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UNITED STATES DISTRICT COURT
FOR THE
NORTHERN DISTRICT OF FLORIDA

THOMAS NORMAN OLSEN,

Plaintiff,

vs.

TIMOTHY CHARLES HOLMSETH,

Defendant

Case No.: 3:17cv790-MCR-EMT

COMPLAINT AND MOTION FOR RELIEF

JURY TRIAL DEMANDED

NOW COMES the Plaintiff Thomas Norman Olsen, pursuant to the Florida Rules of Civil Procedure and the Federal Rules of Civil Procedure and other statutes and laws of the state of Florida, complaining of the Defendant, Timothy Charles Holmseth, and states as follows:

ALLEGATIONS COMMON TO ALL COUNTS

Jurisdiction and Venue

1. Personal Jurisdiction is proper in accordance with Florida General Statute §48.193(6)(a) as the injuries and actions alleged herein occurred within the state of Florida.
2. Personal Jurisdiction is proper in accordance with Florida General Statute §48.193(9)(2) as the Defendant has been involved in substantial activity within the state of Florida.
3. Venue is proper in the Northern District of Florida because the injuries and actions alleged occurred within Santa Rosa County, Florida.

COMPLAINT AND MOTION FOR RELIEF JURY TRIAL DEMANDED - 1

Parties

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4. The Plaintiff, herein known as **Mr. Olsen**, is a current resident of Santa Rosa County, Florida and was living in Santa Rosa County, Florida at the time the actions alleged occurred. Mr. Olsen has an active protective injunction against Defendant filed and ordered in the Circuit Court of the First Judicial Circuit, Santa Rosa County, Florida (Case #17001251DRMXAX). Mr. Olsen has never met Defendant. Mr. Olsen has never had any personal correspondence with Defendant. Defendant has relentlessly attacked Mr. Olsen for over 2 years due to Mr. Olsen's association with Kim Picazio, Mr. Olsen's personal attorney on other matters. Kim Picazio is a licensed Florida attorney living and working in Fort Lauderdale, Florida. The protective injunction filed by Mr. Olsen has proven ineffective. Defendant continues to write about Mr. Olsen on his various websites (haleighcummingsdotme.wordpress.com & writeintoaction.com) and continues to file frivolous documents in numerous courts, including the Northern District of Florida (Case #3:17cv667-MCR-CJK), which was dismissed outright by United States Magistrate Judge Charles J. Kahn, Jr. Although Defendant redacts Mr. Olsen's name in his website postings after the protective injunction was granted, Defendant provides clues as to who he is talking about. Kim Picazio, Mr. Olsen's attorney in other matters, has an active protective injunction granted on 19 September 2011 in Broward County, Florida (Case #DVCE11005919), in which Defendant violated twice and was subsequently arrested and prosecuted.
5. The Defendant, herein known as **Mr. Holmseth**, is a current resident of Polk County, Minnesota and was living in Polk County, Minnesota at the time the actions alleged occurred. Mr. Holmseth has an extensive criminal background and three (3) active protective injunctions against him out of the state of Florida. Mr. Holmseth has relentlessly blogged and written about missing children throughout the years, to the point of obsession. Mr. Holmseth has written about missing children Haleigh Cummings, Caylee Anthony, and murder victim Jon Benet Ramsey. Mr. Holmseth has an autopsy photograph of Jon Benet Ramsey's dead body on the front page of his website, writeintoaction.com. Mr. Holmseth has blogged and written extensively throughout the years about what he believes is an underground shadow government coverup. Mr. Holmseth has accused this "shadow government" of being involved in kidnappings, rapes, sales, and murders of children nationwide. Mr. Holmseth has accused numerous FBI Agents, CIA Agents, Minnesota and Florida law enforcement, Florida Governor Rick Scott, New Jersey Governor Chris Christie, Kim Picazio (Mr. Olsen's attorney), Levi Page (journalist and friend of Mr. Olsen), William Murtaugh (friend of Mr. Olsen), Mr. Olsen, and dozens more federal and state employees and politicians along with private citizens of being involved in this massive government conspiracy and coverup. Mr. Holmseth has yet to provide a shred of proof relating to any of his accusations to this date.

