

November 24, 2025

Via Certified and Regular U.S. Mail

✓ Alex Kharam
Alpha News
13033 Ridgedale Dr., PMB #101
Minnetonka, MN 55305

Elizabeth Collin
3106 Irving Ave N.
Minneapolis, MN 55411

Matter: *Jacqueline Alderman v. Alpha News and Elizabeth Collin*
Our File: Alderman-44358-MJS

FOR SETTLEMENT PURPOSES ONLY
INADMISSIBLE PURSUANT TO MINN. R. EVID. 408

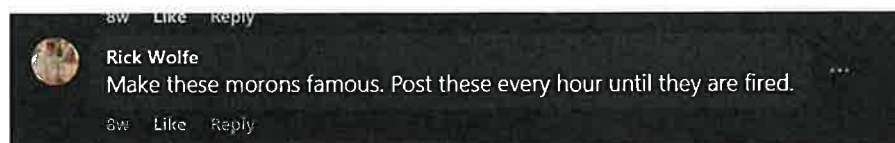
Mr. Kharam and Ms. Collin:

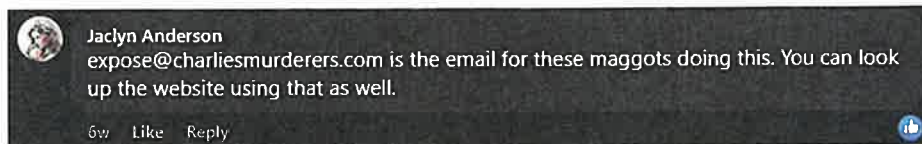
Our firm represents Jacqueline Alderman. Please direct this letter to your attorney if you are represented by counsel and have your attorney notify us of such representation.

We are writing because Ms. Alderman reported that you have published derogatory statements about Ms. Alderman, with the express intention to encourage third parties to harass, harm, or target Ms. Alderman in her personal and professional life.

Specifically, we are aware that shared to social media that Ms. Alderman made a “public post[] on Charlie Kirk.” You shared to social media Ms. Alderman’s social media page, her employer, and her position, along with the information of two other teachers.

The intention behind these posts was to cause Ms. Alderman harm, and particularly, attempt to cause Ms. Alderman to lose her job and be subject to doxxing. Followers understood this intention, and explicitly commented:

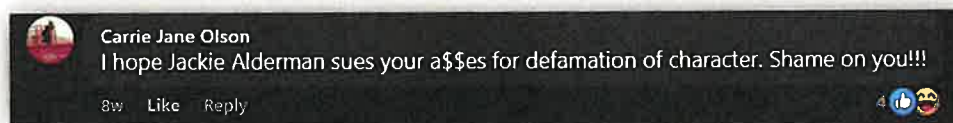
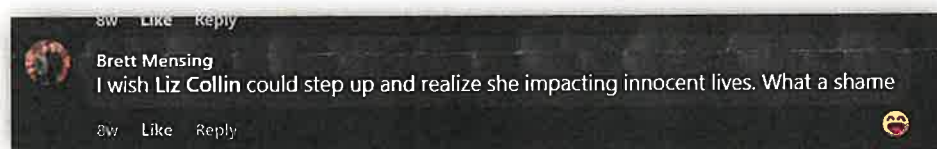




Other commenters replied Ms. Alderman "should be canned;" "I'll be calling the school tomorrow;" and "Shared with ISD 728 school board chair. Elk River is part of that district." Multiple commenters replied Ms. Alderman should be fired and urged contacting the school district.

Shares from Facebook including statements "let's get her fired;" "Freedom of speech does not come without consequences & yes MN is an 'At Will' state;" "Elk River-you can know their phone number easily!!" Additional commenters stated another teacher was "no longer employed" and asked to "report" Ms. Alderman to a doxxing website.

This is further evidenced by surrounding posts wherein Alpha News and Liz Collins shared statements calling for the termination or resignation of individuals who made comments viewed as anything other than condolences following the assassination of Charlie Kirk. Other commenters expressly noted the harm Alpha News and Ms. Collin were causing:



As a result of the actions by Alpha News and Ms. Collin, Ms. Alderman has suffered personal, professional, and reputational harm. Family members have sustained property damage. Ms. Alderman has now been unemployed for two months. Despite applying for more than 30 jobs, Ms. Alderman has been unable to secure another position. This is unsurprising as an internet search of

“Jackie Alderman” returns the Alpha News Facebook post as the first result.

Additionally, Ms. Alderman has been subjected to ongoing harassment with phone calls, emails, and messages. Ms. Alderman has been called derogatory terms, including a “nasty cunt.” Ms. Alderman, including her children, are in fear of constant harassment and doxxing.

Discussion

Harassment

Harassment includes “repeated incidents of intrusive or unwanted acts, words, or gestures that have a substantial adverse effect or are intended to have a substantial adverse effect on the safety, security, or privacy of another.” Minn. Stat. § 609.748, subd. 1(a)(1) (2025).

