowicz electronically that she wished to sever all contact with

Ms. Jamrogowicz.

8. Ms. Lear is aware that Dr. Lincoln later obtained a draft order of protection and warned Ms. Jamrogowicz if she did not cease harassment of her, then she would have it served. Ms. Lear understands from information she received from Dr. Lincoln that Ms. Jamrogowicz stopped harassing Dr. Lincoln after receiving notice of Dr. Lincoln's intention to obtain an order of protection.

(December 2000 - March 2005)

EVENTS FOLLOWING FORMAL SEVERING OF CONTACT

9. In 2001, Ms. Lear learned of another acquaintance victimized by Ms. Jamrogowicz' online activities. Ms. Jamrogowicz stole a web site design belonging to Ms. Penny Gray Launey ("Ms. Launey"), who made a complaint. Ms. Jamrogowicz retaliated against Ms. Launey by using her employer's computer to "port scan" networks related to Ms. Launey. Port scanning is a method used by computer hackers to identify systems which are vulnerable to electronic attacks. Ms. Lear later learned Ms. Jamrogowicz had been terminated by her employer after being caught in the act of port

scanning and then accessing Ms. Launey's private electronic communications. Ms. Lear knew of these events through casual communication with mutual acquaintances.

10. On January 31st, 2001, Ms. Jamrogowicz posted online that she wished Ms. Lear "would go away" by unspecified means. Ms. Lear learned of this through a mutual acquaintance who was concerned for Ms. Lear's safety given Ms. Jamrogowicz' history to that point.

11. On February 28th, 2001, there was an earthquake in Seattle, which is where both Ms. Launey and Dr. Lincoln lived at that time. Ms. Jamrogowicz posted on a public forum that the earthquake was "karma."

12. Also in 2001, Ms. Jamrogowicz began harassing a third individual named Ms. Alaina Hardie ("Ms. Hardie"). As with the other two individuals, Ms. Jamrogowicz began to conspicuously imitate Ms. Hardie online using information gleaned from monitoring her electronic communications: Ms. Jamrogowicz closely imitated Ms. Hardie's political, music, obscure literary interests, and acquired

a Maltese dog based on Ms. Hardie's interest in the breed. Ms. Jamrogowicz was eventually confronted by Ms. Hardie who demanded that Ms. Jamrogowicz stop monitoring her online activities and targeting Ms. Hardie. After being confronted by Ms. Hardie, Ms. Jamrogowicz then stopped harassing her.

13. On March 2nd, 2001, Ms. Jamrogowicz reiterated in a public forum that her posts about the plane crash and earthquake were justified, and also counted "74 days" since Ms. Lear ceased contact with her, indicating that Ms. Jamrogowicz was aware that Ms. Lear did not want to have contact with Ms. Jamrogowicz and also placed significance on Ms. Lear's refusal to communicate with her.

14. On April 3rd, 2004, Ms. Lear moved into her current home in Missoula, Montana from Leesburg, Virginia.

(2005)

DISCOVERY OF MS. JAMROGOWICZ IN MONTANA

AND LETTER OF NO CONTACT

15. On March 16th, 2005, Ms. Jamrogowicz showed up at a firearms class in Billings, Montana which Ms. Lear had posted on

her public blog that she would be attending.

16. Ms. Lear was startled to find Ms. Jamrogowicz at the class. During the class, Ms. Lear learned that Ms. Jamrogowicz was now living in Montana and involved in competitive shooting and that Ms. Jamrogowicz planned to travel to Missoula regularly to attend shooting matches at the shooting club in which Ms. Lear was a member.

17. At that time, March, 2005, Ms. Lear had not yet realized that she had been targeted by Ms. Jamrogowicz in the same manner as the other three individuals. Ms. Lear soon discovered that Ms. Jamrogowicz had been using information gathered from public and private electronic communications of Ms. Lear and then publishing that information on public social networking sites frequented by Ms. Lear and acquaintances of Ms. Lear in order to cause Ms. Lear to experience substantial emotional distress.

18. Ms. Lear made this discovery after Ms. Jamrogowicz electronically invited Ms. Lear to view her posts on the social networking group by adding Ms. Lear to an access list. When Ms.



