LOTL QUARTERLY 2026B (Apr.-Jun. 2026)

"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. Current & previous issues of LOTL & the former ICoN newsletters can be accessed & printed out for free at https://oncefallen.com/icon/

LEGAL NEWS

(Note: Many legal summaries are derived from summaries from other resources, Sex Offense Litigation and Policy Resource Center at Mitchell Hamline School of Law (SOLPRC) or Florida Action Committee (FAC). Source of analysis is mentioned at the end of each entry, if applicable.)

State v. Rauch Sharak (2026 WI 4): The WI Supreme Court unanimously ruled that warrantless searches of digital files identified as containing potential CP are constitutional when the evidence originates from a private platform's voluntary scan. Google's automatic scanning of users' Google Photos for such material did not make the company a government actor, even though the flagged content ultimately led to law enforcement involvement. The court emphasized that Google was not required by law to conduct these scans, and its actions were performed independently as part of its content-moderation and user-safety policies. Rauch Sharak argued that Google's scanning constituted a search by the government in violation of the Fourth Amendment, but the court rejected this claim, concluding that Google acted on its own behalf and not as an arm of the state. The decision affirms that evidence derived from a private entity's independent scanning and reporting of illegal content can be viewed by law enforcement without a warrant under the "private search doctrine." – (FAC)

State of NJ v. Millner/Gregg, A-0436-24/A-2145-24 (App. Ct. NJ, 2/23/2026): Note: These two cases were consolidated under the same ruling. Authorities must weigh whether an RP convicted in other states committed a crime similar to a Megan's Law offense before forcing them to register under the law in New Jersey. State law requires individuals convicted of sex offenses in another state to register under Megan's Law if they relocate to New Jersey, but the law contains a due process requirement that mandates authorities determine whether the law the person was convicted under is similar to a Megan's Law offense. That determination can be challenged in court once it is made but before charges are filed, the court said. The two men subject to the appeal were not provided that opportunity, the court found. – (NJ Monitor)

Michael Crist v. State of Florida: In 2019, during a sexual predator registration check, an officer saw Crist appearing to pick at his driver's license, and later discovered a sticker (a smiley face emoji) covering the "SEXUAL PREDATOR" language. Crist was charged with violating the statute requiring the designation and with evidence tampering. Crist argued that the "SEXUAL PREDATOR" designation forced him to convey a message he did not choose to express (compelled speech). He pointed to recent decisions from other courts (in Louisiana and an Alabama federal court) that held similar compelled labeling on IDs was unconstitutional. The trial court rejected Crist's challenge, holding that he failed to show the marked-license requirement was unconstitutional and that the designation served a compelling public safety purpose. Crist appealed. A three-judge panel of the 5th DCA initially reversed, agreeing with Crist's constitutional argument. But on state's appeal to the full 5th DCA panel, the Court reheard the case en banc and ultimately affirmed the conviction, holding that the requirement was constitutional — reasoning that the designation on a government-issued license amounted to state speech and did not violate Crist's rights. Crist appealed to the FL Supreme Court, but they just refused to take the case, so 5th appeals court ruling stands. – (FAC)

NY: The city of Syracuse has agreed to pay a man $130,000 to settle a lawsuit that alleged he was wrongfully arrested in New York City and brought back to Syracuse. Police were looking for a man named Kenneck Houck to arrest him on Failure To Register (FTR) charges. Instead, they arrested a Registrant from NYC named Kenneth Hicks. Hick was detained & transported to Syracuse before being released. He said in the lawsuit he had never been to Syracuse or to Onondaga County, and "had no family, no money, and no way to get back home to Harlem." The charges were dropped on April 7, 2022, after Hicks' attorney contacted the assistant district attorney

handling the case and she agreed the officers had arrested the wrong person, according to the lawsuit. Houck had also died two years before Hicks was arrested. – (syracuse.com)

State v. Davidson, No. COA25-478, 2026 WL 451717 (N.C. Ct. App. 2026): Davidson was convicted of "willfully" failing to update his registration information, a class F felony. In proceedings below, the trial court (1) failed to instruct the jury that failure to register (FTR) is a specific-intent offense under state law and (2) instructed the jury that any voluntary intoxication was therefore irrelevant. The court of appeals held that the trial court erred in failing to instruct that FTR is a specific-intent offense and, therefore, that voluntary intoxication was legally irrelevant. However, the latter error was not prejudicial because trial counsel declined to raise intoxication as a defense and the state offered sufficient evidence to show that the period of failure was over three months, undercutting the plausibility of intoxication (which requires being "utterly incapable" of forming specific intent). – (SOLPRC)

State v. Earhart, 34 Neb. App. 69 (Neb. Ct. App. 2026): Court rejected ex post facto challenge, arising out of trial court's dismissal of FTR charge, concluding that the state's retroactive increase in registration from 10 to 25 years was not punitive in intent or effect, relying upon Kennedy v. Mendoza- Martinez. – (SOLPRC)

