

LOTL QUARTERLY 2025B (APRIL-JUNE 2025)

“Life on The List” (LOTL) Newsletter is a quarterly newsletter with legal news & relevant info for those forced to register upon release, or those new to life as a person forced to register. Comments & inquiries should be sent to: Derek Logue, OnceFallen.com, 2211 CR 400, Tobias NE 68453

NOTE FROM THE PUBLISHER: On 9/30/2024, Corrlinks changed the ability to send out mass emails, ending numerous newsletters including our own ICoN. This newsletter is a rebranding, as the “Co” in ICoN stood for Corrlinks. The LOTL Quarterly will be published every 3 months on the 15th day of the month (March, June, Sept., and Dec.), covering topics of the previous 3 months. Every LOTL Quarterly will be exactly 10 pages because it can fit on 5 sheets of double-sided paper so that it can be printed & mailed to most facilities in a single envelope. It will still contain legal rulings & legislative updates & articles of interest for those forced to register upon release. Our focus remains post-release issues. We will still answer letters & take article ideas & submissions from readers.

LEGAL NEWS

Does v. Whitmer, Case 2:22-cv-10209-MAG-CI (ED MI, 3/26/25): Judge Mark A. Goldsmith of the U.S. District Court for the Eastern District of Michigan ruled on a class action brought by the ACLU of Michigan that the state can’t enforce the entirety of its 2021 version of the law against offenders who committed their crimes before July 1, 2011. He gave the legislature 90 days to rewrite its laws. Among the many just findings in this decision, the Court found that the registry is punishment! DISCLAIMER! This does not completely eliminate the requirement to register. This merely means that certain provisions that were introduced to the state’s SORA in 2021 cannot be enforced, but the registry itself continues to be enforced. The MI registry was established in 1995; only convictions before this date are excluded from the MI SORA.

US v Anderegg, Case: 3:24-cr-00050-jdp (WD WI, 2/13/2025): Defendant is charged with for federal charges related to creating, possessing, and distributing AI generated images of minors considered obscene to a minor. The other charges were upheld, but the charge of possession of AI-generated images was declared unconstitutional as the images were not of real minors. SCOTUS has held that the First Amendment protects the right to possess obscene material in one’s own home, *Stanley v. Georgia*, 394 U.S. 557 (1969), so long as it’s not actual CSAM, *Osborne v. Ohio*, 495 U.S. 103 (1990). More recently, the Court held that the First Amendment also protects “virtual” CSAM that does not involve any actual children, *Ashcroft v. Free Speech Coalition*, 535 U.S. 234 (2002). At the least, possessing created images of minors, as they are not real. This was extended to images created by an AI program. Again, this only applies to the act of merely possessing AI-generated images, not distributing or creating them.

In re Harder, No. 368645, 2025 WL 825907 (Mich. Ct. App. 2025): Harder was convicted and required to register in Iowa and subsequently released from his Iowa registration obligation. A Michigan resident, he later sought removal from the Michigan registry. The court of appeals rejected his several arguments in support of removal.

1. The court concluded that Harder’s Iowa conviction was “substantially similar” to a registerable Michigan offense, rejecting a “strictly categorical” comparative approach (favored by federal courts). “[S]light variations in elements do not relieve a person convicted as a sex offender in another state from registration requirements when the substance of the Michigan and out-of-state offenders is substantially the same.”
2. The court held that the Full Faith and Credit Clause does not require that the State of Michigan defer to Iowa’s de-registration outcome because the respective state requirements “are independent of one another.” The court reasoned that Harder’s Michigan registration requirement stemmed from his Iowa conviction—not his Iowa registration requirement. “An Iowa court may not modify the terms of application of Michigan’s SORA through a decision regarding the enforcement of Iowa’s sex offender registry laws.”
3. The court rejected Harder’s argument that continued Michigan registration was cruel and unusual punishment. This was because registration does not qualify as punishment. Fourth, the court refused to grant relief based on Harder’s equal protection claim, rejecting his argument that registration infringed his right to interstate travel and that he was wrongly not afforded a statutory right to petition for removal, reasoning that the state’s regime satisfied rational basis standard of review.
4. The court also rejected three unpreserved constitutional claims: ex post facto, vagueness, and due process. Like the cruel and unusual punishment claim, the ex post facto claim was rejected because the registration

requirements are not criminal punishment (and therefore not subject to ex post facto analysis). The vagueness claim failed because the statute provided fair notice of the proscribed conduct and because the statute "does not lend itself to more than one interpretation, let alone one that would allow a trial court to arbitrarily decide whether two crimes are substantially similar." Finally, the court rejected the due process claim because Harder was heard before the trial court, which is a neutral body, and because the trial court conducted its own analysis and "did not merely rubberstamp the decision of the State Police."