Factual Background

6. Mr. Olsen was born on 3 January 1992 and is presently 25 years of age and is a current citizen of the United States of America.
7. Mr. Holmseth was born on 17 June 1968 and is presently 49 years of age and is a current citizen of the United States of America.
8. Mr. Holmseth claims that he is an award winning investigative journalist. The award he is referring to was given to an entire team of journalists, not just Mr. Holmseth as an individual. Mr. Holmseth was subsequently fired from his journalist job at a local newspaper and blacklisted in the field of journalism due to plagiarism he committed in the series of articles behind that award.
9. Mr. Holmseth was convicted of DWI, a gross misdemeanor, in Freeborn County, Minnesota on 2 May 1990 (Case #24-K3-90-000394).
10. Mr. Holmseth was convicted of DUI, a gross misdemeanor, in Faribault County, Minnesota on 25 June 1990 (Case #22-KX-90-000245).
11. Mr. Holmseth was convicted of Trespassing, a felony, in Renville County, Minnesota on 17 October 1990 (Case #65-KX-90-000546).
12. Mr. Holmseth was convicted of Alcohol Test Refusal, Theft, and DWI, all felonies, in Polk County, Minnesota on 7 November 1995 (Case #60-K2-95-001777).
13. Mr. Holmseth was convicted of Operating an Unregistered Vehicle on Public Streets in Mower County, Minnesota on 26 October 2006 (Case #50-VB-06-2315).
14. Mr. Holmseth was convicted of Failure to Display Current Registration/Expired Plates in Polk County, Minnesota on 18 September 2008 (Case #60-VB-08-1685).
15. Mr. Holmseth was convicted of Not Wearing a Seatbelt in Polk County, Minnesota on 6 September 2013 (Case #60-VB-13-2257).
16. Mr. Holmseth was deemed Chemically Dependent on 10 January 1996 (Case #57-P7-96-000017).
17. Mr. Holmseth lost custody of his minor son, Hoff Holmseth, due to his obsession with these missing children cases.
18. Mr. Holmseth filed a civil lawsuit against City of Grand Forks, University of North Dakota, State of North Dakota, County of Grand Forks, and Altru Health Systems on 25 July 2016 in the United States District Court of Minnesota (Case #0:16-cv-02496-JRT-LIB). This civil lawsuit was dismissed on 26 August 2016.
19. Mr. Holmseth filed a civil lawsuit against City of Grand Forks, Grand Forks Police Department, University of North Dakota, University of North Dakota Police Department, State of North Dakota, North Dakota Highway Patrol, County of Grand Forks, Grand Forks County Sheriff's Office, Grand Forks County PSAP, Grand Forks States Attorney, Altru Health Systems, and United States Customs and Border Protection on 18 August 2016 in the United

1 States District Court for the Eastern District of North Dakota (Case #3:16-cv-00303-ARS). This civil lawsuit was
2 dismissed on 30 September 2016.

3 20. Mr. Holmseth filed a civil lawsuit against City of East Grand Forks, East Grand Forks City Attorney Ronald Galstad,
4 Polk County Sheriff Barb Erdman, Director of Economic Development and Housing Authority James Richter, East
5 Grand Forks Police Chief Michael Hedlund, East Grand Forks City Administrator David Murphy, East Grand Forks
6 Lieutenant Detective Rodney Hajicek, East Grand Forks Police Officer Aeisso Schrage, Public Defender Michael
7 Lacoursiere, John Doe, Grand Forks National Weather Service Administrative Assistant Jeanette Ringuette, and Polk
8 County Sheriff Deputy Michael Norland on 22 July 2014 in the United States District Court of Minnesota (Case
9 #0:14-cv-02970-DWF-LIB). This civil lawsuit was dismissed on 23 July 2015.

10 21. Mr. Olsen filed a petition for a protective injunction against Mr. Holmseth on 14 August 2017 in the Circuit Court of
11 the First Judicial Circuit in Santa Rosa County, Florida (Case #17001251DRMXAX). There was a temporary
12 protective injunction ordered on 14 August 2017 pending a formal hearing, which was scheduled for 23 August 2017.
13 Mr. Holmseth was served with this order on 18 August 2017. The permanent protective injunction was granted on 6
14 September 2017 and is until further ordered. Mr. Holmseth violated the temporary order on 5 September 2017 by
15 blogging about Mr. Olsen and mentioning Mr. Olsen numerous times on Mr. Holmseth's website.