Pierce, 497 Mass. 140, 273 N.E.3d 1184 (Mass. 2026): Pierce was involuntarily committed as a "sexually dangerous person" (SDP) and petitioned for a writ of habeas corpus. The court recognized that Pierce's commitment was unlawful because neither "qualified examiner" opined that he was an SDP, which is required by statute for SDP commitment. However, because of the extraordinary nature of habeas as a remedy, its limited application, and the availability to seek relief from judgment as a remedy, habeas relief was not available to Pierce. Case therefore remanded to the lower court with instructions to treat the habeas petition as a motion for relief from the commitment order. – (SOLPRC)

In re Commitment of Hamm, No. 03-25-00266-CV, 2026 WL 319781 (Tex. App. 2026): Hamm was involuntarily commitment as a "sexually violent predator" (SVP) following a jury trial. Hamm contended that 1) the trial court abused its discretion when it denied her motion to exclude the state's experts' opinions as unreliable because of the paucity of research validating the risk factors for women convicted of sex offenses, and thus there was insufficient empirical evidence for the experts' opinions about her recidivism risk, and 2) there was insufficient evidence to support the jury's determination. According to the court, evidence in SVP commitment proceedings concerns the application of a "soft" science, which is "held to a less rigorous standard than hard science expert testimony." The court found the expert testimony reliable under the "soft sciences" standard for reliability, and affirmed the judgment and order of commitment. – (SOLPRC)

US v. Buddi, No. 24-5953 (6th Cir. 2026): In 2017, Buddi was convicted under Florida state law of lewd and lascivious battery and transmission of harmful materials to a minor. In December 2023, she relocated from Florida to Bulls Gap, TM, and, as she stipulated, "knowingly failed to register in Tennessee and knowingly failed to properly notify Florida of her move to Tennessee in accordance with SORNA." Buddi pleaded guilty to FTR in violation of 18 USC §2250(a). The PSR classified Buddi as a Tier II based on her FL conviction calculated her base offense level as 14; this led to a Guidelines range of 21–27 mos. of imprisonment. The PSR also calculated the Guidelines range for Buddi's supervised release term as a flat 5 years. Buddi filed an objection to the SORNA classification, contending in relevant part that Florida's lewd and lascivious battery does not have a comparable mens rea requirement to 18 USC §2422(b), meaning that she should be treated as a Tier I with a resulting base offense level of 12. In a Memorandum Opinion and Order issued on the day of Buddi's sentencing hearing, the district court overruled her objection. The district court ultimately sentenced Buddi to 24 months of imprisonment, followed by twenty years of supervised release. The 6th Circuit agreed with Buddi's argument, overturned the lower court's ruling.

Additional notes on the *US v. Buddi* ruling, What is interesting about this particular ruling, as pointed out at FAC, is that the Court ruled that "§2422(b) requires knowledge of a victim's minor status and, as a result, that Florida lewd and lascivious battery is not a comparable offense to § 2422(b) under the categorical approach." As noted by FAC: "That conclusion becomes even more compelling when you look at what actually makes the conduct criminal. In

most cases, persuading an adult to engage in sexual activity is not illegal. What transforms otherwise lawful behavior into a serious federal offense is the age of the other person. As the court put it, that fact (the victim's minor status) is the "crucial element" separating innocent conduct from criminal conduct. And when a single fact carries that much weight, courts are generally reluctant to impose criminal liability without requiring proof that the defendant knew it. The court also addressed a seemingly similar federal statute, one that criminalizes transporting minors for sexual activity. Under that law, courts have consistently held that the defendant does not need to know the victim is underage. But the court here drew an important distinction: in the transportation statute, sex trafficking is already illegal, and age simply increases the penalty. In the enticement statute, by contrast, age is what makes the conduct illegal in the first place. That difference, the court said, matters and it justifies requiring knowledge of age in one context but not the other."

Rico v. US, No. 24–1056 (S. Ct. March 25, 2026): Not an "SO" case but some of you may find it interesting. SCOTUS ruled 8-1 (Alito the sole dissenter) that, "The Sentencing Reform Act of 1984 does not authorize a rule automatically extending a defendant's term of supervised release when the defendant fails to report to a probation officer."

Doe v. Glass, Case 1:18-cv-24145-KMW (SD FL 2026): The US District Court of Florida, Southern District, dismissed an legal challenge in which the state requires people convicted of sex offenses before the registry took effect. (This is, essentially, an "ex post facto" challenge.) Plaintiffs, whose offenses were committed before the statute's original version of SORNA was enacted in 1997, are all registered pursuant to Florida's 2018 SO Registration Act (hereinafter "FSORNA 2018"), §943.0435 (2018). This case had previously been sent back to this court by the 11th Circuit, but once again this US District Court dismissed the case in favor of the state.