State v. Korson, No. 2D2024-0807, 2025 WL 908609 (Fla. Ct. App. 2025): In 1992, Korson pleaded guilty to sexual battery and after serving a state prison term, successfully completed probation in 1999. At that time, state law allowed individuals to petition for registry removal after twenty years. In 2023, Korson, having been registered for twenty years, filed a petition for removal. Before Korson petitioned, the registry removal provisions had been amended to extend the registration period to twenty-five years and to preclude petition by individuals convicted of particular offenses, including the offense for which Korson was convicted. State district court agreed with Korson. Appeals court dismissed the state's appeal, noting that had no jurisdiction to grant the state's petition for writ of certiorari because registration matters are part of a criminal proceeding, and not a separate civil matter. While this uphold's Korson's relief from the registry, the court also noted that registry removal provisions at issue in the case are procedural, not substantive, and therefore should be applied retroactively by trial courts.

U.S. v. Gomez, 129 F.4th 954 (6th Cir. 2025): Ruled that the trial court acted properly in increasing the offense level score of Gomez under the federal sentencing guidelines when he "committed" a sex offense against a minor while in a failure-to-register status. Gomez need not have been convicted of the sexual offense for the increase to be lawful. See U.S.S.G. sec. 2A3.5(b)(1)(c) (providing enhancement "if, while in a failure to register status, the defendant committed...a sex offense against a minor")

Henry v. Sheriff of Tuscaloosa County, et al., Case: 24-10139 (11 Cir. 2025); Three judge panel that Alabama cannot completely prohibit Registered Persons from cohabitating with minors. Alabama Code § 15-20A-11(d)(4) prohibits those with offense involving a child from "resid[ing] or conduct[ing] an overnight visit with a minor," including their own child. No exceptions. "Section 15-20A-11(d)(4) fails strict scrutiny because, by being overinclusive, underinclusive, and more restrictive than other effective alternatives, it is not narrowly tailored to advance the government's compelling interest."

US v. Volungus, 2025 WL 1111531 (1st Cir. 2025): Petitioner, a federal involuntary committee, challenged non-treatment conditions imposed upon his conditional release (e.g., to not own and operate a computer with internet access), under the terms of the Adam Walsh Act. Noting that a federal circuit split exists on the issue, the Court sides with the majority view, holding that non-treatment conditions can be imposed.

People v. Morrison, 2025 WL 1098821 (Cal. Ct. App. 2025): Petitioner argued that the state law's failure to require a personal jury trial advisement and waiver, unlike statutes governing trials for other types of civil commitment, violated the federal Equal Protection Clause. The principal issue raised was the level of scrutiny to be applied. The Court concluded that the petitioner's equal challenge was subject to a rational basis (not strict scrutiny) standard of review. Because petitioner did not raise the issue in the trial court, the Court conditionally affirmed his commitment order and remanded the matter to provide him the opportunity to raise his equal protection claim before the trial court.

Pennington v. Taylor, 2025 WL 957541 (M.D. Ala. 2025): Section 1983 action seeking injunctive relief brought by two individuals who when children were convicted as adults, and subsequently subject to SORN, requiring lifetime registration without individual determination of risk. They lodged Eighth Amendment, Ex Post Facto, Procedural Due Process, and Equal Protection challenges, as well as right to reputation under the state constitution. The Court dismissed the case because the Court determined that the claim was untimely because it was lodged after the lapse of the two-year statute of limitations for a 1983 claim (based on state law). The Court concluded that the claim accrued in July 2011, when petitioners were designated as adults under SORN, and therefore had to be filed by July 2013 (not September 2019, when it was filed). The Court reasoned that petitioners suffered a "continuing injury," not a "continuing violation," and only the latter would extend the statute of limitations.

LEGISLATIVE NEWS

Death Penalty for s*x offenses not involving murder: Expanding on the bad idea championed by FloriDUH Republican Ron DEATHsantis, during his failed 2024 presidential campaign, there are a few states seeking to pass the death penalty for s*x offenses not involving a murder element in 2025. (Florida has passed the death penalty statute in 2023, while Tennessee passed a death penalty statute in 2024.) Please note that even if a bill failed to pass, in most instances, the legislative session ended before the bill could fully pass; we shall likely see it again next year, OR it could advance in a special legislative session:

