

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

UNITED STATES OF AMERICA

Case No. 6:15-CR-00113-MC

v.

SUPERSEDING INDICTMENT

RONALD D. JOLING and
DOROTHEA J. JOLING,

**Count 1: Conspiracy to File False
Retaliatory Liens**
18 U.S.C. § 1521

Defendants.

**Counts 2 thru 5: Filing False Retaliatory
Liens**
18 U.S.C. §§ 1521 and 2

THE GRAND JURY CHARGES:

At times relevant to this Superseding Indictment:

INTRODUCTORY ALLEGATIONS

1. RONALD D. JOLING and DOROTHEA J. JOLING (hereinafter collectively referred to as “the JOLINGS”) were husband and wife.
2. The JOLINGS resided in the District of Oregon.
3. In or about October of 2011, a federal Grand Jury indicted the JOLINGS in the District of Oregon on various criminal charges related to their individual federal income taxes, in *United States v. Joling et al.*, No. 6:11-cr-60131 (hereinafter “JOLINGS’ criminal tax case”).
4. Chief United States District Judge Ann Aiken (“Chief Judge Aiken”) was assigned to and presided over the JOLINGS’ criminal tax case.

5. United States Magistrate Judge Thomas M. Coffin (“Magistrate Judge Coffin”) was the Magistrate Judge assigned to the JOLINGS’ criminal tax case.

6. Mary L. Moran (Moran) served as the Clerk of Court for the United States District Court for the District of Oregon during the JOLINGS’ criminal tax case.

7. Assistant United States Attorney Scott E. Bradford (Bradford) prosecuted the JOLINGS’ criminal tax case.

COUNT 1
(Conspiracy to File False Retaliatory Liens)

The Introductory Allegations contained in paragraphs 1 through 7 of this Superseding Indictment are re-alleged and incorporated herein as if copied verbatim.

8. From on or about August 15, 2013, through on or about February 26, 2014, in the District of Oregon and elsewhere, the defendants, RONALD D. JOLING and DOROTHEA J. JOLING, knowingly conspired with each other and with others, known and unknown to the Grand Jury, to file and cause to be filed in the public record, via the California Secretary of State’s website, false liens and encumbrances, in the amount of \$100,003,000, against the real and personal property of officers and employees of the United States, on account of the officers’ and employees’ performance of official duties in the JOLINGS criminal tax case, knowing and having reason to know that the liens and encumbrances were false and contained materially false, fictitious, and fraudulent statements and representations. The officers and employees against whom the JOLINGS conspired to file and cause to be filed the false liens and encumbrances included a United States District Judge, a United States Magistrate Judge, the Clerk of the Court, and an Assistant United States Attorney, all in the District of Oregon (the “individual victims”). In order to effect the object of the conspiracy, the JOLINGS prepared and caused to be prepared the false liens and encumbrances and other documents related thereto,

including but not limited to UCC Financing Statements and a “Notice of Security Interest with Intent to Perfect.”

In violation of Title 18, United States Code, Section 1521.

COUNT 2
(False Retaliatory Liens)

The Introductory Allegations contained in Paragraphs 1, 2, 3, and 4 of this Superseding Indictment are re-alleged and incorporated herein as if copied verbatim.

9. On or about February 25, 2014, through on or about February 26, 2014, in the District of Oregon and elsewhere, defendants RONALD D. JOLING and DOROTHEA J. JOLING, aided and abetted by each other and others, known and unknown to the grand jury, attempted to file, filed, and caused to be filed in the public records of the State of California, via the California Secretary of State’s website, false liens and encumbrances titled UCC Financing Statements, in the amount of \$100,003,000, against the real and personal property of Chief Judge Aiken, who was an officer and employee of the United States government. Knowing and having reason to know that the liens and encumbrances were false and contained materially false, fictitious, and fraudulent statements and representations – including a false statement that Chief Judge Aiken owed the JOLINGS \$100,003,000 – the JOLINGS caused the false liens and encumbrances to be filed against Chief Judge Aiken on account of the performance of her official duties relating to the JOLINGS’ criminal tax case.