State of Oregon v. De Witt Simons, No. 15 (OR 2026): The Oregon Supreme Court reversed the conviction of a man convicted of encouraging child sex abuse, ruling that local authorities subjected him to a warrantless search when monitoring his use of a restaurant's free wireless internet network. Simons had used a wireless network from an A&W restaurant to access the Internet to access illicit photos, which led to his arrest. The Oregon Court of Appeals had upheld the conviction, concluding there is a lowered expectation of privacy when using a public Wi-Fi and therefore the investigation into Simons's internet activities did not constitute a "search." The Oregon Supreme Court disagreed, concluding that Art. 1, Sec. 9 of the Oregon Constitution, which covers a person's privacy rights when accessing the Internet, applies even when a person is using a non-secure public Wi-Fi. (The Court concluded that this applies even if you agree to the terms of service of a business/public Wi-Wi, which generally requires you to agree that you have a lowered degree of privacy when using the eir Wi-Fi.). The investigation therefore constituted a search, and thus required a warrant to conduct a search. Since no warrant was ever issued, the arrest was not a proper arrest and the case was remanded back to the circuit court for further proceedings.

Commonwealth v. Arnett, No. 19 MAP 2023, 2026 WL 859860 (Penn. 2026): Court holds that a petition for relief under state Post Conviction Relief Act is not the proper mechanism to challenge the constitutionality of the state SORN law because the PCRA only permits challenges to a "conviction or sentence," and SORN is not criminal in nature. – (SOLPRC)

State v. Smathers, No. COA25-357, 2026 WL 764087 (N.C. Ct. App. 2026): Smathers was convicted of failing to report an online identifier and challenged the requirement as facially unconstitutional. As a threshold matter, the court held that the requirement implicated the First Amendment right of free speech, and that intermediate scrutiny applied because the requirement was content-neutral. Applying the framework, the court held that the reporting requirement furthered an important governmental interest (safeguarding safety of children), and that the requirement was narrowly tailored (only allowing public disclosure of the information upon specific request regarding the individual or the sheriff deems disclosure necessary for public safety). Challenge denied. – (SOLPRC)

Kallal v. Godinez, No. 14-CV-844-SMY, 2026 WL 872486 (S.D. Ill. 2026): The court held that the Fourteenth Amendment due process rights of two civilly committed plaintiffs have been violated because inadequate treatment and inadequate risk assessments have resulted in plaintiffs being detained indefinitely with no real hope of being released. The court entered a permanent injunction requiring that plaintiffs receive a minimum of five

hours of group therapy per week and that recovery/release evaluations must analyze plaintiffs' current and future risk based on treatment effects rather than solely historical information. – (SOLPRC)

S.G. v. New Jersey Dep't of Corr., No. A-2123-23, 2026 WL 598964 (N.J. Super. Ct. App. Div. 2026): Plaintiff is a transgender woman who is civilly committed at the Special Treatment Unit (STU). She filed suit challenging the denial of her request to be transferred from the STU to a women's-only correctional facility on the grounds that the denial violated the state anti-discrimination statute and the Equal Protection Clause. The court affirmed the NJ DOC's decision to deny her transfer request. The court reasoned that the decision was not arbitrary, capricious, or unreasonable because the DOC is required to house people who have been civilly committed separately from people serving criminal sentences and the STU is designated as the sole treatment facility for people who have been civilly committed. – (SOLPRC)

Doe v. US Deptartment of Justice, EDCV 22-0855 JGB (SPx) (USDC Cen. CA, 4/9/2026): A federal judge issued a permanent injunction blocking the DOJ from prosecuting California residents under a federal registration law without first confirming with the state that those individuals are required to register in the first place. The Pacific Legal Foundation represents a group of plaintiffs who are caught in a bind created by conflicting federal and state law. Each had been convicted of a sex offense, served their punishment, been rehabilitated and earned removal from California's registry through expungement or formal court petition. But in 2021, the DOJ adopted a rule under the federal Sex Offender Registration and Notification Act (SORNA) that required PLF's clients to re-register with the state— even though California, having recognized their rehabilitation, prohibits the state from accepting registration from those who merited removal from its registry. Nonetheless, because of SORNA's requirements, PLF's clients faced the threat of federal felony charges and up to ten years in prison. Although they can't register with the state, the federal government claimed authority to prosecute them anyway. In his ruling, U.S. District Judge Jesus G. Bernal found that arrangement unconstitutional because the law required the plaintiffs to raise an affirmative defense — essentially proving their own innocence — to avoid prosecution for something they had no ability to do. The government was treating "not being registered" as proof that a SORNA crime had occurred, without ever establishing that the plaintiffs had actually failed to act. In the court's analysis, that improperly shifted the burden of proof on a core element of the offense. "The government cannot punish someone for failing to do something the law itself makes impossible," said Allison Daniel, PLF attorney. "Our clients did everything the law asked of them — they served their time, rebuilt their lives, and earned relief from California's courts. The federal government's ability to criminalize them anyway was a due process violation. This ruling makes clear that constitutional protections don't have exceptions." – (Pacific Legal Foundation)