- Alabama HB49: Would require any person age 18 or older convicted of rape in the first degree or sodomy in the first degree of a victim less than age six to be sentenced to death or life without parole. If the person convicted is less than age 18 then they would be sentenced to either life without parole or life. (Was advancing but was not passed before the end of session)
- Arkansas SB 375: Makes offenses against minors age 13 or younger a capital offense, particularly if there is a threat or an effect of serious harm. (Signed into law)
- Idaho HB 380: Makes the charge of “aggravated lewd conduct with children age 12 and younger” a death penalty offense (signed into law)
- Kentucky HB199: Would make rape in the first degree, sodomy in the first degree, and sexual abuse in the first degree capital offenses when the victim is under 12 years old. On a related note, HB 442 would expand aggravating circumstances for determining death penalty eligibility to include sexual abuse of a corpse. (Failed)
- Mississippi HB 1336: Would make rape of a child under 12 years old that damages the child's sexual organs a death-eligible offense. (Died in committee)
- Missouri SB 196: Would make statutory rape in the first degree and sexual trafficking of a child in the first degree death-eligible crimes. If enacted, it would only apply to offenses committed on or after August 28, 2025. (Clock may have run out, but it was advancing)
- Oklahoma SB 599: Makes offenses against anyone under age 14 a capital offense, even if this is a first time offense or the victim was a willing participant. (Signed into law)
- Virginia HB 2694: Would reinstate the death penalty for capital murder and rape, forcible sodomy, and object sexual penetration when the victim is a child younger than the age of 13 and the offender was 18 years of age or older at the time of the offense and is not intellectually disabled. (Failed to pass)
- In general, Connecticut, Illinois (failed) New Jersey, New York, West Virginia all filed legislation to reinstate the death penalty in general, while Arizona, Delaware, Indiana, Kansas, Kentucky, Missouri, Nebraska, North Carolina, Ohio, Oregon, and Texas all have bills proposing abolishing the death penalty in most or all cases.

The website Death Penalty Info has a page on this topic. Link—

<https://deathpenaltyinfo.org/facts-and-research/background/crimes-punishable-by-death/death-penalty-for-child-sexual-abuse-that-does-not-result-in-death>

There have been several other changes to the law since Your Life on The List: 4th Edition was released, as well as making clarifications on confusing points of law. Below are changes you may wish to add to the book:

- AL: Two recent cases won by Registered Persons could repeal some or all residency restrictions specific to living with a minor, if upheld on appeal; In *McGuire v. Marshall*, Case 2:19-cv-00174-WKW-JTA (MD AL 2024), a US District judge found that the state’s residency restrictions and overnight visit with minors ban violated the 1st Amendment; and in *Henry v. Sheriff of Tuscaloosa County, et al.*, Case: 24-10139 (11 Cir. 2025) a three judge panel that Alabama cannot completely prohibit Registered Persons from cohabitating with minors. Also noted that some municipal residency restrictions exist in the state that expands distance or restricted areas. Act 2025-201 added new employment bans on working or volunteering as a first responder.
- AR: Amended presence restrictions to read, “Levels III & IV cannot “knowingly enter within 100 feet of” a water park (re. aquatic facility with a wave pool, splash pad, water slide, or other area dedicated to aquatic activities for children run open to the general public), swimming area, or children’s playground contained within a public park. ACA §5-14-134/Act 158 (2025)”; ACA §27-16-819 (Act 984 (2025)) requires a mark to be placed on the state ID/DLs of RPs listed as a Level 3 or 4

- FL: Updates to info on local ordinances, a ruling on state ID card laws & other info from a 2024 state gov't report, as well as adding info on which counties have certain ordinances (Halloween restrictions, segregated emergency shelters)
- GA: Revised info on fees, i.e., there is no more formal statewide fee but local LE are still charging RPs; clarified a couple of points where a reader was confused by the wording, specifically, that while GA is not reportedly following the 21-day advance notice for international travel, reporting ANY travel is stillexpected.
- IN: Employment restrictions, added: "As of 7/1/2025: Prohibits a sexually violent predator or an offender against children from working in any setting where the predator or offender: (1) has more than incidental and occasional contact with a child who is not accompanied by the child's parent, guardian, or custodian; (2) has supervisory or disciplinary power over a child; or (3) is expected to touch a child on a more than incidental and occasional basis. (IC 35-42-4-10, as amended by Act No. 1687 (2025))
- ❖ ME: Added clarification to residency restrictions; while the state allows municipal residency restriction ordinances to be made, they "may not impose additional restrictions or requirements, including, but not limited to, registration and fees." The bans can apply to: (1) A public or private elementary, middle or secondary school; (2) a municipally owned or state-owned park, athletic field or recreational facility that is open to the public where children are the primary users; or (3) a municipally owned or state-owned property leased to a nonprofit organization for purposes of a park, athletic field or recreational facility that is open to the public where children are the primary users.
- MS: Clarified rules on visiting the state w/o registering (staying in the state 7 aggregate days in a 6 month period is considered establishing "temporary" residence, 14 days considered "permanent" residence; staying in any location between 10pm and 6am for 7 consecutive days also triggers registration). MS passed no new laws requiring changes in the info listed here for 2025
- NE: Clarified confusion regarding residency restriction laws. NE allows municipalities to make restrictions of up to 500 ft but limits application to those with "aggravated offenses" against minors.
- UT: Notice that registry fees will increase by law on 7/1/2026; unlike previous statutes setting the fee, the fee will be set by the registration agency.
- WA: Minor changes to the comment area that the pullover law was expanded beyond sex offenses.
- WI: Added note under community notification that WI uses the term "Special Bulletin Notice" in relation to those subject to community notification.
- WA: Ch. 166, Laws of 2025 revised the parental rights section, which includes a statement that SVPs are automatically barred from parental/visitation rights.
- WV: \$125 annual fee starting 7/1/2025 (See HB3164, which amends WVC §15-12-2 to include the fees)
- WY: New provisions to parental rights laws-- In granting a divorce, separation or annulment of a marriage or upon the establishment of paternity pursuant to W.S. 14-2-401 through 14-2-907, the court may make by decree or order any disposition of the children that appears most expedient and in the best interests of the children. In determining the best interests of the child, the court shall consider, but is not limited to, the following factors...Whether either parent has a conviction for which the parent must register. (WY Stat. §20-2-201(x)). When considering an order for visitation, there shall be a rebuttable presumption that it is not in the best interests of a child to grant unsupervised visitation to a parent who is required to register. WY Stat. §20-2-202.(b)