16 22. Kim Picazio, attorney for Mr. Olsen on other matters, filed a petition for a protective injunction against Mr. Holmseth
17 on 8 September 2011 in the Circuit Court of the Seventeenth Judicial Circuit in Broward County, Florida (Case
18 #DVCE11005919). This protective injunction was granted on 19 September 2011 and is until further ordered. A Writ
19 of Bodily Attachment was ordered against Mr. Holmseth for violation of this injunction on 28 October 2011. Mr.
20 Holmseth was arrested and then convicted the first time on 22 November 2011 and then again on 29 October 2012 in
21 Minnesota (Case #60-CR-11-2640)

22 23. Susan Renee Curry filed a petition for a protective injunction against Mr. Holmseth on 12 August 2011 in the Circuit
23 Court of the Seventh Judicial Circuit in Putnam County, Florida (Case #11.1230-FD). This protective injunction was
24 granted on 18 August 2011 and is until further ordered.

25 24. On 17 August 2015, Mr. Holmseth published on his websites (haleighcummingsdotme.wordpress.com &
26 writeintoaction.com) a blog post titled "'Anonymous' Video Producer Identified as Felony Defendant Thomas
Norman Olsen – Reported to States Attorney in Florida." In this posting, Mr. Holmseth makes false claims
against Mr. Olsen stating in part that Mr. Olsen created a video and posted it to Youtube "threatening Mr. Holmseth
and his minor children." This is simply not true. Mr. Olsen has never owned a Youtube account and has never posted
a video on Youtube. The first paragraph of this posting states as follows, "Thomas Norman Olsen, Milton, Florida,
has been identified as a participant in a satanic cult that produced and published a series of videos threatening
the children of investigative journalist Timothy Charles Holmseth." Mr. Holmseth has yet to produce proof of his
accusations.

- 1 25. On 1 September 2015, Mr. Holmseth published on his websites (haleighcummingsdotme.wordpress.com &
2 writeintoaction.com) a blog post titled “**Judicial Blackmail Scheme Against Santa Rosa County, Florida**
3 **Exposed.**” In this article, Mr. Holmseth makes the false claims that Mr. Olsen and his attorney, Kim Picazio,
4 blackmailed Santa Rose County, Florida officials and authorities to secure a good deal in a criminal case that Mr.
5 Olsen was involved in. Mr. Holmseth has yet to produce proof of his accusations.
- 6 26. On 1 November 2015, Mr. Holmseth published on his websites (haleighcummingsdotme.wordpress.com &
7 writeintoaction.com) a blog post titled “**Haleigh Cummings Child Pornography ‘Extortionist’ Wanted by Police**
8 **on Felony Charges.**” Mr. Holmseth makes claims that Mr. Olsen is involved in producing child pornography of
9 missing child Haleigh Cummings. Mr. Holmseth also makes the claim that Mr. Olsen was wanted and being hunted
10 by the United States Marshalls Service. Neither of these claims are true and Mr. Holmseth has yet to produce
11 evidence in support of his accusations to this day.
- 12 27. On 13 January 2016, Mr. Holmseth published on his websites (haleighcummingsdotme.wordpress.com &
13 writeintoaction.com) a blog post titled “**Making a Murderer.**” Mr. Holmseth makes the claim that dozens of
14 government agencies are involved in what he claims is a “massive shadow government coverup.” Mr. Holmseth also
15 accuses dozens of private citizens, including Mr. Olsen, of being involved in this “shadow government.” Mr.
16 Holmseth has yet to produce any evidence to support his accusations.
- 17 28. On 2 March 2016, Mr. Holmseth published on his websites (haleighcummingsdotme.wordpress.com &
18 writeintoaction.com) a blog post titled “**Misty Croslin Donation Website May Hold Clues to Haleigh Cummings**
19 **Kidnapping.**” In this blog post, Mr. Holmseth makes claims that Mr. Olsen is one of the owners of a website called
20 RadioNewz.net, which is a well-known cyber harassment blog. Mr. Olsen has never held any ownership of
21 RadioNewz.net and for almost 2 years has had nothing to do with anyone who posts for that website. Mr. Holmseth
22 has yet to produce any evidence to support his accusations.
- 23 29. On 7 March 2016, Mr. Holmseth published on his websites (haleighcummingsdotme.wordpress.com &
24 writeintoaction.com) a blog post titled “**Amicus Brief Filed in Misty Croslin Appeal.**” In the very first paragraph
25 of this blog post, Mr. Holmseth states the following, “**Document: Florida Governor Rick Scott has possessed**
26 **evidence of child pornography of missing child Haleigh Cummings since October 2015.**” In this blog post, Mr.
 Holmseth makes claims against dozens of individuals stating in part that they’re all involved in human trafficking,
 producing child pornography, kidnapping, rape, and murder. Those individuals are as follows: FDLE Agent Travis
 Smith, FDLE Agent Matt Sears, PCSO Sheriff Jeff Hardy, PCSO Detective John Merchant, PCSO Detective Peggy
 Cone, PCSO Captain Dominic Piscitello, PCSO Major John Greenwood, States Attorney Investigator Chris
 Middleton, FDCF Child Protection Social Worker Bonnie Warner, Fort Lauderdale Private Attorney Kim Picazio,
 Michael Picazio (husband of Kim Picazio), Private Investigator William Staubs, Paula Andrew, Art Harris, Journalist
 Nancy Grace (HLN), Journalist Jane Valez Mitchell (HLN), Jeremiah Regan, John Regan, Wayanne Kruger,

