

United States District Court
for the
Southern District of Iowa

RECEIVED
APR 14 2025
CLERK U.S. DISTRICT COURT
SOUTHERN DISTRICT OF IOWA

United States government, under the
Authority of We the People,

Prosecutor,

v.

Donald Trump, Kim Reynolds, Brenna
Bird, Christopher Deist, Kevin Alons,
Mike Bousselot, Doug Campbell, Mark
Costello, Dan Dawson, Rocky De Witt,
Adrian Dickey, Dawn Driscoll, Lynn
Evans, Julian Garrett, Jesse Green, Kerry
Gruenhagen, Dennis Guth, Mike Klimesh,
Carrie Koelker, Tim Kraayenbrink, Mark
Lofgren, Charli McClintock, Mike Pike,
Jeff Reichman, David Rowley, Ken
Rozenboom, Sandy Salmon, Jason Schultz,
Annette Sweeney, Tom Shipley, Dave
Sires, Jeff Taylor, Kara Warme, Scott
Webster, Cherielynn Westrich, Jack
Whitver, Dan Zumbach, Jerry Behn, Brett
Barker,, David Blom, Jane Bloomingdale,
Brooke Boden, Jacob Bossman, Steven
Bradley, Mark Cisneros, Taylor Collins,
Tom Determann, Zach Dieken, Jon
Dunwell, Samantha Fett, Dean Fisher,
Jason Gearhart, Dan Gehlbach, Thomas
Gerhold, Cindy Golding, Pat Grassley, Bill
Gustoff, Helena Hayes, Robert Henderson,
Christian Hermanson, Steven Holt,
Heather Hora, Thomas Jeneary, Craig
Johnson, Megan Jones, Bobby Kaufmann,
Barb Kniff McCulla, Shannon Latham,
Judd Lawler, Shannon Lundgren, Joshua
Meggers, Ann Meyer, Gary Mohr, Tom

CASE NO.

RECEIVED
2025 MAR 31 P 12:22
U.S. ATTORNEY
S.D. IOWA

Moore, Carter Nordman, Matthew Rinker,
Mike Sexton, Jeff Shipley, Brent Siegrist,
Travis Sitzmann, Jennifer Smith, Ray
Sorensen, Henry Stone, Mark Thompson,
Charley Thomson, Mike Vondran, Ryan
Weldon, Sam Wengryn, Skyler Wheeler,
Craig Steven Williams, John Wills, John
Wilz, Matt Windschitl, Devon Wood,
Derek Wu If, David Young,
REPUBLICAN PARTY OF IOWA,
CAPITOL MINISTRIES, REPUBLICAN
NATIONAL COMMITTEE, STATE OF
IOWA, and John and Jane Doe(s), *et al.*

Defendants.

CRIMINAL COMPLAINT

We, the complainants in this case, state the following is true to the best of our knowledge and beliefs. On or about dates ranging from, at least, May 3, 2019 to March 31, 2025 in the county of Polk in the Southern District of Iowa, the defendants violated:

Code Section

Offense Description

Charge I

United States Code Title 18 § 241 –
Conspiracy against rights

Class D felony: 18 USC § 3559(a)(4).

18 U.S. Code § 241: “If two or more persons conspire to injure, oppress, threaten, or intimidate any person in any State... in the free exercise or enjoyment of any right or privilege secured to (any natural person) by the Constitution or laws of the United States.... They shall be fined under this title or imprisoned not more than ten years, or both....”

Charge 2

United States Code Title 18 § 242 –
Deprivation of rights under color of law

Class [] felony: 18 USC § 3559

18 U.S. Code § 242: “Whoever, under color of any law, statute, ordinance, regulation, or custom, willfully subjects any person in any State... to the deprivation of any rights, privileges, or immunities secured or protected by the Constitution or laws of the United States..., shall be fined under this title or imprisoned not more than one year, or both....”

Charge 3

18 U.S. Code § 371 - Conspiracy to commit
offense or to defraud United States

Class [] felony: 18 USC § 3559

18 U.S. Code § 371: “If two or more persons conspire either to commit any offense against the United States, or to defraud the United States, or any agency thereof in any manner or for any purpose, and one or more of such persons do any act to effect the object of the conspiracy, each shall be fined under this title or imprisoned not more than five years, or both.”

Charge 4

United States Code Title 18 § 1621 –
Perjury generally (Perjury of Oath)

Class [] felony: 18 USC § 3559.

18. U.S. Code § 1621: “Whoever— (1) having taken an oath before a competent tribunal, officer, or person, in any case in which a law of the United States authorizes an oath to be administered, that he will testify, declare, depose, or certify truly, or that any written testimony, declaration, deposition, or certificate by him subscribed, is true, willfully and contrary to such oath states or subscribes any material matter which he does not believe to be true; or (2) in any declaration, certificate, verification... willfully subscribes as true any material matter which he does not believe to be true; is guilty of perjury and shall, except as otherwise expressly provided by law, be fined under this title or imprisoned not more than five years, or both. This section is applicable whether the statement or subscription is made within or without the United States.

Charge 5

United States Code Title 18 §§ 1961-1968 –
RICO Laws

Class [] felony: 18 USC § 3559.

18 U.S. Code § 1961: "racketeering activity" means (A) any act or threat involving... **extortion**; (B) any act which is indictable under any of the following provisions of title 18, United States Code:... **section 1503** (relating to obstruction of justice), **section 1510** (relating to obstruction of criminal investigations),... **section 1952** (relating to racketeering)....