GEORGIA INMATE RAN REGISTRY SCAM FROM PRISON

A Georgia man is in McKean County Jail, charged for allegedly impersonating a cop to scam a Registered Person out of \$1,000. Rashawn Ariel Scott, 33, of Claxton, Ga., is charged with identity theft, a third-degree felony; theft by deception, theft by unlawful taking, theft by extortion and receiving stolen property, all first-degree misdemeanors; impersonating a public servant, a second-degree misdemeanor; and furnishing false information, a third-degree misdemeanor. According to the criminal complaint, on 08/23/2022, a man listed on the Pennsylvania registry went to the PA state police barracks and attempted to give two gift cards to the police communications officer. He said he was told to bring the cards to the barracks. He had threatened the Registrant with arrest; he had the person stay on the line, go to a store and buy prepaid credit cards, and give him the card info over the phone. Scott was transferred to the jail from the Georgia DOC; Scott has been incarcerated since 2014 for racketeering, aggravated assault, and weapons charges, with a maximum release date of 09/26/2028. (Source: Marcie Schellhammer. "Georgia man jailed in McKean Co. for alleged scam against registered sex offender." Olean Times Herald. 3 Apr 2025.

https://www.oleantimesherald.com/news/georgia-man-jailed-in-mckean-co-for-alleged-scam-against-registered-sex-offender/article_4d2eb529-982b-4d58-90a2-869b90c59aad.html)

This is a good time to review Registry scams. Scammers call pretending to be from the local police. Scammers can spoof calls to make it look like it is from your local police. The scammers tell you things like you missed a court date, they don't have your DNA on file, or you need to pay for treatment. Scammers often claim there's a warrant for your arrest. Then scammers demand payment, generally a store gift card or prepaid debit card. They'll even demand you stay on the line while you go to the store to buy one, the demand you send them that info. They may even tell you to go to the police station AFTER you do this. In reality, your DNA will already be on file, if there's a warrant for your arrest the cops won't bother to call, and if you owe registry/treatment fees they'll tell you when you are at the registry office, not over the phone. Don't fall for these scams!

EXPANDING A BAD IDEA: REGISTRIES FOR EVERYONE!

In February 2025, the Department of Homeland Security announced they would be creating a registry of immigrants, demanding everyone who is in the U.S. "illegally" must register, give fingerprints and provide an address. It cited a section of the Immigration and Nationality Act — the complex immigration law — as justification for the registration process, which would apply to anyone 14 and older.

Criminal registries are nothing new. The oldest known criminal registries were formed nearly a century ago. In response to the rise of organized crime, Los Angeles District Attorney Buron Fitts proposed in 1931 a "convict registration" or "gangster law" requiring those certain offenses related to drugs or organized crime to register with the Sheriff if visiting for longer than five days. The ordinance passed in 1933 in both the city and County of Los Angeles. As fear of "sexual psychopaths" became a greater fear than gangsters, the focus shifted to sex offenses, including homosexual activity.

In 1940, the LA chapter of the PTA pushed for sex offenses (child molestation, consensual oral sex, and indecent exposure) to be added to the convict registry. By the time the ordinance was signed by the mayor, rape, loitering around children, and consensual anal sex were also included. However, the county did not adopt the measure until 1947, the same year the state of California adopted this registry idea statewide, establishing Penal Code 290. The new law was largely used as a tool to prosecute homosexual activity ("lewd vagrancy" was added to the list of registerable crimes in 1949); a total of 2225 people were registered for "sexual perversion" (homosexuality), 161 for rape, and 44 for "other sex crimes." Similar registries were adopted in Florida and Arizona in the 1950s, and Nevada, Ohio, and Alabama followed suit in the 1960s. While few states had a sex offense registry, the practice ultimately influenced the creation and passage of the first nationwide registry law, the Jacob Wetterling Act, in 1994.