1 Reverend Richard Grund, Christine (Tina) Church, Susan Renee Curry, Journalist Levi Page (HLN/CNN
 2 Contributor), Thomas Norman Olsen (Plaintiff in this action), Reverend Bob Enyart, Alexandria Goddard (close
 3 personal friend of Mr. Olsen), Ronald Cummings, Teresa Neves, Marie Griffis, John Sheffield, Crystal Sheffield,
 4 Connie Sheffield, Ruby Kanger, Jerri Greene, Matthew Staubs, Donna Wagoner, John Doe (Owner of
 5 RadioNewz.net), and Pete Klismet. This list of names shows the scope of the efforts by Mr. Holmseth to defame
 6 innocent individuals of crimes they didn't commit. In this posting, Mr. Holmseth references the vagina of kidnapped
 7 victim Haleigh Cummings on multiple occasions. Mr. Holmseth goes on to accuse Florida Governor Rick Scott and
 8 Attorney General Pam Bondi of being involved. Mr. Holmseth goes on to accuse the following agencies of acquiring
 9 drugs illegally from a clinic in Tallahassee, Florida: Chief Inspector General, Office of the Governor, United States
 10 Attorney's Office, Gadsden County Sheriff's Office, Florida Highway Patrol, Tallahassee Police Department,
 11 Department of Corrections, Department of Agriculture, Florida Department of Law Enforcement, Florida Department
 12 of Health, Leon County Sheriff's Office, Capital Police, Leon County Commission, Florida Department of Revenue,
 13 Republican Party of Florida, Florida House of Representatives, Department of Energy, and Department of Motor
 14 Vehicles. Again, this list goes to show the scale of the unfounded accusations coming from Mr. Holmseth. Mr.
 15 Holmseth has yet to produce any evidence to support his accusations.