18 U.S. Code § 1962: (a) It shall be unlawful for any person who has received any income derived, directly or indirectly, from a pattern of racketeering activity... (b) It shall be unlawful for any person through a pattern of racketeering activity or through collection of an unlawful debt to acquire or maintain, directly or indirectly, any interest in or control of any enterprise which is engaged in, or the activities of which affect, interstate or foreign commerce. (c) It shall be unlawful for any person employed by or associated with any enterprise engaged in, or the activities of which affect, interstate or foreign commerce, to conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity or collection of unlawful debt.

18 U.S. Code § 1963: a) Whoever violates any provision of section 1962 of this chapter shall be fined under this title or imprisoned not more than 20 years (or for life if the violation is based on a racketeering activity for which the maximum penalty includes life imprisonment), or both, and shall forfeit to the United States, irrespective of any provision of State law-... [See full statute]

See §§ 1964-1968 for additional
RICO-related statutes.

Additional charges may become applied.

This criminal complaint is based on these facts:

1. Definitions for all terms which appear emboldened may be found within the Glossary of Terms.
2. All named defendants, and likely some unnamed, are **conspirators**. All such conspirators may also be referred to as **co-conspirators**.
3. Co-conspirators conspired and continue to conspire in order to violate the rights of, and cause **personal injuries** to, a class of persons currently protected against discrimination by the Iowa Civil Rights Act (ICRA), Civil Rights Act (CRA),¹ Equality Clause² (of the Iowa Constitution, Equal Protections Clause of the Fourteenth Amendment, and American Common Law.
4. The Iowa Civil Rights Act, modelled after the Civil Rights Act, is designed, in part, to provide **remedies** to civilians who may become adversely impacted via discriminatory acts: against discrimination in the areas of employment, housing, credit, education, and public accommodations. On March 8, 2019 the Iowa Supreme Court found, in Good and Beal v. Department of Human Services (2018), that (1) surgeries for transgender persons are in fact medically necessary, and (2) the Iowa Civil Rights Act prohibits discrimination against

¹ The Supreme Court ruled, in Bostock v. Clayton County, Georgia, 590 U.S. ___, 140 S. Ct. 1731 (2020), that Title VII of the Civil Rights Act of 1964, which prohibits employment discrimination based on sex, also prohibits discrimination based on sexual orientation and gender identity.

² When Alexander Clark sued the Muscatine Board of School Directors [*Clark v. Bd. of Sch. Dirs.*, 24 Iowa 266, 277 (1868)] so that his daughter, Susan, could attend the all-white public schools, the Iowa Civil Rights Act was not yet written, and there was no precedent for Clark to cite in Court. Therefore he relied heavily upon the Equality Clause of the Iowa Constitution. The Court articulated, in their ruling favorable to *Clark* (and all Iowans), that discrimination against categories of persons not even mentioned in today's Iowa Civil Rights Act, are in fact prohibited. The Court wrote that discrimination against someone based on their, "[N]ationality, religion, color, clothing or the like," is prohibited. *Clark* demonstrates that Iowa's legal protections extend beyond the **positive law**,

transgender persons from being able to receive access to Medicare or Medicaid. The Medicare and Medicaid Act guarantees that all US Citizens have the rights (1) to be treated with courtesy, dignity and respect at all times, (2) to be protected from discrimination, (3) to have personal and health information kept private, and (4) to have access to doctors, specialists, and hospitals for medically necessary services (Medicare.gov).

5. Co-conspirators have been working to violate all rights, deny access to all remedies at Law and Equity, and related Lawful Protections mentioned in 3; simultaneously, Defendants have actively worked to foster a political culture filled with fear and distrust of government throughout the State of Iowa, United States, and beyond which is hostile toward the protected class (victims). The REPUBLICAN PARTY OF IOWA, REPUBLICAN NATIONAL COMMITTEE, and STATE OF IOWA appear *prima facie* to be racketeering-influenced corrupt organizations (RICO Laws) used by co-conspirators to extort funds toward unlawful ends; all three organizations must be purged of any and all apparent and hidden infiltration, wherever it may lie. Special Elections may be required in order to fill necessary Governmental roles. There are likely other racketeering-influenced corrupt organizations involved whom prosecutors may become aware of during investigations; such organizations, and individuals involved, shall be added as defendants.

6. Shortly after the *Good* ruling, on May 3, 2019, numerous co-conspirators enacted HF 766, which included, on page 84, "Division XX". This provision, subversively slipped into the lengthy bill, was devised to authorize the State of Iowa to deny medically-necessary services to the victims in this case, setting forth: "This section shall not require any state or local government unit or tax-supported district to provide for sex reassignment surgery or any other cosmetic, reconstructive, or plastic surgery procedure related to transsexualism,

hermaphroditism, gender identity disorder, or body dysmorphic disorder." Countless medically-necessary procedures for transgender Iowans were cancelled as a result. The enactment of HF 766/Div. XX, while knowingly and willingly violating the clearly-established rights of a class of persons via doing so, constituted a violation of the 18 U.S. Code §§ 241, 242; these unenumerated rights are facially secured by the Medicare and Medicaid Act and guaranteed by the Ninth Amendment.

7. In November 2021, Judge William Kelly struck down the HF766 provision, rightly pointing out that it was "discriminatory and unconstitutional", and that it "violates the Iowa Constitution and the Iowa Civil Rights Act".³ Following the Iowa District court's 2018 ruling, Kim Reynolds' spokesperson stated that Ms. Reynolds was "disappointed in today's decision and disagrees with the district court's ruling on Medicaid coverage for transgender reassignment surgeries," and that were "reviewing the decision with our legal team and exploring all options [with regard to violating the rights of transgender Iowans] moving forward."⁴ This statement, in conjunction with the repeated efforts toward the ends of violating the rights of transgender Iowans, indicates prejudice, discrimination, malice, premeditation, and animus by the various defendants, against their intended and *de facto* victims.