Lear read the posts, she realized that Ms. Jamrogowicz had deliberately published information about Ms. Lear which was based on close monitoring by Ms. Jamrogowicz of Ms. Lear's public and private electronic communications. These actions by Ms. Jamrogowicz were knowing or intentional and caused Ms. Lear to experience substantial emotional distress.

19. When Ms. Lear read Ms. Jamrogowicz' published posts, she was shocked to simultaneously learn the following:

a) that Ms. Jamrogowicz had traded her passenger car for a pickup truck similar to Ms. Lear's pickup, and that Ms. Jamrogowicz decorated the truck with the same type of decals that were on Ms. Lear's truck.

b) that Ms. Jamrogowicz had created a geocaching.com account less than 24 hours after Ms. Lear created her account and had then traveled approximately 300 miles from her home in Cary, North Carolina to Ms. Lear's hometown of Leesburg, Virginia and visited the same geocache where Ms. Lear deposited a souvenir. There would have been hundreds of geocaches in that area at that

time. The geocaching web site requires that all member profiles be viewable to other members, and profiles list the locations of each player's souvenirs. Ms. Lear's profile was under a pseudonym. Ms. Lear's souvenir disappeared around the same time as Ms. Jamrogowicz logged her visit. The rules of the geocaching game dictate players are not to remove and keep souvenirs of that type.

c) that Ms. Jamrogowicz had copied Ms. Lear's hairstyles and clothing items.

d) that Ms. Jamrogowicz had enrolled at North Carolina State University, taken the same courses Ms. Lear took to finish her degree, and then changed her major to the same degree field in which Ms. Lear obtained her degree.

e) that Ms. Jamrogowicz had moved to Montana only six months after Ms. Lear had moved to Montana. To Ms. Lear's knowledge, Ms. Jamrogowicz had no family, work or educational ties to Montana.

20. Based on the foregoing, Ms. Lear's prior notice to Ms. Jamrogowicz that Ms. Lear did not want any contact with Ms.

Jamrogowicz, (¶¶ 7, 10, 13) and Ms. Jamrogowicz's pattern of past stalking conduct (¶¶ 6, 8, 12) using sophisticated “port scanning” methods to monitor electronic communications (¶ 9), Ms. Lear believed that Ms. Jamrogowicz was intentionally or knowingly monitoring Ms. Lear's public and/or private electronic communications for the purpose of publishing personal details about Ms. Lear's life to public sites and causing Ms. Lear to experience substantial emotional distress.

21. On April 16th, 2005, Ms. Lear tested with and was subsequently hired by the Missoula City Police Department. Because Ms. Lear now knew the extreme degree to which Ms. Jamrogowicz was monitoring her electronically, Ms. Lear did not discuss this on any public forum until she had already completed the job application.

22. On June 20, 2005, Ms. Jamrogowicz intentionally or knowingly shared to a social network accessible to Ms. Lear that Ms. Jamrogowicz was now testing for a job as a police officer. As a result of the post by Ms. Jamrogowicz, Ms. Lear experienced substantial

emotional distress from her reasonable belief that Ms. Jamrogowicz had used unauthorized access to Ms. Lear's private communications to electronically stalk Ms. Lear as Ms. Jamrogowicz had electronically stalked the other three individuals known to Ms. Lear (¶¶ 5, 6, 8, 9 and 12).

23. On or about March 11, 2006, Ms. Lear traveled to the only geocache site owned by Ms. Lear and located 6 miles from Ms. Lear's home for the purpose of replacing the logbook in the geocache site. Inside the geocache site, which was one of over two thousand geocaches in Missoula, Ms. Lear discovered a handwritten and dated log entry by Ms. Jamrogowicz which indicated that Ms. Jamrogowicz had knowingly or intentionally followed Ms. Lear to the geocache site and which caused Ms. Lear to experience substantial emotional distress and fear.