In violation of Title 18, United States Code, Sections 1521 and 2.

COUNT 3
(False Retaliatory Liens)

The Introductory Allegations contained in Paragraphs 1, 2, 3 and 5 of this Superseding Indictment are re-alleged and incorporated herein as if copied verbatim.

10. On or about February 25, 2014, through on or about February 26, 2014, in the District of Oregon and elsewhere, defendants RONALD D. JOLING and DOROTHEA J. JOLING, aided and abetted by each other and others, known and unknown to the grand jury, attempted to file, filed, and caused to be filed in the public records of the State of California, via the California Secretary of State's website, false liens and encumbrances titled UCC Financing Statements, in the amount of \$100,003,000, against the real and personal property of Magistrate Judge Coffin, who was an officer and employee of the United States government. Knowing and having reason to know that the liens and encumbrances were false and contained materially false, fictitious, and fraudulent statements and representations – including a false statement that Magistrate Judge Coffin owed the JOLINGS \$100,003,000 – the JOLINGS caused the false liens and encumbrances to be filed against Magistrate Judge Coffin on account of the performance of his official duties relating to JOLINGS' criminal tax case.

In violation of Title 18, United States Code, Sections 1521 and 2.

COUNT 4
(False Retaliatory Liens)

The Introductory Allegations contained in Paragraphs 1, 2, 3 and 6 of this Superseding Indictment are re-alleged and incorporated herein as if copied verbatim.

11. On or about February 25, 2014, through on or about February 26, 2014, in the District of Oregon and elsewhere, defendants RONALD D. JOLING and DOROTHEA J. JOLING, aided and abetted by each other and others, known and unknown to the grand jury,

attempted to file, filed, and caused to be filed in the public records of the State of California, via the California Secretary of State's website, false liens and encumbrances titled UCC Financing Statements, in the amount of \$100,003,000, against the real and personal property of Clerk of Court Mary L. Moran, who was an officer and employee of the United States government. Knowing and having reason to know that the liens and encumbrances were false and contained materially false, fictitious, and fraudulent statements and representations – including a false statement that Moran owed the JOLINGS \$100,003,000 – the JOLINGS caused the false liens and encumbrances to be filed against Moran on account of the performance of her official duties relating to the JOLINGS' criminal tax case.

In violation of Title 18, United States Code, Sections 1521 and 2.

COUNT 5
(False Retaliatory Liens)

The Introductory Allegations contained in Paragraphs 1, 2, 3 and 7 of this Superseding Indictment are re-alleged and incorporated herein as if copied verbatim.

12. On or about February 25, 2014, through on or about February 26, 2014, in the District of Oregon and elsewhere, defendants RONALD D. JOLING and DOROTHEA J. JOLING, aided and abetted by each other and others, known and unknown to the grand jury, attempted to file, filed, and caused to be filed in the public records of the State of California, via the California Secretary of State's website, false liens and encumbrances titled UCC Financing Statements, in the amount of \$100,003,000, against the real and personal property of Assistant United States Attorney Scott E. Bradford, who was an officer and employee of the United States government. Knowing and having reason to know that the liens and encumbrances were false and contained materially false, fictitious, and fraudulent statements and representations – including a false statement that Bradford owed the JOLINGS \$100,003,000 – the JOLINGS

caused the false liens and encumbrances to be filed against Bradford on account of the performance of his official duties relating to the JOLINGS' criminal tax case.

In violation of Title 18, United States Code, Sections 1521 and 2.

DATED this 19th day of November 2015.

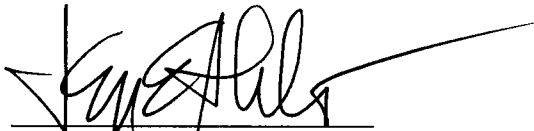
A TRUE BILL



Presented by:

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