8. The ACLU of Iowa challenged HF 766/Div. XX in *Vasquez and Covington v. Department of Human Services* (2023). Meanwhile, transgender Iowans waited for the Court to

³ Gruber-Miller, Stephen. (Nov. 22, 2021). *Iowa Can't Block Medicaid Coverage for Gender Confirmation Surgery, Judge Rules*. The Des Moines Register, Des Moines Register. www.desmoinesregister.com/story/news/politics/2021/11/22/iowa-law-unconstitutional-ban-medicaid-coverage-transgender-transition-gender-confirmation-surgery/8722373002/.

⁴ Clark Kauffman, Iowa Capital Dispatch November 22. "Reynolds 'disappointed' in Ruling on Transgender Medicaid Coverage." Iowa Capital Dispatch, 23 Nov. 2021, <https://iowacapitaldispatch.com/2021/11/22/reynolds-disappointed-in-ruling-on-transgender-medicaid-coverage/>.

rule a second time on the same issue, unable to schedule appointments for years as a result of continuing rights violations perpetrated by the defendants. In spring 2023 the Iowa Supreme Court declined to issue a ruling, however, pointing out that this issue had already been decided in *Good*, and that legal protections for persons based on their gender identity, as found in the Iowa Civil Rights Act, prevented the STATE OF IOWA from denying coverage.

8. On February 8, 2024, one of the victims in this case, Alexandra “Sondra” Wilson, filed a suit against the STATE OF IOWA and KIM REYNOLDS FOR IOWA, due to numerous acts of defamation, rights violations, and ongoing threats and conspiracy. *See* Attachment A – Amended Petition for case #LACL157953. Judge Huppert wrote incorrect information into the ruling, then ruled according to what he wrote instead of what Ms. Wilson wrote. Then the Iowa Supreme Court denied her right to appeal based upon legal shenanigans which may be explained in detail by this key witness.

9. After repeatedly slandering transgender persons, in collusion with numerous other parties who may be entered into this case as Defendants, after becoming elected, Donald Trump, acting under color of authority, greenlit tortious and illegal state actions which were then performed by numerous Defendants, also acting under color of authority, who became emboldened by Mr. Trump’s illegal, wrongful, collusive acts. Some, but not all, collusive acts, included the issuance of the following Executive Orders (EO) and political threats, nearly immediately following the Presidential inauguration:

- Jan. 20 EO, “Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government”, Trump falsely claimed that transgender women are “men who self-identify as women”. He then goes on to claim that his administration “[W]ill defend women’s rights and protect freedom of conscience” while in the same breath inciting sex and gender-based harassment against transgender women.

- Jan. 21 EO, “Ending Illegal Discrimination and Restoring Merit-Based Opportunity” rescinded President Truman’s landmark 1965 EO 11246, requiring affirmative action and forbidding federal contractors from discrimination on the basis of race, color, religion, sex, sexual orientation, gender identity, or national origin. Conflating “civil rights protections” with “DEI”, Donald Trump rescinded this landmark civil rights order under the false pretense of promoting “Diversity, Equity, and Inclusion”.
- Jan. 27 EO, “Prioritizing Military Excellent and Readiness”, President Trump tortiously defamed transgender people, accusing them of “[E]xpressing a false ‘gender identity’” and not living “[A]n honorable, truthful, and disciplined lifestyle.” He wrote, “A man’s assertion that he is a woman, and his requirement that others honor this falsehood.”

The Trump Admin also erased the “T” from LGBT+ related government websites, and scrawled harmful, defamatory language across the tops of HHS, CDC, and other federal websites, directed toward transgender people. Trump has similarly threatened to cut federal funding from universities who don’t comply with his ultimatums. He conflates and mislabels “civil rights protections” with “DEI” in his speeches, then eliminates civil rights protections and threatens safety while repeatedly slandering transgender Americans. The list goes on, and there is likely more behind the scenes which subpoenas may be used to locate and identify, including the identification of additional Defendants

9. Between February 24 and 28, State of Iowa officials rushed a bill through two subcommittees, the Iowa House and Senate, and, within 4 days, to the Governor’s desk. This bill, Iowa Senate File 418, was designed specifically to remove protections against discrimination from transgender people, leaving transgender Citizens without legal recourse, and opening the floodgates to allow open discrimination throughout the state. Upon signing the bill into law, and thus, committing extortion (thus violating 18 U.S.C. § 872), defendant Kim Reynolds, under color of authority, released a statement which clearly indicated the co-conspirators’ motive: to

deny medically necessary services to transgender Iowans. Reynolds stated, “[Legal protections in the Iowa Civil Rights Act which prohibit discrimination against transgender Iowans] has... forced Iowa taxpayers to pay for gender reassignment surgeries. That is unacceptable to me, and it is unacceptable to most Iowans.... What this bill does accomplish is to strengthen protections for women and girls, and I believe that is the right thing to do.” Reynolds, under color of law, violated the rights of a vulnerable class of persons explicitly protected against such discrimination by the Iowa Civil Rights Act and Civil Rights Act.

10. The Court is requested to immediately issue an injunctive protective order to prevent any behind-the-scenes actions targeting transgender persons; these are only some examples.

NOTICE TO GOVERNMENT OFFICIALS AND LAWYERS OF GOOD NATURE:

DUE TO MENTAL AND EMOTIONAL EXHAUSTION, the Author of this document, Sondra Wilson, has stopped, unable to write more into this at this time. We shall file this document as is. Sondra requests to work with Law Enforcement during the investigation, and is willing to finish this document.