24. On May 11th, 2006, under M.C.A. § 45-5-220(6), Ms. Lear gave Ms. Jamrogowicz an additional written notice that she did not want to be contacted or followed by Ms. Jamrogowicz by sending Ms. Jamrogowicz an electronic mail requesting that Ms. Jamrogowicz

stop following and electronically monitoring and harassing Ms. Lear and also informing Ms. Jamrogowicz that her actions were causing Ms. Lear to suffer emotional distress.

25. After receipt of Ms. Lear's email, Ms. Jamrogowicz relocated from Bozeman to an apartment in Missoula located 1.03 miles from Ms. Lear's house.

(JUNE 2006 - PRESENT)

EVENTS FOLLOWING 2006, M.C.A. § 45-5-220(6) WRITTEN NOTICE

26. Ms. Jamrogowicz continued to follow Ms. Lear and monitor Ms. Lear's private electronic communications despite receiving actual notice from Ms. Lear that Ms. Lear did not want to be contacted or followed by Ms. Jamrogowicz.

27. As a result of the substantial emotional distress Ms. Lear experienced from Ms. Jamrogowicz' actions, Ms. Lear has deleted or stopped using many online social networking profiles, taken down websites, and asked her mutual acquaintances not to share any information about her with Ms. Jamrogowicz. Ms. Lear frequently changes her passwords and advises her friends to do the

same. Despite Ms. Lear's efforts, Ms. Jamrogowicz has continued by unknown means to monitor Ms. Lear's personal information online and to use that information to intentionally or knowingly cause substantial emotional distress to Ms. Lear.

28. Ms. Lear quit shooting competitively because Ms. Lear did not feel safe being at the shooting range with Ms. Jamrogowicz. That summer Ms. Lear had placed second in her class/division at the regional championships, and Ms. Lear experienced substantial emotional distress over her decision to give up the sport.

29. As a result of the substantial emotional distress caused by Ms. Jamrogowicz' intentional acts, Ms. Lear developed insomnia and lack of appetite. Ms. Lear sought and received clinical treatment from a licensed therapist for the substantial emotional distress she suffered as a result of Ms. Jamrogowicz' intentional actions. Ms. Lear incurred significant expense for this therapy.

30. On February 14, 2010, Ms. Lear filed a police report with the Missoula Police Department (case no. P100214-024). Sgt. Bob Bouchee was assigned to investigate the case. Ms. Lear

informed Sgt. Bouchee of the following instances of stalking conduct by Ms. Jamrogowicz:

a) In June, 2006, Ms. Jamrogowicz intentionally or knowingly caused Ms. Lear to suffer substantial emotional distress by following Ms. Lear to Oregon where Ms. Lear was competing in a regional shooting competition.

b) In July, 2006, Ms. Jamrogowicz intentionally or knowingly caused Ms. Lear to suffer substantial emotional distress by engaging the same shooting instructor employed by Ms. Lear. Ms. Lear learned of this through communication with the instructor.

c) Beginning on or around July, 2006, Ms. Jamrogowicz intentionally or knowingly caused Ms. Lear to suffer substantial emotional distress by copying and publishing items from Ms. Lear's amazon.com wishlist which existed only under a pseudonym name. Ms. Lear learned of this while compiling information for her police report.

d) In August, 2007, Ms. Jamrogowicz intentionally or knowingly caused Ms. Lear to suffer substantial emotional distress

by gaining access to Ms. Lear's online wedding registry by unknown means before it was made public and publicly identifying herself as a purchaser of nearly \$400.00 in items from the registry. Ms. Lear learned of this because the Amazon.com wedding registry maintains a list of purchasers for the purpose of sending Thank You notes, which Ms. Lear regularly checked after she notified friends and family of the registry. Ms. Lear was also afraid Ms. Jamrogowiz would attempt to disrupt her wedding and notified law enforcement.

e) On May 23rd, 2008, Ms. Jamrogowicz intentionally or knowingly caused Ms. Lear to suffer substantial emotional distress by copying and publishing a bookmark from an obscure vendor used by Ms. Lear to purchase lingerie for her honeymoon. Ms. Lear does not know what means were employed by Ms. Jamrogowicz to discover Ms. Lear's purchase from the lingerie vendor. Ms. Lear learned of this because she participated in a bookmarking web site, delicious.com, which would notify users when other users had bookmarked the same links. Ms. Lear's account existed under a pseudonym. Ms. Jamrogowicz would have known the site would



notify Ms. Lear she was copying those links.