16 **30.** On 10 March 2016, Mr. Holmseth published on his websites (haleighcummingsdotme.wordpress.com &
 17 writeintoaction.com) a blog post titled "**Petitioner Terrorized by Pedophile Cult Records Riveting Telephone**
 18 **Call with Shadow Government Operative.**" Mr. Holmseth received the information within this post from an
 19 individual named Deric Lostutter. Deric Lostutter is a former member of "Anonymous" and is currently serving a 2-
 20 year sentence (sentenced 13 April 2017) in federal prison. Deric Lostutter was sentenced to conspiracy and lying to
 21 federal agents. Deric Lostutter previously sued Mr. Olsen in North Carolina federal court for \$1,000,000 which was
 22 dismissed against Mr. Olsen in August 2017. Mr. Holmseth wrote this post attacking Kim Picazio and Mr. Olsen. Mr.
 23 Holmseth makes the claim that Mr. Holmseth reported Mr. Olsen to the Florida Department of Law Enforcement and
 24 FBI for the Youtube video mentioned previously in this complaint. The Florida Department of Law Enforcement
 25 contacted Mr. Olsen shortly after Mr. Holmseth contacted them, more than once, about Mr. Olsen. States Attorney
 26 Investigator Wheeler contacted Mr. Olsen regarding the statements Mr. Holmseth made, assuring Mr. Olsen that if
 Mr. Holmseth contacted them again that charges will be sought against Mr. Holmseth. The FBI has never contacted
 Mr. Olsen regarding any of these accusations. Mr. Holmseth has yet to produce any evidence to support his
 accusations.

31. On 29 May 2017, Mr. Holmseth published on his websites (haleighcummingsdotme.wordpress.com &
writeintoaction.com) a blog post titled "**Press Release: New Evidence Could Lead to Missing Florida Girl**
Haleigh Cummings". In this posting, Mr. Holmseth starts accusing multiple agencies in Indiana of being involved in
 what Mr. Holmseth calls "a shadow government coverup," along with his old accusations against Florida, Minnesota,

1 and Federal agencies. Mr. Holmseth makes the claim that everyone he has accused of being involved in this “shadow
2 government coverup” have been involved in the cases of Haleigh Cummings, Trenton Duckett, Dylan Redwine,
3 Kyron Horman, and Caylee Anthony. These accusations are outrageous, considering Mr. Olsen lived in
4 Kaiserslautern, Germany during the disappearances of Haleigh Cummings, Trenton Duckett, and Caylee Anthony.
5 Mr. Holmseth encourages everyone to contact law enforcement with any information on Mr. Olsen and 10 other
6 individuals and report them all for crimes none of them committed. Mr. Holmseth has yet to produce any evidence to
7 support his accusations.

8 **32.** On 12 August 2017, Mr. Holmseth published on his websites (haleighcummingdotme.wordpress.com &
9 writeintoaction.com) a blog post titled “**Threats Reported to Minnesota and Florida Courts.**” Mr. Olsen
10 commented on a post that Mr. Holmseth wrote stating in part that if Mr. Holmseth did not stop using Mr. Olsen’s
11 name in his website postings and frivolous court filings, that Mr. Olsen would take Mr. Holmseth to court. Mr. Olsen
12 filed for his protective injunction against Mr. Holmseth on 14 August 2017, 2 days after this blog post was published
13 by Mr. Holmseth. Mr. Holmseth looked at this comment by Mr. Olsen as extortion. Mr. Holmseth once again accuses
14 Mr. Olsen of running a blackmail scheme against Santa Rosa County, Florida. Mr. Holmseth had sent what Mr.
15 Holmseth claims is an affidavit to Mr. Olsen’s probation officer in Santa Rosa County, Florida. Mr. Olsen’s probation
16 officer did not even read what Mr. Holmseth had sent him on Mr. Olsen. Mr. Olsen’s probation officer saw the front
17 page and questioned Mr. Olsen about it and who Mr. Holmseth is. After explaining to his probation officer who Mr.
18 Holmseth is, Mr. Olsen asked for a copy of the documents that Mr. Holmseth had sent Mr. Olsen’s probation officer,
19 to be used in Mr. Olsen’s protective injunction case against Mr. Holmseth. Mr. Olsen’s probation officer didn’t want
20 it and handed the original to Mr. Olsen with the envelope it was sent in stating in part that he wanted nothing to do
21 with it and that it has absolutely nothing to do with Mr. Olsen’s previous criminal case. Mr. Holmseth has yet to
22 produce any evidence in support of his accusations.

23 **33.** On 13 August 2017, Mr. Holmseth published on his websites (haleighcummingdotme.wordpress.com &
24 writeintoaction.com) a blog post titled “**Update: Convicted Felon That Threatened Timothy Charles Holmseth**
25 **Will Be Reported to State of Florida for Extortion.**” Mr. Holmseth makes claims that he is filing a report in the
26 state of Florida and Minnesota against Mr. Olsen for extortion. These reports were completely dismissed by
27 Minnesota and Florida authorities. Mr. Holmseth has yet to produce any evidence in support of his accusations.