While every state and US territory is required to maintain a sex offense registry, there are only a handful of states that maintain registries for other types of criminal convictions. Kansas, for example, created a habitual sex offense registry in 1993, then expanded it to include first-time offenses in 1994, and expanded it once again in 1997 to become the Kansas Offender Registration Act (KORA). KORA added violent offenses and non-sexual violent offenses against anyone under age 18 to the public registry. It now includes some drug offenses. The Kansas Supreme Court has upheld KORA (see *State v. Petersen-Beard*, 377 P.3d 1127 (Kan. 2016)).

As noted in *The Appeal* in 2018, At least five states (Montana, Oklahoma, Kansas, Illinois and Indiana) have violent offender registries. Some states have them for meth (Tennessee and Kansas), others for drunken driving (Ohio's has over 5,000 people on it). Florida has a "career offender" registry for people convicted of three violent crimes or who have been designated a "habitual violent felony offender" by a state court. Some jurisdictions require registration for narrower categories of offenses like violent crimes against children or animals.

While the idea of expansive registries had slowed in recent years, this tired concept is making a comeback using the same justifications. So far this year, Florida introduced SB 494 to create a statewide public registry for those convicted of abuse against animals (11 counties have local ordinances, according to one news report). West Virginia's HB 2366 and Tennessee's "Savannah's Law" (HB1200) will create a public registry of persons convicted of domestic violence if they pass. Of course, in the case of these domestic violence lists, it only takes having

someone decide to file a restraining order against you to have you placed on the list, making weaponization of the registry far too easy.

Of course, the same problems with sex offense registries apply to any registry. As reported by PS Mag in 2017, Amanda Agan, a Rutgers University professor who studies the economics of crime, noted, “These policies were well intentioned and they sounded like they might work. And on top of that they are relatively low cost... But now we have all of this evidence that they just don’t work, but the problem is it’s very difficult to start pulling back. There would be a public outcry.” J.J. Prescott, a University of Michigan law professor and a trained economist, says that unraveling registries present a difficult political problem because while the upsides are intuitive to voters, the drawbacks are far less straightforward. “The deterrence of prison is reduced by the use of public registries, because they have the effect of destroying the value of being out of prison by turning people into pariahs. Prison as a threat only works if you have something to lose.”

Public registries appeal only to vigilantes and those who wish to cause harm. We all know this. Making pariahs out of a growing number of people, however, fits in with the fascist rhetoric of the far-right extremism of the tRUMP administration.

On that note, the Sex Offense Litigation and Policy Resource Center (SOLPRC) at Mitchell Hamline School of Law (MN), which maintains a database on court rulings and research on sex offense topics, has published a noteworthy report in March 2025 entitled, “Ineffective, Costly, and Harmful: DEBUNKING THE SEX OFFENSE REGISTRY.” It is twelve pages in length, including references. This may be helpful in attacking other registries or if you just like reading research papers. (12 pages long)

You can access this report through the following link: <https://mitchellhamline.edu/sex-offense-litigation-policy/wp-content/uploads/sites/61/2025/03/SORN-Policy-Brief.pdf>

EXECUTIVE SUMMARY: The modern sex offense registry was borne out of the belief that a public registry listing people who had been convicted of a sex offense would make communities safer. That premise was wrong. We now have thirty years of data concluding that public registries do not work as intended—in fact, there is evidence that public registries actually increase registrant recidivism. Furthermore, there is no definitive evidence that these laws deter non-registrants from sexually offending. At the same time, sex offense registration and notification (SORN) laws contribute to the stigmatization of registrants, which make securing employment and housing more challenging, and disrupt or preclude the maintenance of strong social ties. Registrants’ families also experience significant hardships. SORN laws should be abandoned, and resources should instead be invested in evidence-based interventions to address sexual violence that are currently starved for resources.

AIDE AT RUSHVILLE (IL) CIVIL COMMITMENT CENTER BUSTED FOR CP

While I usually don’t take pleasure in seeing folks arrested, I feel different when it is a cop, politician, or any gov’t worker involved in targeting Persons Forced to Register or who would be if released. An aide at a state facility for those being treated after serving time for sexual offenses has been arrested on charges of possessing and disseminating CP. B.R. was being held in the Schuyler County Jail after his arrest Thursday on two counts of dissemination of CP and 10 counts of possession of CP. Each conviction on a possession charge can bring up to seven years in prison. The dissemination charges are both Class X felonies, the most serious classification of crime in Illinois except for first-degree murder. Conviction on dissemination of CP can result in 30 years in prison on each count. B.R. is a security and therapy aide at the Dept. of Human Services’ Rushville Treatment and Detention Facility. The facility houses more than 500 persons who have served prison sentences for s*x offenses but remain in state custody because they are considered a “danger to society.” Investigators reported finding CP during a search of B.R.’s residence.