Beagle v. People (2026 CO 24): The SO Supreme Court rejected an 8th Amendment cruel and unusual punishment challenge to the state's "sexually violent predator" (SVP) designation of registrants who are assessed at the highest risk on the state's risk assessment tool. Individuals who receive the SVP designation must register for life and are subjected to community notification procedures that can include town hall-style meetings. Concluding that the law is non-punitive in legislative intent, the Court reasoned that the Supreme Court's recent decision in *Ellingburg v. US*, 146 S. Ct. 564 (2026), which held that the federal restitution law was punitive in intent for ex post facto purposes, did not support petitioner's challenge. Thereafter, the court reasoned the SVP designation was not punitive in effect based on the Mendoza-Martinez factors. – (SOLPRC)

NARSOL v. Ronald Creighton Davis et al., No. 25CV035559-910 (Wake Co. Superior Court, NC 5/18/2026): A man who spent months posting false allegations about the National Association for Rational Sexual Offense Laws (NARSOL) on Facebook, including a fabricated claim that the organization is linked to groups advocating child sexual abuse, was ordered to pay NARSOL $18,458.56 in damages. Ronald Creighton Davis, of Pierce Co., GA, never answered the lawsuit. He didn't file paperwork and didn't appear in court; he did not contest anything, so NARSOL won by default judgment. Davis participated in multiple campaigns aimed at preventing NARSOL from holding its annual conference. The first succeeded. In June 2025, a Hilton property in Grand Rapids canceled NARSOL's conference contract after a pressure campaign that included online threats, doxxing of NARSOL leadership, in-person hotel pamphleting, and calls to Hilton's corporate offices. Davis bragged in his posts that he helped make that happen. He also tried the same tactics when the NARSOL Conference was moved to Atlanta.

LEGISLATION PASSED SO FAR IN 2026

Most state legislatures conduct their sessions in January and many are concluded before the summer. As of 6/17/2026, only CA, DE, MA, MI, NC, NJ, OH, and PA are still in regular session; AK, GA, SC, and VA are in "special session" but rarely do SO bills pass during these special sessions as they involve issues like budgets or redistricting.

- Alabama (AL)
  - Act 2026-55 (HB41): Certain sex offenses (rape, sodomy, & sexual torture) are now "capital" (death penalty) offenses if the victim is age 12 or under.
  - Act 2026-544 (SB199), creating §15-20A-19.01 & §15-20A-20.01: Effective 10/1/2026, parolees convicted of offenses against a minor (age<19), can be restricted from renting a Post Office Box or possess electronic media that can access the Internet (incl. computer, tablet, gaming system, phone, excl. Those used solely for employment) & be forced to take treatment which can include polygraphs; RP on paper must pay for poly exams unless declared indigent (min. two per year)
- FloriDUH (FL): Chapter No. 2026-17 added "public swimming pools" to list of both residency and presence restrictions; increased presence restrictions to 500 ft., and allows warrantless arrests for violations of presence restrictions
- Idaho (ID): Session Law Ch. 204/ HB 683 (2026), effective 7/1/2026: Changes the definition of "residence". "Residence" was changed from "offender's present place of abode" to "location where an offender habitually lives." "Habitually lives" means any place where a person lives, sleeps, or visits with any regularity, including where a homeless person is stationed during the day or sleeps at night, and any place where a person visits for longer than five (5) hours per visit more than five (5) times within a thirty (30) day period. "Homeless" means having no fixed residence. Residency Restrictions shall apply when the person resides at a residential or long-term care facility. Only the county sheriff, not local police chief, can decide if RP can stay at an emergency shelter or recovery facility within a residency restriction zone.
- Iowa (IA): SF 2379 (2026)) has lowered registration requirements from five business days to three business days
- Indiana (IN): Public Law 111 (2026) added the following:
  - Employment Restrictions: As of 7/1/2026: at a facility or event that provides entertainment or programming primarily directed toward those age<18 (IC §35-31.5-2-300(8))
  - Presence Restrictions: Certain RPs cannot enter " a facility/ location holding an event that provides entertainment or programming primarily directed toward a child age <18"
- Louisiana (LA): Under HB784/Act 838 (2026), RPs not otherwise prohibited from using any social networking website are required to add info on the social media profile that identifies you as an RP, including conviction info, physical address and description, and place of conviction, and you must register any static IP addresses; this bill also requires a "quick response" or "QR Code" on the back of a State ID/DL to "assist law enforcement on identifying" you as an RP. (On a somewhat related note, Act 151 (2026) made "unlawful exposure by an inmate" a registerable offense.
- Missouri (MO): Passed SB 982 (2026), which states that those staying part-time for work/school must register for the duration they are in the state for such purposes & be assigned a Tier level; it also clarifies that those with extra-jurisdictional convictions can petition for removal from the registry if removed from the registry from their convicting jurisdiction or based on a law that has since been amended, repealed, or invalidated. This bill effectively reinstates a pathway for removal from the registry that had been previously invalidated by previous state Supreme Court rulings.
- Oklahoma (OK): Two major laws passed:
  - HB 3040 (2026): Adds the following places to the list of the 500 ft. anti-loitering restrictions, " any facility, business, or location that primarily caters to or provides services for minors including, but not limited to, skating rinks, youth recreation centers, public swimming pools, arcades, amusement parks, and water parks."
  - HB 4104 (2026): The following crimes were added as B5 Felonies & Registrable Offenses, and those forced to register due to conviction of these offenses can appeal to be removed from the registry after 5 years: (1) Second and subsequent offense of watching, gazing, or looking upon a person in a