f) In June, 2008, Ms. Jamrogowicz intentionally or knowingly caused Ms. Lear to suffer substantial emotional distress by publishing links to German Shepherd breeders which Ms. Lear had browsed online. Ms. Lear does not know what means were employed by Ms. Jamrogowicz to learn that Ms. Lear had browsed the German Shepherd breeder links. Ms. Lear had bookmarked those sites under the same delicious.com web site under a pseudonym. Ms. Lear also learned from one breeder who participated on the Livejournal site that Ms. Jamrogowicz had invited that breeder to access and read Ms. Jamrogowicz' posts on the site, for the purpose of causing substantial emotional distress to Ms. Lear.

g) In June, 2008, Ms. Jamrogowicz intentionally or knowingly caused Ms. Lear to suffer substantial emotional distress by publishing her decision to join a "fitness challenge" which Ms. Lear had joined. Ms. Lear does not know what means were employed by Ms. Jamrogowicz to learn that Ms. Lear had joined the

fitness challenge. The challenge was administered online by a friend of Ms. Lear's and Ms. Jamrogowicz would have known Ms. Lear would learn Ms. Jamrogowicz had joined from that friend, and that it would cause Ms. Lear substantial emotional distress.

h) On October 21st, 2009, Ms. Jamrogowicz intentionally or knowingly caused Ms. Lear to suffer substantial emotional distress by obtaining access to a flickr.com account maintained by Ms. Lear under a pseudonym and gathering information about a work injury suffered by Ms. Lear.

i) On or about October, 2009, Ms. Jamrogowicz intentionally or knowingly caused Ms. Lear to suffer substantial emotional distress by following Ms. Lear to her physical therapist's office and pretending to seek treatment there though Ms. Jamrogowicz was not actually injured. Ms. Lear learned about this when her physical therapist told her a woman who looked like Ms. Lear with similar hobbies and law enforcement interests had come in for similar injury treatment to Ms. Lear. Ms. Jamrogowicz purposefully mentioned her hobbies and law enforcement interests

to that physical therapist in hopes she would relay that information to Ms. Lear to cause Ms. Lear substantial emotional distress.

j) On December 13th, 2009, Ms. Jamrogowicz intentionally or knowingly caused Ms. Lear to suffer substantial emotional distress by posting to her amazon.com wishlist a “wish” for a unique set of trekking poles (with a comment that her physical therapist had recommended them) which were used by Ms. Lear under supervision of her physical therapist. Ms. Lear learned of this while compiling information for her police report and believes that Ms. Jamrogowicz learned that Ms. Lear was using the trekking poles as part of her treatment by following and observing Ms. Lear.

31. For a period of time, it appeared that Ms. Jamrogowicz may cease stalking activity of Ms. Lear and that Ms. Jamrogowicz may relocate from Montana to another state. Based on consultation Sgt. Bouchee, Ms. Lear consented to assign her case to inactive status and to otherwise attempt to further restrict her online presence and other activities. Ms. Lear also based her decision, in part, on Sgt. Bouchee's consultation with a mental health

professional who advised that Ms. Jamrogowicz could become violent if confronted about her activities.

32. After a brief period of time, Ms. Jamrogowicz resumed stalking Ms. Lear by accessing her personal electronic communications and publishing private information about Ms. Lear in a manner calculated to cause Ms. Lear to suffer substantial emotional distress. Ms. Jamrogowicz also escalated her stalking activity by intentionally or knowingly monitoring and following Ms. Lear to physical locations in Missoula which caused Ms. Lear to suffer substantial emotional distress.

### JULY 2011

#### RE-OPENING OF POLICE INVESTIGATION

33. On July 1st, 2011, Ms. Jamrogowicz intentionally or knowingly caused Ms. Lear to suffer substantial emotional distress by investigating membership at a "Crossfit" gym attended by Ms. Lear over a period of years even though there was another, less expensive "Crossfit" gym located 1.1 miles closer to Ms. Jamrogowicz' home. Ms. Lear stopped attending classes at the gym

(where she had trained since 2007) in order to avoid Ms. Jamrogowicz.