(Source: David C.L. Bauer. “Aide at Rushville sex offender treatment facility arrested on child pornography charges.” Journal Courier. 21 March 2025. <https://www.myjournalcourier.com/news/article/rushville-aide-child-pornography-arrest-20234938.php>)

CONTENTIOUS WISCONSIN SUPREME COURT RACE SHOWS BOTH DEMOCRATIC AND REPUBLICAN CANDIDATES EXPLOITING PREDATOR PANIC IN ATTACK ADS

The Wisconsin State Supreme Court race garnered a lot of contention as a litmus test for the tRump administration and his belief the election was a “mandate” for his chaotic policies. Winning the race would allow the Democratic party to maintain a 4-3 advantage and prevent Republicans from gerrymandering a critical swing state. Most notably, over \$100 million was spent on this race. Elon Mush alone pumped nearly \$30 million into the race, including giving two \$1 million checks to what was later discovered were two pre-determined “winners” who were leaders of Republican PACS in the state. But something else was noticed and mocked on Comedy Central’s “The Daily Show.”

In The Daily Show segment that aired on 3/28/2025, host Ronnie Chieng introduced a video montage of clips from the TV ads running in Wisconsin. Campaigns for both the Democratic candidate Susan Crawford and Republican candidate Brad Schimel ran ads that accused their opponent of being soft on sex crimes. Republicans ads included claims the “criminal are praying Susan Crawford gets elected” and your new neighbor will be “a p*dophile, thanks to Judge Susan Crawford's sweetheart sentence.” Democratic ads included claims like, “How corrupt is Brad Schimel? Schimel gave a plea deal to a man caught with child porn” and “Brad Schimel let a sex predator loose on our kids.”

Ronnie Chieng responded with, “Wow. Why is SVU wasting its time in New York? I mean, you got at least 20 seasons down there in Wisconsin. I mean, if you got this many p*dophiles in Wisconsin, maybe the problem is Wisconsin. Because for me, watching this on the outside, I'm like, should the rest of us put a wall up around Wisconsin to keep all the p*dophiles in there? I mean, I know it will trap the kids in there too. But the kids are probably also p*dophiles, so it should be fine. I mean, there are so many p*dophiles that if you want to win, you should probably be making pro-pedophile ads. Because it seems like it's a big constituency over there. Like, why don't you do some outreach?”

Weaponizing Predator Panic is nothing new, even in political ads. I have stories going as far back as 2008, and both Democratic and Republican candidates have exploited it. This state Supreme Court race was highly contentious, and so the need to weaponize Predator Panic was higher than before.

Just two years prior was another highly contentious Wisconsin Supreme Court race, and Predator Panic was also exploited using a series of political attack ads. Bruce Murphy, who writes a segment in the online magazine “Urban Milwaukee” called “Murphy’s Law”, noted that, “The Supreme Court isn’t a trial court that decides the sentences for child predators or any criminals. Nor is it likely to review sentences by lower courts for sexual offenders. ‘The Wisconsin Supreme Court rarely reviews sentences. Such cases also always end with a court of appeals decision,’ notes Madison attorney Lester Pines, who has handled more than 15 cases before the high court going back to the 1980s...”

Murphy’s assertion may be true in that regard; however, Wisconsin is a battleground state for one major issue of interest to anti-registry activists. For years, legal challenges on the state’s controversial lifetime electronic monitoring program (or GPS) has worked their way through the courts., Brad Schimel, the same one who failed in the 2025 state Supreme Court election, was formerly Wisconsin’s Attorney General. During his tenure as the state’s AG, Schimel had broadened the class of those subjected to lifetime GPS monitoring to include not just “recidivists” (those with 2 separate convictions), but to include those convicted of more than one count even on the same offense, thus subjecting more Registrants to lifetime GPS. The Wisconsin Supreme Court previously ruled that lifetime electronic monitoring as a sanction against sex offenses is not punitive. (See *State of Wisconsin v Muldrow*, 2018 WI 52)

However, in *State v. Corey T. Rector*, 2023 WI 41, the Wisconsin Supreme Court ruled that (4-3) that Rector was not required to register for life from multiple convictions stemming from a singular case. While this case did not involve someone on lifetime GPS, GPS had been issued to those with multiple convictions for the same offense. The Capital Times of Madison WI (a.k.a., “Cap Times”) reported on 8/8/23 that the Wisconsin Department of Corrections (WIDOC) began removing GPS from Registered Persons convicted of multiple charges for the same offense; they had reported 625 Registered Persons not under WIDOC supervision was on GPS but were unsure how many of them the new policy would impact. In response to *Rector*, the Wisconsin legislature passed SB874 (2023

WI Act 254) in April 2024, reinstating lifetime GPS for multiple counts stemming from same offense. The WI Supreme Court will likely hear a new case in the future, but having a “liberal majority” at least gives us a greater than zero chance of overturning lifetime GPS.