clandestine manner for prurient interests; (2) Using photographic, electronic, or video equipment in clandestine manner for prurient interests; and (3) Second or subsequent offense of using photographic, electronic, or video equipment in clandestine manner to capture image of private area without consent.

- South Dakota (SD): HB 1076 & SB 107 (2026) altered the definition of "community safety zone"; RPs cannot reside/loiter within 500 ft. of a "community safety zone" (now defined in SDCL §22-24B-22 as a "domestic abuse shelter, licensed day care center, licensed group family day care home; public park, playground, or pool; registered family day care, school; or sexual assault shelter").
- Tennessee (TN): SB2030 requires RPs to notify the owner or operator of any campground on which the RPs intends to stay overnight of the RP's registry status prior to beginning the stay; creates the offense of knowingly staying overnight at a campground without providing the required notice, which is punished as a Class E felony.
- Utah (UT): The code for the state's registry has been recodified as Chapter 53, Chapter 29. The laws are largely the same except that in older editions of YLOTL, the laws are the same but the code numbers starting with §77-41 can largely be replaced as §53-29. There were still some new laws passed this year:
    - HB 370, effective 5/6/2026, changed or revised the following:
        - Redefines registering authority: Local police, or County Sheriff if not in incorporated area or if municipality lacks a registry office) See UC §53-29-308, Effective 5/6/2026 per HB370 (2026)
        - Transient/unhoused RPs: Effective 5/6/2026 per HB370 (2026), those who cannot provide a fixed address are placed on GPS monitoring at their expense; applies to those whose offenses were committed on/after 7/1/2026 (UC §53-29-304(4)(c) and §53-29-406)
        - UC §53-29-101(10): "Primary residence" means the residence where an offender regularly resides, even if the offender intends to move to another residence or return to another residence at a future date.
        - UC §53-29-101(15)(a):"Residence" means a structure, or a portion of a structure, that is designed and intended for occupancy as a dwelling by one or more individuals. (b) "Residence" does not include a temporary structure, a vehicle, or an area of unimproved real property.
    - Effective 5/6/2026 per HB123 (2026): for extra-jurisdictional offenses (i.e., convictions from a non-Utah court), "equivalent offense" was removed from the state statutes; now, registration is only if the RP is required to register in the jurisdiction of conviction, and for the same period of time as the convicting jurisdiction. So if the feds list you as a Tier 2, which requires 25 years' registration, you'd register for 25 years in Utah.
- Virginia (VA): Acts of Assembly Ch. 96 & 480 (2026) added 100 ft. restrictions around official parks, playgrounds, athletic fields/ facilities, or gymnasiums on grounds run by the Parks Authority & State parks for the purposes of communicating with children that are not you own, if convicted on/after 7/1/2026. VCA §18.2-370.2(D)
- Wisconsin (WI): Under 2025 WI Act 98, transient RPs must now wear GPS for the duration of their homelessness (See: WS §301.45 (4)(b); WS §301.48(2)(e))
- Wyoming (WY): Cannot hold public office (WS §9-1-104; Act #37 (2026)); cannot reside within 1000 of a child care facility (WS §7-19-302; Act #52 (2026))

On the federal level, bills have been INTRODUCED, but not yet passed, that would prohibit many registrants from receiving their hard-earned federal pensions (S. 4447) and Medicaid benefits (HR 7453) as well as protection in federal shelters (HR 7624).

NEW SCAM ALERTS: SCAMMERS TARGET EMPLOYERS OF RPs; MAIL FRAID

For years, we have warned that scammers love to pretend to be LEAs or agents of the court, scare you into thinking you owe additional fees or have an arrest warrant that can be solved by sending the caller a prepaid or actual credit/debit card number. These are obvious scams since your registry officer would inform you of any fees when you register, and cops/courts won't call you about unpaid fines or warrants. So some scammers have taken

to using the registry to target employers of Registered Persons (or anyone else that can be tied to you like loved ones, if they can make the connection between you and another person).

“Scammers pretending to be with Michigan State Police (MSP) are preying on people on the state's sex offender registry. According to MSP, the scammers are calling employers of people who are on the registry, which are listed on offenders' registry profiles. These scammers are trying to get personal information and payment for outstanding warrants and fees. The callers identify themselves as Trooper Callahan, and provide badge number 1062. However, this is not how police will contact people for payment or personal information. Employers who receive such calls should hang up.” (Source: “Scammers posing as Michigan State Police to contact employers of people on sex offender registry.” Fox 2 Detroit. 3/25/2026. https://www.fox2detroit.com/news/scammers-posing-michigan-state-police-contact-employers-people-sex-offender-registry) Florida Action Committee mentioned in a reposting of this report that this is already a common scam call in FloriDUH.