State political threats:

2. Between February 24 and February 28, the following defendants, acting under **color of authority**, caused a **legal injury** to a class of persons⁵ explicitly and implicitly protected by the Iowa Civil Rights and the Civil Rights Act:

4. Co-conspirators did in fact violate the rights of a class of persons performed numerous overt acts of furtherance with regard to, the elimination of legal protections for transgender

⁵ Transgender persons.

Iowans. Facially, eliminating access to legal recourse for transgender Iowans appears to have a two-fold motive for the conspirators:

- (i) So that co-conspirators, and their financial supporters (e.g. lobbyists) may violate the rights of transgender persons at will, without risk of generating a potential lawsuit, and
- (ii) To eliminate taxpayer burden via cutting off access to medically-necessary procedures for transgender individuals currently and/or in the future who are covered by Medicare or Medicaid. In order to achieve this motive, co-conspirators agreed to (1) eliminate potential avenue for legal recourse which is currently available to the transgender Iowans, and then to (2) violate the rights of transgender Iowans.

, toward the end goal of violating rights, and denying potential legal remedies to, transgender Iowans, whom are protected against discrimination based on “gender identity”, shall henceforth, throughout this complaint, be referred to as “victims”, as they are the victims of crimes cited herein.

3. Rights such as those secured by the Medicare and Medicaid Act, all of which the aforementioned rights are also called **unenumerated rights**.

Elements of the crime: (1) two or more persons conspire, (2) to injure, oppress, threaten, or intimidate any person in any State...., (3) in the free exercise or enjoyment of any right secured by the Constitution or laws of the United States.

Element 1: All defendants conspired and are actively conspiring to cause legal injury to a class of persons protected against discrimination by the Civil Rights Act, Medicare and Medicaid Act, Fourteenth Amendment of the Constitution of the United States.

- **Element 3: “Laws of the United States”** generally refers to **federal laws** (as opposed to state laws), and therefore includes **The Medicare and Medicaid Act and Civil Rights Act**.

Prima facie evidence indicates all defendants conspired to cause legal injury to have

II. Defendants conspired, on numerous occasions, and made multiple successful attempts; to deprive transgender Citizens' rights to receive access to medically-necessary services.

Numerous occasions included:

While doing so, Defendants did not treat victims with courtesy, dignity, or respect while actively discriminating against, and, through various agencies, deployed numerous acts of defamation and incitement of harassment against the target class of persons, over a course of years, in order to turn public opinion against the class of persons, and incite harassment against them, to harm their reputations in a manner so as to illicit acts of public ridicule, throughout the state and nation, over a course of years during which time the conspiracy took place, with the express goal of undermining and erosion of faith in legal protections provided by the the Medicare and Medicaid Act, the Civil Rights Act, and the Iowa Civil Rights Act.

II. All defendants are co-conspirators who acted with malice, intentionally, and in a premeditated manner in order to deprive a class of persons of rights secured to them by the laws of the United States, including but not limited The Medicare and Medicaid Act and the Civil Rights Act. Defendants conspired in order to deprive a class of persons explicitly protected against discrimination by (1) the Iowa Civil Rights Act and Equality Clause of the Iowa Constitution, and (2) the Civil Rights Act and the Equal Protections Clause of the Constitution of the United States.

; they performed coordinated, illegal actions, in tandem and cooperation with one another, with express intent to cause legal injury and deny public accommodations to a class of persons explicitly protected against such discriminatory acts, by the Iowa Civil Rights Act and Civil Rights Act. Motive included strong desire to deny a protected and socially vulnerable class of persons from being able to access medically necessary procedures, and to deny the possibility of

All defendants are co-conspirators who acted with malice, intentionally, in a premeditated manner; they performed coordinated, illegal actions, in tandem and cooperation with one another, with express intent to cause legal injury and deny public accommodations to a class of persons explicitly protected against such discriminatory acts, by the Iowa Civil Rights Act and Civil Rights Act. Motive included strong desire to deny a protected and socially vulnerable class of persons from being able to access medically necessary procedures, and to deny the possibility of

statement or subscription is made within or without the United States.

18. U.S. Code § 1621 – Perjury of oath:

All named defendants who are natural persons⁶ who swore either of the following Oaths of Office, pursuant to Article III § 30 and Article XI § 5 of the CONSTITUTION OF THE STATE OF IOWA:

Articles III § 30: "I do solemnly swear, or affirm, (as the case may be,) that I will support the constitution of the United States, and the constitution of the state of Iowa, and that I will faithfully discharge the duties of senator, (or representative, as the case may be,) according to the best of my ability."

XI § 5: "Every person elected or appointed to any office, shall, before entering upon the duties thereof, take an oath or affirmation to support the Constitution of the United States, and of this State, and also an oath of office."

representing himself to be or assuming to act as such, under color or pretense of office or employment commits or attempts an act of extortion, shall be fined under this title or imprisoned not more than three years, or both; but if the amount so extorted or demanded does not exceed \$1,000, he shall be fined under this title or imprisoned not more than one year, or both.

⁶ A human being, naturally born, versus a legally generated juridical person.

- **Definition of Extortion:** “Oppression under color or right; the criminal offense of obtaining money or other valuable thing⁷ by compulsion, actual force, or force of motives applied to the will; more technically defined as the unlawful taking by an officer of the law, by color of his office, of any money or thing of value that is not due to him, or the taking of more than is due, or the taking of money before it is due.” *Bush v State*, 19 Ariz 195, 168 P 508; 31 Am J2d Extort § 1 (Black’s Law Dictionary 10 ed.).