34. On or about July, 2011, Ms. Lear requested that law enforcement re-open her case for investigation. Sgt. Travis Welsh of the Missoula Police Department requested Ms. Lear do online research for public information about Ms. Jamrogowicz and create a document containing screenshots to support Ms. Lear's allegations. During this research Ms. Lear learned of the following additional incidents of stalking conduct by Ms. Jamrogowicz:

a) On July 10, 2011, Ms. Jamrogowicz intentionally or knowingly caused Ms. Lear to suffer substantial emotional distress by posting a "wish" on her amazon.com wish list for the same type of shoes worn by Ms. Lear in a photo taken when Ms. Lear was participating in a marathon. The photo was posted to an account not accessible to Ms. Jamrogowicz.

b) On July 16, 2011, Ms. Jamrogowicz intentionally or knowingly caused Ms. Lear to suffer substantial emotional distress by reviewing a hair coloring product on Target.com which was the

same color as Ms. Lear's hair appeared in a photo of Ms. Lear. The photo was posted to an account not accessible to Ms. Jamrogowicz.

c) Ms. Jamrogowicz intentionally or knowingly caused Ms. Lear to suffer substantial emotional distress by creating a profile for Ms. Jamrogowicz on officer.com only four days after Ms. Lear tested for the Missoula Police Department for the purpose of gathering personal information about Ms. Lear to further Ms. Jamrogowicz's scheme of causing Ms. Lear to suffer substantial emotional distress.

d) Ms. Jamrogowicz intentionally or knowingly caused Ms. Lear to suffer substantial emotional distress by obtaining a post office box at the same post office where Ms. Lear receives her mail even though there is a post office 2.5 miles closer to Ms. Jamrogowicz's home. Ms. Lear learned of Ms. Jamrogowicz's actions when a mutual acquaintance who knows Ms. Lear's mailbox number is 998 saw Ms. Jamrogowicz opening mailbox number 1598 near Ms. Lear's mailbox.

e) On October 31st, 2011, Ms. Jamrogowicz intentionally or knowingly caused Ms. Lear to suffer substantial emotional

distress by gaining access to a private Facebook communication between Ms. Lear and a friend in Portland opening a bakery and then posting to the friend's page in a manner calculated to disclose to Ms. Lear that Ms. Jamrogowicz had gained unauthorized access to her private electronic communications.

35. On November 7th, 2011, Ms. Lear re-entered counseling/therapy with Dr. James Wemple. Ms. Lear selected Dr. Wemple because Ms. Lear learned he had experience counseling victims of stalking. Ms. Lear remains in therapy to date.

36. Ms. Lear has been a police officer since August, 2006 and a detective since January, 2010. During that time Ms. Lear has received over 400 hours of training, not including an additional twelve weeks of training at the Montana Law Enforcement Academy. Ms. Lear has received training on personality disorders and mental illness and has had direct experiences with many people who have mental illnesses. Ms. Lear has also done research on the profiles and mindsets of stalkers.

37. Based on her training and experience and her

consultation with other professionals, Ms. Lear strongly suspects that Ms. Jamrogowicz has a personality disorder and is mentally ill. Based on Ms. Jamrogowicz' apparent mental illness, the escalation in the severity of her conduct over time, and her access to and proficiency with firearms, Ms. Lear believes that Ms. Jamrogowicz poses an imminent danger to Ms. Lear particularly if Ms. Jamrogowicz is confronted about her actions.

38. In over five years as a police officer, Ms. Lear has encountered many dangerous people and situations. However, nothing has terrified Ms. Lear as much as Ms. Jamrogowicz' stalking behaviors. Ms. Lear finds herself planning self-defense maneuvers and watching out for Ms. Jamrogowicz near Ms. Lear's house, workplace and vehicle. Ms. Lear is constantly fearful that Ms. Jamrogowicz will show up at restaurants or stores or other locations Ms. Lear frequents. Ms. Lear has also notified other police officers of the situation as a cautionary measure for her safety and that of her co-workers.