Dealing with potential fraudsters on the phone: It is best you keep the number for your registration office handy. When confronted with a suspicious call claiming to be law enforcement, hang up, wait a full minute (especially on a landline), call your registry office using the number you have, NOT the one provided over the phone, and talk to the registry office. It is suggested to wait a full minute to call back because some smarter criminals may use software that can keep a number on the line for a few seconds after it hangs up. After all, a call from someone claiming to be an LEA would alarm us and cause us to panic and immediately call back. Better safe than sorry.

Another scam is using an older technique to scam Registered Persons—mail fraud. Maine State police officials warned registrants in April 2026 that scammers sent letters to Registrants on supervision, claiming to be from the “Maine Probation Tonduary.” (There is no such word as “Tonduary”.) The letter claims there has been a data migration error in the Records Management System and the registrant needs to email personal identifying information (PII) to an email address listed on the letter. This is a variation of scams that target the public but look official, but the information on the letter is wrong. The scammers expect you to panic and call, email, or text a fraudulent number listed on the letter.

Actually, all scams can be dealt with this way: Whether you are contacted by mail, text, email, or phone, law enforcement won’t call you for unpaid fines or outstanding warrants. NEVER use the contact info on that notice. If you owe fees the PO or registry office will let you know when you check in, and if you have a warrant, they aren’t going to tell you until you check in. They aren’t going to accept gift cards, prepaid credit cards, or cryptocurrency to repay fines. If you are on paper, then you should have the number to your P.O. If you’re NOT on paper, then you should contact the registration office.

ALERT: NEVER OPEN UNKNOWN PACKAGES

On 4/6/2026, Florida Action Committee reported, “A commercial website (called “Send Mail From Hell”) is offering something deeply troubling. It provides a map interface tied to registrants in Florida and encourages users to target them. For a fee, they will send an anonymous “glitter bomb” to the recipient. This is a platform that is intended to facilitate harassment, intimidation, unwanted communication and potentially violence.”

For those asking, “What’s a glitter bomb”, a glitter bomb is advertised as a “prank” similar to the old snake in a can gag. You open up a package (usually a tube or can be a small box) and you are sprayed with glitter, dyes, and/or synthetic fart smell. There are already online companies that allow individuals to send anonymous glitter bomb packages to unsuspecting persons as a harmless gag, and glitter bombs have gained recent notoriety for being used to target “porch pirates (i.e., those who steal delivery packages from residential homes.) But unlike rival companies, Send Mail From Hell advertises it as a way to target Registered Persons; it offers a map of all Escambia Co., FL registrants with offenses against minors, and you can select a dot and order a glitter bomb to be sent to the registrant. Best case scenario is that the site itself is a scam and that the owner never delivers. Worst case scenario is that someone gets injured. Either way, this is still an example of weaponizing the registry. (Addendum: Florida Action Committee contacted the Florida Dept. of Law Enforcement; FDLE, which runs the registry, responded they

didn't know if they could do anything about it. But we pressured the man who created the site to remove the website.)

Is this legal? At the least, it should violate state registry laws, though I doubt that LEOs will spend time investigating it. In a Nov. 2025 report by KY3 (Springfield, MO), attorney Grant Rahmeyer, of Rah Law, warns that homeowners could face criminal charges and financial liability if someone gets hurt. "Setting up a booby trap is generally always considered illegal," Rahmeyer said. "It's a risky thing to do is what I would tell your viewers. Cause if you do. If you hurt them with a booby trap, you absolutely can get in trouble."..."Anybody, you know, the postal worker, the DoorDash guy, the Amazon guy, the Girl Scout selling cookies, kicks this box out of the way. And these people that are just invitees to your property, utility workers, you name them, they kick this box out of the way, and they get covered in whatever or get hurt," Rahmeyer said. The attorney warns homeowners could face serious criminal charges depending on the circumstances. "I think just trying to do this is so fraught with risk. Cause if that person gets hurt, you're going to get charged with potentially a serious crime, a misdemeanor, a felony. It just all depends on the circumstances." (Paul Adler. "Fact Finders: Pranking a porch pirate. Do homeowners face any risks?" KY3, 11/26/2025, https://www.ky3.com/2025/11/27/fact-finders-pranking-porch-pirate-do-homeowners-face-any-risks/)

The bottom line is that you should be wary of any packages that arrive at your residence that you did not personally order. If it looks suspicious, take it to the police. It is hard to determine where a package originates, especially when ordering from eBay or other companies that allow third-party selling to occur.