28 **34.** On 13 August 2017, Mr. Holmseth published on his websites (haleighcummingdotme.wordpress.com &
29 writeintoaction.com) a blog post titled “**Florida Publisher Implicating Minnesota Journalist in Kidnapping and**
30 **Murder of Five-Year-Old Girl – Fake Narrative Connected to Florida Lawyer and East Grand Forks Police in**
31 **Advance of Court Hearing.**” This blog post was in direct response to another blogger, William Murtaugh from
32 Orlando, Florida. William Murtaugh is a close friend of Mr. Olsen. William Murtaugh went to the defense of Mr.
33 Olsen and started to refute and produce evidence against the accusations that Mr. Holmseth has written. William

1 Murtaugh has been attacked by Mr. Holmseth dozens of times, accusing William Murtaugh of the same acts that Mr.
2 Holmseth accuses Mr. Olsen of committing. Mr. Holmseth has yet to produce any evidence in support of his
3 accusations.

4 **35.** On 17 August 2017, Mr. Holmseth published on his websites (**haleighcummingsdotme.wordpress.com &**
5 **writeintoaction.com**) a blog post titled **“U.S. Court Requested to Hear Evidence of Kidnapping and Child Porn**
6 **Cover Up Involving Minnesota Police Department.”** In this blog post, Mr. Holmseth posts a request he sent to a
7 federal court to reopen a civil lawsuit that was dismissed in 2015, stating that he had new evidence naming Mr. Olsen
8 and dozens of other individuals in a kidnapping and child porn cover up scheme. Mr. Holmseth must receive
9 permission from a federal judge before filing any new case in any court due to Mr. Holmseth being labeled a
10 vexatious litigator. Mr. Holmseth has yet to produce any evidence in support of his accusations.

11 **36.** On 18 August 2017, Mr. Holmseth published on his websites (**haleighcummingsdotme.wordpress.com &**
12 **writeintoaction.com**) a blog post titled **“‘Federal Question’ May Expose Florida Actors in Kidnapping, Child**
13 **Porn, and Extortion Cover-Up Scheme.”** Mr. Holmseth refers to the fact that in Mr. Olsen’s petition for a
14 protective injunction that Mr. Olsen requested the court force Mr. Holmseth to remove any posts that Mr. Holmseth
15 made about Mr. Olsen online. Mr. Holmseth also accuses Mr. Olsen of blackmailing Santa Rosa County, Florida
16 once again. Mr. Holmseth has yet to produce any evidence to support his accusations.

17 **37.** On 5 September 2017, Mr. Holmseth published on his websites (**haleighcummingsdotme.wordpress.com &**
18 **writeintoaction.com**) a blog post titled **“Press Release — Secret Casey Anthony Facts Going to Florida Courts.”**
19 Mr. Holmseth mentions Mr. Olsen by name in this blog post, in direct violation of Mr. Olsen’s active protective
20 injunction and Florida Cyberstalking Statute §784.048(1)(d), §784.048(2), and §784.048(4). Mr. Holmseth makes a
21 reference that he filed for a Notice of Removal in the United States District Court for the Northern District of Florida
22 (**Case #3:17cv667-MCR-CJK**), which was dismissed outright by United States Magistrate Judge Charles J. Kahn, Jr.
23 Mr. Holmseth has yet to produce any evidence in support of his accusations.

24 **38.** In all of Mr. Holmseth’s blog posts, Mr. Holmseth mentions Mr. Olsen by name one hundred three (103) times.

25 **39.** Because of Mr. Holmseth’s abuse over the last 2 years, Mr. Olsen’s reputation and job prospects have suffered. Most
26 employers Google a prospective employee’s name before hiring, during this background process any prospective
employer of Mr. Olsen’s would easily find the postings made by Mr. Holmseth on his websites.