2024 ADDICTIVE BEHAVIOR SURVEY

By: Registered Citizen Advocacy Partnership (RECAP)

(LOTL Note: I occasionally prisoner submissions when I have space permitting. Surveys have value as a way of ascertaining the needs of Registered Persons, including when it comes to treatment issues. When one of us is released & is arrested for a new offense, it can hurt ALL of us.)

Premise for survey: Through personal observation, it appeared that a good number of convicted Persons Forced to Register (PFR) were dealing with an active addiction or work in some phase of recovery. We decided to conduct a year-long survey to better ascertain the percentage of persons convicted of an offense of a sexual nature who also battle some form of addictive behavior. The survey was not intended to suggest a causal link between addiction and offending. Ours is an informal survey and should be viewed as anecdotal at best. Rigorous scientific study would be required to establish such a link. Our survey merely hints at a pattern of behavior.

Survey sample: While we intend to greatly expand the survey sample for future surveys, this inaugural survey was limited in scope to individuals convicted of a criminal sexual offense and who are incarcerated within the Federal Bureau of Prisons during the survey period. Of the adults in custody invited to participate in the 2024 Addictive Behavior Survey, approximately 50% responded during the survey window and officially tabulated. This further reduce the available sample size and undoubtedly factored into the overall results.

Survey query: the 2024 Addictive Behavior Survey asked the participants one simple question: “Prior to incarceration, did you battle with addictive behavior?” Participants were provided the opportunity to select one or more of the following addictive behaviors:

- 1) No addictive behavior;
- 2) Alcohol;
- 3) Drugs;
- 4) Pornography;
- 5) Other Addictive Behavior.

The survey itself was both voluntary and anonymous with no personal identifying information being collected. It should be noted that the survey total percentage value is greater than 100% due to the large portion of participants exhibiting multiple addictive behaviors. Of those exhibiting multiple addictive behaviors, 33.33% were drugs and pornography; 26.66% were alcohol and pornography; 13.33% were alcohol and drugs; and 22.66% were alcohol, drugs, and pornography (margin of error was +/- .02%)

Overall, the survey found the following rates of addictive behavior among survey participants convicted of an offense of a sexual nature:

- 1) No Addictive Behavior – 8.33%
- 2) Alcohol Addiction – 25.53%
- 3) Drug Addiction – 25.53%
- 4) Pornography Addiction – 61.7%
- 5) Other Addictive Behaviors – 8.51%
- 6) Multiple Addictive Behaviors – 31.25%

The leading behavior by a wide margin was addiction to pornographic material. Overall, 91.97% of participants battled with addictive behavior.

I hope this information proves useful. Feel free to republish it, question it, or trash it. I’m hoping the next survey be supported by a larger and more diverse survey sample. The plan is beginning in 2026; it will include state and federal as well as incarcerated and “free world” participants. (As “free” as a PFR can be, that is.)

BLUEPRINT FOR LEVEL 2 REMOVAL FROM REGISTRY

By: Jeremy, a man recently removed from the SOR

(Note: This is one person's journey off the registry. Some of this advice might be helpful for some readers, but some states do not provide similar relief from the registry. However, the fact that some folks DO gain relief from the SOR should be encouraging for many of you who will be forced to register upon release. Also, cryptocurrency is mentioned in this article; DO NOT bother asking me questions about it; I am not versed in it. It is posted here to offer some encouragement for those hoping to eventually find a path off the registry.)

I've spent 15 years of my life fighting the good fight to get this Scarlet Letter off my back for entrapment thought crimes without pictures or even a victim. I was labeled, ridiculed, imprisoned, and beaten but I never gave up. In spite of all their efforts, I jumped through every hoop and carved my own path to freedom. The hardest part lies ahead, reuniting with my children that don't know me and was most likely lied to about who I am but I digress.

I wanted to see my sentence and registration requirements through to termination and give back to those who may need this information. It's a great option that I can personally say worked for me because it's the right thing to do and because I know how it feels. This following is a step by step guide getting off probation/parole and the registry if you are less than a level 3. (It may work for 3 but I was a 2)

1. Find a place to live within parameters with a solid friend or family member. This person needs to be available at "home" to say you live there even if you are never there. We'll come to that later.

2. Find the American Job Center near you or something like it. Go in and speak with someone about getting a Class A Commercial Driver's License. They will sign you up for an assessment test then enroll you in a class. It is 4 weeks for day and 8 weeks for night. There is no cost. It is a grant from the government so you don't have to sign a contract with a company if you decide a better job presents itself.

3. Become a professional truck driver. There are several truck driving companies that will hire you believe it or not. I've been here at U.S. Xpress for almost 3 years, however Western Express, Xpress Cargo, Sweet Express and Foodliner (wouldn't recommend Foodliner due to weather) will hire you. Probably Swift and Knight as well.