JURISDICTION AND VENUE

There are in-state and out-of-state defendants. In-state defendants swore Oaths of Office, under penalty of perjury, to uphold both the Constitution of the State of Iowa and the Constitution of the United States, and the laws therein. Out-of-state defendants, who, by broadcast, entered into the jurisdiction of the United States District Court’s Southern District Iowa, which holds personal jurisdictions over such defendants, due to long arm statutes.

PARTIES

The following co-conspirators, many of whom are members and/or are affiliated, officially and/or unofficially, with the **racketeering**-influenced corrupt organization REPUBLICAN PARTY OF IOWA⁸ and/or the racketeering-influenced corrupt organization REPUBLICAN NATIONAL COMMITTEE, performed a sworn declaration (“Constitutional Oaths”) to faithfully uphold the Constitution of the United State and the laws of the United States, with in-state parties swearing Oaths also to uphold both the Constitution of the State of Iowa and the laws thereof.

Natural person who, acting under **color of authority** as “President of the United States of America”, performed defamation and caused **continuing legal injury** to a class of persons; although defamation is civil in nature,

1. **Donald J. Trump** – On January 20, 2025, Mr. Trump swore the following oath in accordance with Article II, Section I of the U.S. Constitution: “I do solemnly swear (or affirm) that I will faithfully execute the Office of President of the United States, and will to the best of my ability, preserve, protect and defend the Constitution of the United States.”

⁷ “Valuable thing” includes rights.

⁸ Although

Natural person who, acting under color of authority as “Governor of the State of Iowa”, violated the rights and caused continuing legal injury to a class of persons:

2. Kim Reynolds – On January 13, 2023, Ms. Reynolds swore the following oath in accordance with [Art/Sec] of the CONSTITUTION OF THE STATE OF IOWA, “I, Kimberly K. Reynolds, do solemnly swear or affirm that I will support the Constitution of the United States, and the Constitution of the State of Iowa, and that I will faithfully and impartially, to the best of my knowledge and ability, discharge the duties incumbent upon the office of governor in the state of Iowa, as now or hereafter required by law,” (Des Moines Register, January 13, 2023).

Natural persons who, acting under color of authority as “Attorney General” and Assistant Attorney General”, violated the rights and caused continuing legal injury to a class of persons:

3. Brenna Bird – On January 3, 2023.
<https://www.iowaattorneygeneral.gov/newsroom/brenna-bird-formally-sworn-in-as-iowa-attorney-general>
4. Christopher Deist –

Natural persons who, acting under color of authority as “State Senators” within the Legislative Assembly, violated the rights and caused a continuing legal injury of a class of persons:

5. Kevin Alons –
6. Mike Bousselot –
7. Doug Campbell –
8. Mark Costello –
9. Dan Dawson –
10. Rocky De Witt –
11. Adrian Dickey –
12. Dawn Driscoll –
13. Lynn Evans –
14. Julian Garrett –
15. Jesse Green –

16. Kerry Gruenhagen –
17. Dennis Guth –
18. Mike Klimesh –
19. Carrie Koelker –
20. Tim Kraayenbrink –
21. Mark Lofgren –
22. Charlie McClintock –
23. Mike Pike –
24. Jeff Reichman –
25. David Rowley –
26. Ken Rozenboom –
27. Sandy Salmon –
28. Jason Schultz –
29. Annette Sweeney –
30. Tom Shipley –
31. Dave Sires –
32. Jeff Taylor –
33. Kara Warne –
34. Scott Webster –
35. Cherielynn Westrich –
36. Jack Whitver –

37. Dan Zumbach –

38. Jerry Behn –

Natural persons who, acting under color of authority as “State Representatives” within the Legislative Assembly, violated the rights and caused legal injury to a class of persons:

39. Brett Barker –

40. David Blom –

41. Jane Bloomingdale –

42. Brooke Boden –

43. Jacob Bossman –

44. Steven Bradley –

45. Mark Cisneros –

46. Taylor Collins –

47. Tom Determann –

48. Zach Dieken –

49. Jon Dunwell –

50. Samantha Fett –

51. Dean Fisher –

52. Jason Gearhart –

53. Dan Gehlbach –

54. Thomas Gerhold –

55. Cindy Golding –

- 56. Pat Grassley –
- 57. Bill Gustoff –
- 58. Helena Hayes –
- 59. Robert Henderson –
- 60. Christian Hermanson –
- 61. Steven Holt –
- 62. Heather Hora –
- 63. Thomas Jeneary –
- 64. Craig Johnson –
- 65. Megan Jones –
- 66. Bobby Kaufmann –
- 67. Barb Kniff McCulla –
- 68. Shannon Latham –
- 69. Judd Lawler –
- 70. Shannon Lundgren –
- 71. Joshua Meggers –
- 72. Ann Meyer –
- 73. Gary Mohr –
- 74. Tom Moore –
- 75. Carter Nordman –

- 76. Matthew Rinker –
- 77. Mike Sexton –
- 78. Jeff Shipley –
- 79. Brent Siegrist –
- 80. Travis Sitzmann –
- 81. Jennifer Smith –
- 82. Ray Sorensen –
- 83. Henry Stone –
- 84. Mark Thompson –
- 85. Charley Thomson –
- 86. Mike Vondran –
- 87. Ryan Weldon –
- 88. Sam Wengryn –
- 89. Skyler Wheeler –
- 90. Craig Steven Williams –
- 91. John Wills –
- 92. Hans Wilz –
- 93. Matt Windschitl –
- 94. Devon Wood –
- 95. Derek Wulf –

96. David Young –

Racketeering-Influenced Corrupt Organizations who violated RICO Laws:

97. REPUBLICAN PARTY OF IOWA –

98. REPUBLICAN NATIONAL COMMITTEE –

Other parties:

99. John and Jane Doe(s), *et al.*

LIMITATIONS PERIOD

U.S. Attorneys

Resources

U.S. Attorneys' Manual

Criminal Resource Manual

CRM 500-999

Criminal Resource Manual 601-699

652. Statute of Limitations for Conspiracy

Conspiracy is a *continuing offense*. For statutes such as 18 U.S.C. § 371, which require “an overt act in furtherance of the conspiracy”, the statute of limitations begins to run on the date of the last overt act. [7]

Section 3282 of Title 18, United States Code states that, “prosecution for a non-capital offense shall be instituted within five years after the offense was committed.” [8]

Glossary of Terms

Color of law crimes –

- **color** – appearance, guise, or semblance; especially, the appearance of a legal claim to a right, authority, or office <color of title> <under color of state law> (Black's Law Dictionary 10th ed.).