Claim for Relief

40. Mr. Olsen hereby incorporates the foregoing paragraphs as if fully set forth herein.

41. As stated above, Mr. Olsen has been irreparably damaged due to the actions of Mr. Holmseth.

42. Mr. Holmseth has shown he does not care as to who he harms with his false allegations.

1 43. Mr. Olsen has tried other means to resolve any issue with Mr. Holmseth and Mr. Olsen feels this is the next action
2 needed to be taken for relief.

3 44. As stated above, Mr. Holmseth violated the protective injunction granted against Mr. Holmseth temporarily on 14
4 August 2017 and permanent on 6 September 2017, filed by Mr. Olsen in the First Judicial Circuit of Florida, multiple
5 times. Mr. Olsen feels this action is the only way to obtain relief.

6 45. Due to Mr. Holmseth's violation of the protective injunction granted for Mr. Olsen, Mr. Holmseth shows complete
7 disregard and disrespect towards the court and its laws.

8 46. Due to Mr. Holmseth's previous violation of Kim Picazio's protective injunction, this shows a pattern and history by
9 Mr. Holmseth of complete lack of respect for any court and its laws.

10 47. Mr. Holmseth, to the date of this Complaint, continues to defame and harass dozens of individuals nationwide,
11 including Mr. Olsen, with unfounded lies and false accusations.

12 **Prayer for Relief**

13 Wherefore, Mr. Olsen requests the following relief:

14 48. That this Court issue a declaratory judgement that Mr. Olsen is entitled to an award in damages totaling **\$200,000** for
15 defamation, libel, targeted harassment, and multiple violations of Florida's Stalking and Harassment Statutes.

16 49. That this Court award Mr. Olsen monetary compensation for any future damages incurred by the social media reach
17 of the actions by Mr. Holmseth mentioned in this Complaint.

18 50. That this Court order the removal of **haleighcummingsdotme.wordpress.com** and **writeintoaction.com**, both
19 websites operated by Mr. Holmseth. Mr. Holmseth has shown that no judgement will prevent his actions, so removal
20 of his websites is the next best viable option.

21 51. That this Court issue an order preventing Mr. Holmseth from creating anymore websites to defame, stalk, or harass
22 **anyone**.

23 52. That this Court order Mr. Holmseth from mentioning Mr. Olsen directly or indirectly (mentioning Mr. Olsen's
24 hometown, county, describing Mr. Olsen without mentioning names, etc...) anywhere online. This includes but is not
25 limited to Facebook, Twitter, Instagram, individually owned websites, etc...

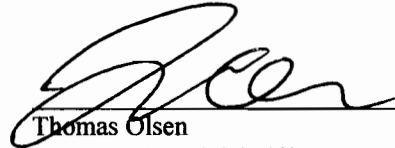
26 53. That this Court order Mr. Holmseth to remove any mention of Mr. Olsen from all of Mr. Holmseth's social media
accounts (Twitter, Facebook, Instagram, etc...)

54. That this Court issue an order so Mr. Olsen can recover all costs associated with this action from Mr. Holmseth, to
include attorney fees, filing fees, travel costs, etc...

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Mr. Olsen hereby demands a trial by jury on all issues presented herein.

This 2 of ~~October~~ 2017.
November



Thomas Olsen
Pro-Se Litigant/Plaintiff

5725 Forest Hills Lane
Milton, Florida 32570

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Certificate of Service

I, Thomas Norman Olsen, do hereby swear and affirm that a true and correct copy of the foregoing Complaint and Motion for Relief Judgement was mailed to the Defendant listed herein.



Affiant

11/2/17

Date



Notary Public



LaRhonda Moore Rogers
Notary Public, State of Florida
My Comm. Expires April 6, 2021
Comm No GG 86217

11/2/17

Date

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Affidavit of the Plaintiff

Thomas Norman Olsen

Plaintiff,

V.

Timothy Charles Holmseth

Defendant

The Plaintiff, Thomas Norman Olsen, hereby swears and affirms the foregoing complaint and contents therein are true and correct to the best of his knowledge under penalty of perjury in the state of Florida.

FURTHER AFFIANT SAYETH NAUGHT

[Signature]

Affiant

11/2/17

Date



LaRhonda Moore Rogers
Notary Public, State of Florida
My Comm. Expires April 6, 2021
Comm No GG 86217

LaRhonda Moore Rogers

Notary Public

11/2/17

Date