PERSON FORCED TO REGISTER RUNS FOR FRESCO, CA CITY COUNCIL: INSANITY ENSUES

In January 2026, 41-year-old Rene Campos (a Registered Person) applied to run for the Fresno City Council's District 7 seat. Campos had been convicted for a CP offense in 2018 and served 2 years on probation. Under current California and Fresno law, nothing bars sex offenders like him from running. District 3 Councilmember Miguel Arias even compared Campos to a high-profile sex trafficker sweeping the news. "I did hear some of the concerns of a potential future or former Epstein-type candidate coming to this dais," Arias told Your Central Valley in Fresno. "Any given Thursday, we have kids in this room. We have families."

Of course, the first question is whether Fresno can even do that? Fresno is a "Charter City," which means that, unlike "general law cities" that are restriction only to the general laws governing municipalities in the state, a Charter City has a lot of leeway in creatin and enforcing their own rules and regulations. As noted in a ummary by US Berkley, "Article XI, section 3(a) of the California Constitution authorizes the adoption of a city charter and provides such a charter has the force and effect of state law. Article XI, section 5(a), the 'home rule' provision, affirmatively grants to charter cities supremacy over "municipal affairs." However, the California Constitution does not define the term 'municipal affair.'... Whether a given activity is a municipal affair over which a city has sovereignty, or a statewide concern, over which the legislature has authority, is a legal determination for the courts to resolve. Thus, the determination of whether a given activity is a municipal affair or statewide concern is done on a case-by-case basis. The court's determination will depend on the particular facts and circumstances of each case. Keep in mind that the concept of 'municipal affairs' is a fluid one that changes over time as local issues become statewide concerns". – (Source: UC Berkley, "Foundational Aspects of Charter Cities." https://www.law.berkeley.edu/files/Albuquerque3_-_Foundational_Aspects_of_Charter_Cities.pdf). In short, This power is limited only by the charter itself and by statutes (state laws) on matters of statewide concern.

While a lawsuit would likely have to be filed to determine whether allowing certain people to run for public office is a municipal affair or a government interest, the California Supreme Court had made previous rulings that limited a community's ability to limit the lives of Registrants. In 2014, the Fourth Appellate District of the California Court of Appeal, in *People v. Nguyen*, 222 Cal. App. 4th 1168 (2014), held that a local ordinance making it a misdemeanor for registered persons to enter a park where children regularly gather without permission from law enforcement is preempted by state law. Specifically, the Court found that the legislature enacted a comprehensive statutory scheme that "Fully Occupies the Field". This means that even if the state did not specifically state that municipalities cannot state in their statutes that municipalities cannot pass their own ordinances regulating the

lives of Registered Persons, “The Legislature expressly declared its intent to establish a comprehensive and standardized system for regulating s*x o**enders when it passed the S*x O**ender Punishment, Control, and Containment Act of 2006... Considering the Legislature's declared intent coupled with the scope and nature of the restrictions the foregoing Penal Code sections imposed, we conclude the Legislature established a complete system for regulating a s*x o**ender's daily life and manifested a legislative intent to fully occupy the field to the exclusion of Section 4–14–803 and other local regulations. Considered as a whole, these statutes regulate much more than the geographic restrictions imposed on a sex offender. They regulate numerous aspects of a s*x offender's life so that both law enforcement and the public can monitor the s*x offender on a daily basis.”

Campos told FOX26 he deserves a second chance and has taken the necessary steps to reintegrate into society: “A constant battle of proving and proving and proving. How far does the person have to go before they have rehabilitated? When is it enough? How far does the person have to go? I stand in front of Fresno City Council and still they don't believe in the very laws they're pushing,” When asked about the proposed legislation to block his candidacy, Campos said: “My focus is District 7. However, this this reaches way further than Fresno, California, and so forth. The more people you put in a box, the easier it is to put the next person in a box.”

ABC 30 Action News then reported that “Fresno City Leaders are moving forward with plans for an ordinance that would bar a potential council candidate, who is a registered (person), from being able to enter various city facilities. That candidate is now pushing back. ‘The constitution does not grant government the authority to pre-select who is worthy of democracy. Voters decide, not councils, not rhetoric, not fear,’ says Rene Campos.” In response, Miguel Arias, Fresno City Councilman, threatened, “We're not going to allow our city to be represented by sex offenders. We have limits around state law that we can't control, but there is a lot of control that we do have locally... We have plenty of broad authority and ability to limit access.” Council Member Miguel Arias says the city intends to extend those restrictions with an ordinance that would bar any registered sex offender from city facilities like council chambers, community centers, police and fire stations.