An apparent legal right; a seeming legal right; the mere semblance of a legal right. Although they may also refer to activity by private persons, terms such as color of authority, color of law, and color of right generally refer to actions taken by a representative of government (EXAMPLES: a police officer; a civil servant; any public official) which are beyond the authority granted by the law to his position or office, but which appear to be legal because of his official status. In many circumstances the government will be held responsible for such conduct even though it was unauthorized. If a deprivation of constitutional rights is involved, such conduct may also violate the Civil Rights Acts (Ballantine's Law Dictionary Legal Asst. ed.).

color of law – the appearance or semblance, without the substance, of a legal right. The term usually implies a misuse of power made possible because the wrongdoer is clothed with the authority of the state. State action is synonymous with color of [state] law in the context of federal civil-rights statutes or criminal law. (Black's Law Dictionary 10th ed.).

color of office – The authority or power that is inherent in an office, especially a public office. Acts taken under the color of an office are vested with, or appear to be vested with, the authority entrusted to that office (Black's Law Dictionary 10th ed.).

An expression for acts performed by an officer which are entirely outside of or beyond the authority conferred by the office. *Haffner v United States Fidelity & Guaranty Co.* 35 Idaho 517, 207 P 716; *Wilson v Fowler*, 88 Md 601, 42 A 201 (Ballentine's Law Dictionary 3rd ed.).

An expression for acts performed by an officer that are outside of the authority conferred by her office (Ballantine's Law Dictionary Legal Asst. ed.).

color of authority – the appearance or presumption of authority sanctioning a public officer's actions. * The authority derives from the officer's apparent title to the office or from a writ or other apparently valid process the officer bears (Black's Law Dictionary 10th ed.).

Authority derived from an election or appointment, however irregular or informal, so that the incumbent is not a mere volunteer. *State ex rel. Brockmeier v Ely*, 16 ND 569, 113 NW 711 (Ballentine's Law Dictionary 3rd ed.).

Authority derived from an election or appointment (Ballentine's Law Dictionary Legal Asst. ed.).

Conspiracy –

- **conspiracy** – an agreement between two or more persons to accomplish together a criminal or unlawful act or to achieve by criminal or unlawful means an act not in itself criminal or unlawful. 16 Am J2d Consp § 1. Conspiracy is a criminal offense, a misdemeanor in some jurisdictions, a felony in others. 16 Am J2d Consp §§ 2, 3. Conspiracy is also a wrong which will constitute a cause for a civil action. 16 Am J2d Consp § 43. The cause of action is the damage suffered. it is the civil wrong resulting in damage, and not the conspiracy which constitutes the cause of action. *Mox, Inc. v Woods*, 202 Cal 675, 262 P 302 (Ballentine's Law Dictionary 3rd ed.).

A combination or confederacy between two or more persons formed for the purpose of committing, by their joint efforts, some unlawful or criminal act, or some act which is innocent in itself, but becomes unlawful when done by the concerted action of the conspirators, or for the purpose of using criminal or unlawful means to the commission of an act not in itself unlawful. Conspiracy is a consultation or agreement between two or more persons, either falsely to accuse another of a crime punishable by law; or wrongfully to injure or prejudice a third person, or any body of men, in any manner; or to commit any offense punishable by law; or to do any act with intent to prevent the course of justice; or to affect a legal purpose with a corrupt intent, or by improper means (Black's Law Dictionary 2nd ed.).

An agreement by two or more persons to commit an unlawful act, coupled with an intent to achieve the agreement's objective, and (in most states) action or conduct that furthers the agreement; a combination for an unlawful purpose. 18 USCA § 371. Conspiracy is a separate offense from the crime that is the object of the conspiracy. A conspiracy ends when the unlawful act has been committed or (in some states) when the agreement has been abandoned. A conspiracy does not automatically end if the conspiracy's object is defeated. See Model Penal Code § 5.03(7); *U.S. v. Jiminez Recio*, 537 U.S. 270, 123 S. Ct. 819 (2003). — aka *criminal conspiracy* (Black's Law Dictionary 10th Ed.).

conspirator – Someone who takes part in a conspiracy (Black's Law Dictionary 10th Ed.).

co-conspirator – Someone who engages in a criminal conspiracy with another; a fellow conspirator. — aka *coconspirator*.

coconspirator's exception – An exception to the hearsay rule whereby one conspirator's acts and statements, if made during and in furtherance of the conspiracy, are admissible against a codefendant even if the statements are made in the codefendant's absence. See Fed. R. Evid. 801(d)(2)(E). — aka *coconspirator's rule* (Black's Law Dictionary 10th Ed.).

The rule of evidence that statements made by a person involved in a conspiracy may be used as evidence of the guilt of all the conspirators (Ballentine's Law Dictionary Legal Asst. Ed.).