As a truck driver, it shows the probation, parole officer you're taking responsibility by maintaining a job that requires random drug tests, gives a solid alibi for location with inward facing cameras, signed bills with your name on them, and an employer who will testify to your whereabouts through people and evidence. They will no longer drug test you. You will be hard to get in touch with. If they want to see you they'll have to make an appointment with you so you can be home maybe in two weeks. They will get tired of this and say you're the best probationer/parolee and move you to unsupervised.

It's also important to note that you can live in your truck basically but you still need a person at a physical address where you collect mail saying you live there. Mine was my father. This keeps your bills to a minimal. Just your phone bill. You can stack up thousands of dollars on the road for an attorney and investment projects. I bought crypto so I can retire sooner. Only iso20022 tokens (a type of digital currency) from Coinbase and uphold and storing on a cold storage wallet. I used the D'cent wallet but again, I digress.

4. Upgrade your license with endorsements. Particularly the TWIC and Hazmat endorsements. Although they require a background check from TSA and Dept. of Homeland Security, they are surprisingly easy to obtain even for a felon on the registry. The requirements are that it goes from the time of your conviction rather than the end of your sentence on many crimes and the list is small. This is ammo for the courtroom in your favor.

5. Seek a re-evaluation to lower your level to a 1. Skip if you're a 1. This cost me \$1200 but prices may vary depending on the state approved psychologist. They will ask you to write a sexual history which is described by you. They take your word for it that it is true and correct.

6. Have a reason to come off registry. While building your experience and seeing more of the country than most people see in their life, you become eligible for better jobs that won't hire you because you're on the registry. This is

a legitimate reason to be released from registry requirements. Also you need to retire sooner so you need better jobs that way you can take care of your elderly parents.

7. Obtain an attorney. At this point you can afford a retainer if and save a few thousand dollars to go to court. You've already done all the legwork. At a level one or with a psychologist suggesting you be a level one and with the TWIC and Hazmat endorsement that has shown stability over the last few years in your career. The judge will terminate your probation/parole and registration requirements. You'll take the order to the police department where you register to be removed from the county registry that day and they will forward the order to the state which will remove you in the following few weeks.

I did this. Please forward this to anyone serious about coming off the registry. This was the least I could do for those of us who've been railroaded by an ungodly system. May you attain all the worthiness and successful attainment of all of the greatest blessings that a person can have. If this helps you or someone you know, I'll never know but it's been an honor and a pleasure serving you this day.

TEXAS: VIGILANTE THUG GETS 20 YEARS FOR ATTEMPTED MURDER

Charles Austin Broyles was convicted of aggravated assault with a deadly weapon for shooting Randell C. in the face on 12/3/2023 & sentenced to 20 years in a Texas state prison. Randall told jurors that on the night of Dec. 3, 2023, he was in the living room around 10 p.m. when someone started knocking on the door of his home in Stephenville TX. "I asked who it was and there was no answer," he said. "I was hesitant to answer the door and I looked out the window," but saw no one. He said the knocking continued and he went to the kitchen to get a "steak knife." He told jurors that he carried the knife in his right hand as he made his way to the front door. "As it was opening, I was jolted forward to the porch and that's when they stepped out and shoved a phone in my face," he said. The phone had a picture of him from the registry. He said he heard the assailant say, "Is this you?" "I nodded and that's when there was a loud ringing in my ears and I fell back into the house," Cowan said. "I noticed there was blood everywhere. I could hear my mother screaming as I was trying to figure out where all the blood was coming from." He said he could hear his mother talking to someone, then heard sirens in the distance. "She was screaming that the paramedics were coming to help me," he said. Randall said he had never met Broyles and has no connection to him; he spent 37 days in the hospital and underwent five surgeries; he continues to experience numbness, dizziness and trouble eating. Broyles planned on attacking two others but they weren't home.

This is a good time to remind you to use caution when answering your door. Get a doorbell camera, and have a heavy door installed if you can. Never open the door for strange people, even if they claim to be law enforcement.

ADDITIONAL ANNOUNCEMENTS

OnceFallen.com has initiated a project to help document or assist in finding information on municipal and county ordinances in select states. This is a work in progress, but so far, surveys of municipal ordinances in Florida and Nebraska have been completed, and spreadsheets for both states have been posted to the website. We are currently working on Wisconsin and Texas. There are also links to info on Colorado and Minnesota. To access this new resource, visit the link below:

<https://oncefallen.com/local-level-ordinances/>

For those who are forced to live in arguably the worst state in the US, Flori-DUH, there is a full report that is over 50 pages long, but prisoners may do better by printing the shorter version that only list the cities and counties with their own residency restrictions, reducing it to 18 pages. It is important to remember that Florida already has a statewide residency restriction law of 1000 feet plus a 300 foot proximity or anti-loitering restriction in place, so these are ordinances that add additional distances or restrictions not already added covered by state law. The short version is here:

<https://oncefallen.com/wp-content/uploads/2025/06/FL-Local-RP-Ords-Short-Version-Apr2025.pdf>