39. Ms. Lear has also given up hobbies and ties with



mutual acquaintances because Ms. Lear did not trust them not to share personal information with Ms. Jamrogowicz. Ms. Lear deeply grieves these losses. Ms. Lear was advised by Dr. Wemple that she has become “invisible” and given up control over her life through her efforts to guard against Ms. Jamrogowicz.

40. Ms. Jamrogowicz has a concealed weapons permit and is heavily armed. She is a B-class rated competitive shooter, which means she is in the top 60% to 75% of all competitive shooters. Ms. Jamrogowicz has an eleven-year history of stalking other women, specifically at least three women from 2000 to 2002, and has been stalking Ms. Lear since 2002 in an increasingly escalating fashion.

41. In all other cases known to Ms. Lear, Ms. Jamrogowicz ceased her unwanted behavior when confronted. However, when Ms. Lear confronted Ms. Jamrogowicz in 2006, Ms. Jamrogowicz responded by moving 1.03 miles from Ms. Lear's house and joining Ms. Lear's shooting club.

42. Ms. Lear is afraid that she is in danger of harm if the court does not immediately issue an order of protection to restrain

Ms. Jamrogowicz from stalking Ms. Lear.

WHEREFORE, Petitioner requests under M.C.A. § 40-15-201(2) that, upon review of this petition, the Court find that the Petitioner is in danger of harm if the Court does not act immediately and, accordingly, that the Court:

43. issue a temporary order of protection granting Petitioner appropriate relief as follows:

a) prohibiting the Respondent from threatening to commit or committing acts of violence against the Petitioner; and

b) prohibiting the Respondent from harassing, annoying, disturbing the peace of, telephoning, contacting, or otherwise communicating in person or by means of any electronic device or computer network, directly or indirectly, with the Petitioner; and

c) directing the Respondent to at all times remain a minimum of 1,500 feet away from the Petitioner, Petitioner's residence, Petitioner's place of employment; and

44. directing other relief necessary to provide for the safety and welfare of Petitioner including:

a) prohibiting Respondent from using the internet to stalk, harass, intimidate, embarrass or communicate, directly or indirectly, with Petitioner by electronic means of monitoring Petitioner's private user accounts, passwords and/or content published to internet sites which is not intended for viewing by Respondent.

b) requiring Respondent to immediately cease and desist from posting content gleaned from Petitioner's electronic communications or by other means to public internet sites and/or social networks and to otherwise cease and desist from posting any content to the internet in a manner calculated to harass, intimidate, or embarrass the Petitioner or which otherwise references the Petitioner or includes content indicating that Respondent has monitored Petitioner or Petitioner's electronic communications without Petitioner's express consent.

45. That such temporary order of protection issue immediately, without prior notice to Respondent, for up to 20 days, based upon the Court's finding that harm may result to the Petitioner if an order is not issued before the 20-day period for

responding has elapsed.

DATED this \_\_\_\_ day of December, 2011.

MONTE JEWELL, PC

By: \_\_\_\_\_  
Monte Jewell  
Attorney for Petitioner

VERIFICATION

Petitioner, STACY LEAR, affirms that Petitioner has read the foregoing *Verified Petition for Order of Protection*. Under penalty of perjury, Petitioner certifies that all of Petitioner's statements contained in the foregoing *Verified Petition for Order of Protection* are true, accurate and complete to the best of Petitioner's actual knowledge and that, as to any statements for which Petitioner lacks actual knowledge, Petitioner believes those statements to be true, accurate and complete based on information and belief.

DATED this \_\_\_\_ day of December, 2011.

\_\_\_\_\_  
STACY LEAR

SUBSCRIBED AND AFFIRMED on this \_\_\_\_ day of December, 2011.

(seal) \_\_\_\_\_  
Notary Public for the State of Montana  
Printed Name: \_\_\_\_\_  
Residing at: \_\_\_\_\_ Missoula, MT  
My Commission Expires: \_\_\_\_\_