Injury to rights –

- **continuing injury** – an injury still in the process of being committed.
- **injury** – the violation of another’s legal right, for which the law provides a remedy; a wrong or injustice (Black’s Law Dictionary 10th edition).

The invasion of a legal right. *Bowman v Davenport*, 243 Iowa 1135, 53 NW2d 249, 63 ALR2d 853.

To be distinguished from “damage,” which is the loss, hurt, or harm resulting from the “injury.” 22 Am J2d Damg § 1 (Ballentine’s Law Dictionary 3rd Ed.).

The invasion of a legal right; an actionable wrong done to a person, her property, or her reputation. (Compare “damage,” which is the loss, hurt, or harm resulting from “injury.”) Note that an injury, as the law uses that term, is not limited to physical harm done to the body; note too that, in the language of the law, an injury to the body (that is, a personal injury) may mean death as well as mere physical harm.

- **legal injury** – an invasion or violation of a legal right (Ballentine's Law Dictionary Legal Asst. Ed.).
- **Ninth Amendment of the Constitution of the United States** – “The enumeration in the Constitution of certain rights shall not be construed to deny or disparage others retained by the people.” This wording establishes the existence of **unenumerated rights**.
- **unenumerated rights** – a right retained by the people but not explicitly mentioned in the Bill of Rights – aka *implied right*.

Person –

- **natural person** – A human being (Black’s Law Dictionary 10th ed.).

A human being, naturally born, versus a legally generated **juridical person** (Black’s Law Dictionary 2nd ed.).

- **juridical person** – entity, as a firm, that is not a single natural person, as a human being, authorized by law with duties and rights, recognized as a legal authority having a distinct identity, a legal personality. Also known as an **artificial person**, juridical entity, juristic person, or legal person. Also refer to body corporate (Black’s Law Dictionary 2nd ed.).

Racketeer Influenced Corrupt Organizations Act (RICO) –

- **racketeering** – A pattern of illegal activity carried out as part of an enterprise (such as a crime syndicate) that is owned or controlled by those engaged in the illegal activity. * See 18 USCA §§ 1951-1960

- **racketeer** – *noun*. someone who engages in racketeering; specifically, someone who earns money from organized crime. — racketeer, *verb* (Black's Law Dictionary 10th Ed.).

Using one's position, especially a position as officer..., to extort or obtain money by fraud. *Hazellon v Murray*, 21 NJ 115, 121 A2d 1.

The organized use of threats, coercion, intimidation, and violence to compel the payment or for actual or alleged services of arbitrary or excessive charges under the guise of membership dues, protection fees, royalties, or service rates. *United States v McGlone* (DC Pa) 19 F Supp 285, 286 (Ballentine's Law Dictionary 3rd Ed.).

A gangster; a person engaged in criminal activity as a business. The term is often associated with organized crime. It suggests a person whose criminal enterprises involve the use of threats, coercion, intimidation, and violence, especially for purposes of extortion and protection (Ballentine's Law Dictionary Legal Asst. Ed.).

- **racket** – An organized criminal activity; especially, the extortion of money by threat or violence.
- **Racketeer Influenced Corrupt Organizations Act** – A 1970 federal statute designed to attack organized criminal activity and preserve marketplace integrity by investigating, controlling, and prosecuting persons who participate or conspire to participate in racketeering. 18 USCA §§ 1961-1968. * The federal RICO statute applies only to activity involving interstate or foreign commerce. Many states have adopted similar statutes, sometimes called "little RICO" acts. The federal and most state RICO acts provide for enforcement not only by criminal prosecution but also by civil lawsuit, in which the plaintiff can sue for treble damages (Black's Law Dictionary 10th Ed.).

A federal statute, commonly referred to as RICO, which criminalizes racketeering that affects interstate commerce or persons or businesses engaged in interstate commerce. [2]

"Before criminal or civil liability can attach under RICO, it must be shown that the two or more acts of racketeering alleged in the criminal indictment or civil complaint constitute a pattern of racketeering activity on the part of the culpable person. The statutory definition of pattern 'requires at least two' predicate acts occurring within ten years of each other, with one of them occurring after October 15, 1970. More broadly put, the pattern of racketeering activity is a scheme of unlawful conduct with a nexus to both the culpable person and the enterprise," (McCormick 1998). [3]

The federal Racketeering Influenced and Corrupt Organizations (RICO) law was passed in 1970 as the "ultimate hit man" in mob prosecutions. Prior to RICO, prosecutors could only try mob-related crimes individually. Since different mobsters perpetrated each crime, the government could only prosecute individual criminals instead of shutting down an entire criminal organization. Today, the government rarely uses RICO against the

Special Message to the Public from Documents-Drafter Sondra Wilson

Court documents pertaining to case # 4:25-cv-00116-SHL-WPK (make a free account on PACER.UScourts.gov to view the Docket (case file) are being broadcast for First Amendment purposes. For frequent updates, click “Operation: Magna Carta II” under the “Events” menu on www.WildWillpower.org, or use this direct link: <https://wildwillpower.org/events-2/spring-summer-2025-operation-magna-carta-ii>.

This entire process, including the broadcasting of behind-the-scenes *peaceable assembling* (see First Amendment) of Court documents, is being done so in accordance with the Fair Use Doctrine and in Loving Memory of Sybil Ludington, her horse “Star”, Paul Revere, and United States Veterans, past and present, many of whom were killed defending the rights that so many today take for granted.

Here at Wild Willpower PAC (www.WildWillpower.org), part of our goal is to remind The People that the First Amendment does not cover hate speech or bullying, because those two activities directly violate the “Promote the General Welfare and Mutual Defense” provision within the Preamble of the United States Constitution: any Supreme Court ruling which states otherwise likely did not have this particular information brought before the Court.