On Mach 17, 2026, Your Valley News reported that “The City of Fresno is looking into banning (RPs) from attending city council meetings and installing facial recognition technology to enforce it.” David Synder, attorney & executive director at First Amendment Coalition, was quoted in the same article that, “If you start barring people who have one type of criminal conviction, why not any other type of criminal conviction? And that’s sort of one of the underlying purposes of the Brown Act is that the public is the public and the public gets to attend.” In addition to the First Amendment, “Congress shall make no law ... abridging the freedom of speech ... or the right of the people peaceably to assemble, and to petition the Government for a redress of grievances.” But California offers an additional protection called the Brown Act; the Ralph M. Brown Act is a California law that guarantees the public's right to attend and participate in meetings of local legislative bodies. Located at California Government Code 54950 et seq. Starting July 1, Fresno residents can start joining city council meetings virtually, where they can also make a public comment. City councilman Nick Richardson says RPs could attend that way if they were prohibited from being there physically. But that is NOT the same as being there in person.

If Fresno (or California) passes such a bill banning RPs from attending public meetings, they will likely lose. In 2023, Brevard County, FL had settled with three Registered Persons. Of course, the circumstances were slightly different than that of Fresno CA; Brevard County has a residency restriction ordinance that, with some exceptions, prohibits RPs from being within 1,000 feet of a school, day care center, park or playground. Violators are subject to up to 60 days in jail and up to a $500 fine. Because the Brevard County Government Center in Viera is within 1,000 feet of a school — and the ordinance had no exceptions for attending public meetings — RPs were prohibited from attending County Commission meetings. As part of the settlement, the county agreed to pay damages of $2,500 each to the three plaintiffs, plus pay $150,000 for plaintiffs' attorney fees.

But these vile politicians wish to take this a step further. On Feb. 20, 2026, CA State Assemblywoman Esmeralda Soria announced AB 2753, which will prohibit anyone who has ever been forced to register on the sex offense registry from running for any public office in the state. Fresno city council people have stated they support this bill and plan to pass such a law at the local level. On 4/16/2026, the Assembly Elections subcommittee passed the bill unanimously, and on 5/7/2026, it unanimously passed the Assembly.

A REVIEW OF J. THORNE BLACKWELL'S 2025 BOOK "BEYOND THE LABEL: NAVIGATING THE SEX OFFENDER REGISTRY AND REBUILDING YOUR FUTURE"

I am loathe to give bad reviews to books that are written to provide info to RPs, but after reading this book for myself, and hearing concerns from a couple of readers, I have decided to cover my thoughts on this book.

On the back of the book, J. Thorne Blackwell claims to be a "leading voice in the fight for post-conviction justice and reform" and claims to be "one of the founding members of Penumbra Research. He also claims to be a former paralegal & policy analyst. I asked my sole contact at NARSOL's BOD and members of other groups about this. He asked around and knew no one of that name, nor does anyone he asked know of him. If this "Penumbra Research" does exist it is buried deep in the bowels of the Internet as there is a company that has that name that does medical research and equipment sales. I know man writers on this subject may use aliases but people still know who they are.

I found some contradictions in the book. In section 2.2.3, for example, it says Uber/Lyft bans us from being hired by them. That's actually true. BUT then in section 7.3.2, he says Uber and Lyft don't do background checks (untrue, because they do) so it may be a good job. It claims expungement for registry removal is a possibility but. The book suggests people sign up for NARSOL and RSOL... NARSOL used to be known as RSOL and so he's talking about the same place unless he meant the state affiliates of NARSOL, but only a couple of state groups use the RSOL moniker, just PARSOL and WVRSOL off the top of my head. It also suggests joining SOSEN but SOSEN went defunct in 2024 and only prisoners never got the memo. Finally, I saw a lot of the same exact advice repeated verbatim in multiple parts of the book.

I strongly believe this book was AI assisted, if not fully written by AI. It reads like Google Gemini's AI overview. Whenever someone uses Google and types in a subject, before you even see the top result, you'll get an "AI Overview": I found it to be incorrect more often than not. So I did not add this to my list of recommended reading. I have it a 3 star review on Amazon but I left off some of the criticisms I just told you about. But if you just need something to read, it does still have some decent tips in it.

As an aside, a decade or so ago this guy was drafting a registry survival guide but for some dumb reason he insisted on naming the book "Sickos?" (It is for sale on Amazon. ""Sickos?" - A Survival Guide for Sex Offenders, Survivors and Society." published 2015). He got angry with me because I told him I wouldn't promote a book with that as a title. Another person (unsure if ever published) also wanted to write about his life story as a Registered Person, and he wanted to call it "Touched." And this was during the Jerry Sandusky trial. Sandusky's memoir written long before the alleged Penn State scandal was called "Touched". Sometimes I think folks are trolling but if serious, they don't think things through.

But I do have one new book recommendation for those of you who in the federal system and are deciding whether or not to take the SOTP. *"The Federal Sex Offender Treatment Program: What you need to know and should you go"* by Jesse Ward (2025) is available for $12.99 (plus S&H) from Amazon.com, and it will answer a lot of your questions about how the SOTP operates and what to expect. It is a short read, just 75 pages, but I found it to be very informative and useful, especially given that the BOP doesn't like to let folks know what the program actually does. But this book will dispel some myths and help you decide if you should take this program (hint: some folks DO really need to take the SOTP.)