“The determination of whether certain conduct constitutes harassment may be judged from both an objective standard, when assessing the effect the conduct has on the typical victim, and a subjective standard, to the extent the court may determine the harasser's intent.” *Kush v. Mathison*, 683 N.W.2d 841, 845 (Minn. App. 2004).

Words are no less intrusive, unwanted, and detrimental to privacy if they are conveyed to the victim through third parties. “There is no less significance or special significance to the contact simply because it was completed by a third party after being instigated or initiated” by the harassing party. *See State v. Egge*, 611 N.W.2d 573, 575 (Minn. Ct. App. 2000) (affirming jury determination that defendant violated HRO by initiating contact with victim through a third party), *review denied* (Minn. Aug. 15, 2000). Indeed, the fact that an actor's harassing words are conveyed to the victim through others may, if anything, make them more egregious.

Johnson v. Arlotta, No. A11-630, 2011 WL 6141651, *3 (Minn. App. Dec. 12, 2011); *see also Herbst v. Herbst*, No. A05-945, 2006 WL 279100, *2 (Minn. App. Feb. 7, 2006) (holding letters to appellant's employer implying appellant should be terminated constituted harassment).

Similarly, “[w]hether words constitute harassment does not turn on their truth or falsity. Rather, it is the repeated use of the words and the substantial adverse effect they have or are intended to have on the victim's safety, security, or privacy that is determinative.” *Johnson*, No. A11-630, 2011 WL 6141651, at *3 (citation modified).

Here, the conduct by Alpha News and Ms. Collin constitutes harassment and doxxing. *See Vangheluwe v. Got News, LLC*, 365 F.Supp.3d 850, 858–59 (E.D. Mich. 2019) (doxxing “involves using the Internet to source out and collect someone's personal and private information and then publicly releasing that information online. The goal of doxxing is typically retribution, harassment, or humiliation.” (citation modified)). Alpha News and Ms. Collin were aware followers were using this information to dox individuals, and specifically, that followers were demanding Ms. Alderman

be terminated from employment. Alpha News and Ms. Collin intended that result and shared that other individuals had lost their jobs due to the harassment campaigns.

Intentional Infliction of Emotional Distress

In Minnesota, a plaintiff states a claim for intentional infliction of emotional distress by showing the following four elements: 1) the conduct must be extreme and outrageous; 2) the conduct must be intentional or reckless; 3) it must cause emotional distress; and 4; the distress must be severe. *Langeslag v. KYMN Inc.*, 644 N.W.2d 860, 864 (Minn. 2003); *see also Hubbard v. United Press Intern., Inc.*, 330 N.W.2d 428, 438 (Minn. 1983) (citing *Restatement (Second) of Torts* § 46(1) (1965)); *Wenigar v. Johnson*, 712 N.W.2d 190, 207 (Minn. App. 2006) (“To prove the intentional infliction of emotional distress, respondent must show appellant’s conduct (1) was extreme and outrageous; (2) was intentional or reckless; (3) caused emotional distress; and that the emotional distress caused by appellant (4) was severe.”).

The effects of doxxing are sufficient for a claim of intentional infliction of emotional distress. *Vangheluwe*, 365 F.Supp.3d at 861. As a result of the doxxing campaign by Alpha News and Ms. Collin, Ms. Alderman was the subject of threatening messages, phone calls, voicemails, and emails. Ms. Alderman’s family suffered property damage. Ms. Alderman, and her immediate family, are in fear for their safety and ongoing harassment.

Demand

Based on the foregoing considerations, we demand that you promptly do the following:

1. Immediately retract all statements regarding Ms. Alderman that you have made on social media posts, comments, replies, or any other public forums. Delete all posts, shares, comments, replies, or any other statement regarding Ms. Alderman, including but not limited to, any and all statements identifying Ms. Alderman’s profile or employment. A copy of all social media posts, including all comments and shares, should be preserved in an electronic file for potential future litigation.
2. Cease and desist from making any additional statements, publications, posts, discussions, or sharing any information about Ms. Alderman.
3. Provide us with written assurance that you have fully complied with these demands.

Closing

I request that you or your attorney contact me immediately to discuss this matter. If you do not comply with the above-noted demands by **December 3, 2025**, please be advised that Ms. Alderman hereby reserves all rights and remedies—including the right to pursue any and all legal actions—without prejudice, and nothing in this letter shall be construed as a waiver of those rights.

Finally, please treat this letter as formal notice of your obligation to preserve all potentially relevant evidence.. Be advised that destroying or altering such evidence may lead to court-imposed sanctions in future litigation. Accordingly, you must retain all physical and electronic materials, including (but not limited to) emails, text messages, search histories, voicemails, social media posts, comments, social media messages, Facebook and X history, electronic files, drives, and any archived or backup data.

Sincerely,

Dougherty, Molenda, Solfest, Hills & Bauer P.A.

S/ Cassandra C. Wolfgram

Cassandra C. Wolfgram

cc: Client