Therefore, with expediency caused by a strong sense of urgency due to ongoing local, statewide, national, and international threats, Wild Willpower is spreading the news and informing The People about Operation Magna Carta II. Please help spread the word, and if you believe in the work we are doing and want it to succeed, please consider offering a campaign co-contribution: offering money in such a manner, for legitimate First Amendment purposes, may be done “as a form of expression” protected under U.S. Supreme Court ruling *Buckley v. Valeo* (1976).

“The sacred rights of (human)kind are not to be rummaged for, among old parchments, or musty records. They are written, as with a sun beam, in the whole volume of human nature, by the hand of the divinity itself; and can never be erased or obscured by mortal power.”

– Alexander Hamilton, *The Farmer Refuted* (1775)

Thank you for your support, and thank you, Veterans, and for keeping us safe, protecting our rights, and protecting the rights of people for generations to come!

Sincerely,

Sondra Wilson (WildWillpowerPAC@gmail.com)
on behalf of everyone at Wild Willpower, past, present, and future

Mafia. Instead, because the law is so broad, both governmental and civil parties use it against all sorts of enterprises, both legal and illegal.

RICO allows for prosecution of all individuals involved in a corrupt organization. For mob prosecutions, that means that the government can go after top leadership as well as the hit men and capos. And RICO established much enhanced sentences, as well. John L. Smith described the impact of RICO in an article for the Las Vegas Review-Journal: "After RICO, mob families began to crack under the very real threat that members and associates could be indicted en masse for a wide range of criminal activity. ... [E]ven the strongest stand-up guy would have trouble fading the 20-year (and more) sentences that began accompanying RICO convictions."

While RICO was originally aimed at the Mafia, over the past 37 years, prosecutors have used it to attack many forms of organized crime: street gangs, gang cartels, corrupt police departments and even politicians.

Criminal RICO

To violate RICO, a person must engage in a pattern of racketeering activity connected to an enterprise. The law defines 35 offenses as constituting racketeering, including gambling, murder, kidnapping, arson, drug dealing, bribery. Significantly, mail and wire fraud are included on the list. These crimes are known as "predicate" offenses. To charge under RICO, at least two predicate crimes within 10 years must have been committed through the enterprise.

Note that an enterprise is required. This might be a crime family, a street gang or a drug cartel. But it may also be a corporation, a political party, or a managed care company. The enterprise just has to be a discrete entity; but an enterprise is not the same as an individual. Thus, a corporation may be the enterprise through which individuals commit crimes, but it can't be both an individual and the enterprise.

The criminal RICO statute provides for prison terms of 20 years and severe financial penalties. The law also allows prosecutors to attach assets, so they can't be whisked out of the country before judgment (JUSTIA).

Transgetransgender Iowans. Violation of the rights of transgender Iowans is part of a larger conspiracy to cause injury to a class of persons henceforth referred to as **transgender Americans**.

REFERENCES

Notice: Ballentine's Law Dictionary and Black's Law Dictionary are federally-recognized, credible law dictionaries, recommended on the US Court of Federal Claims' official website: <https://www.uscfc.uscourts.gov/pro-se-information>.

Ballantine's Law Dictionary 3rd Ed. by James A. Ballantine (James Arthur 1871-1949). Edited by William S. Anderson. © 1969 by THE LAWYER'S CO-OPERATIVE PUBLISHING COMPANY. Library of Congress Catalog Card No. 68-30931.

Ballantine's Law Dictionary Legal Asst. Ed. by Jack Ballantine (James Arthur 1871-1949). Doctored by Jack G. Handler, J.D. © 1994 Delmar by Thomson Learning. ISBN 0-8273-4874-6.

Black's Law Dictionary 2nd Ed. Black, Henry Campbell. <https://thelawdictionary.org/>.

Black's Law Dictionary Deluxe 10th Ed. by . Black, Henry Campbel and Garner, Bryan A. ISBN: 978-0-314-62130-6.

Des Moines Register. (January 13, 2023). *Kim Reynolds has been sworn in for a second 4-year term as governor. Here's what to know.* Stephen Gruber-Miller.
<https://www.desmoinesregister.com/story/news/politics/2023/01/13/kim-reynolds-inauguration-iowa-governor-sworn-in-legislature-caucus/69731285007/>.

Governor Kim Reynolds. (Friday, February 28, 2025). *Press Release: Gov. Reynolds releases statement on signing SF 418.* Official State of Iowa Website.
<https://governor.iowa.gov/press-release/2025-02-28/gov-reynolds-releases-statement-signing-sf-418>.


JUSTIA. *Racketeering Influenced Corrupt Organizations (RICO) Law.* Criminal Law Center.
<https://www.justia.com/criminal/docs/rico/>.

McCormack, David R. (1998). Racketeering Influenced Corrupt Organizations § 1.04, at 1-20.

Medicaid and Medicare Act. *Your Rights.*
<https://www.medicare.gov/basics/your-medicare-rights/your-rights>.

Witness Complaints

Caryll Steen



A hand-drawn diagram of a cell. It features a large, irregular outer boundary representing the cell membrane. Inside, there is a smaller, roughly circular structure labeled 'Nucleus' with a central dot. To the right of the nucleus is a large, oval-shaped structure labeled 'Vacuole'. Arrows point from the labels to their respective structures.

HELP Victim turned
x Sandra Wilson 777 @ gmalt
PACED Prosecution Case

Willow Power AC Co
Gm. Co. Inc.

Rightful Master
of Cards + Cages

Wild Will power. 9809
connected to to
Complaint S

Sandra Wilson
LA 50014

Arnes, LA 50014

28