

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

SARAH WASILEWSKI,

Plaintiff

v.

**CIVIL ACTION
NO. _____
JURY TRIAL DEMANDED**

Special Agent. Ryan Long,

Defendant

COMPLAINT

PRELIMINARY STATEMENT

This is a civil rights action brought under 42 U.S.C. § 1983 and raising supplemental state law claims against Defendant, individual Georgia Bureau of Investigation officer, concerning their unlawful detention and arrest, use of excessive force, and malicious prosecution of Sarah Wasilewski on, around, and/or after January 18, 2023.

JURISDICTION & VENUE

1. This Court has jurisdiction over the subject matter of the complaint under 42 U.S.C. § 1983 and 28 U.S.C. §§ 1331 and 1343. Additionally, this Court has supplementary jurisdiction over state law claims under 28 U.S.C. § 1367.

2. Venue is proper where a substantial portion of the events giving rise to this suit took place within this district and where, on information and belief, Defendant resides in this district.

PARTIES

Plaintiff

3. Plaintiff Sarah Wasilewski is a resident of Pittsburgh, PA. Ms Wasilewski, a seasonal sustainable landcare professional, was on an extended vacation travelling through Georgia during the week of January 18, 2023. She is an environmentalist and outdoor recreational enthusiast, often traveling between public lands and green spaces in the southern United States during her off-season.

Defendants

4. Defendant Special Agent RA Long is or was, at all times relevant, an officer of the Georgia Bureau of Investigations. As described herein, Defendant Long detained Ms. Wasilewski without reasonable suspicion and arrested her without probable cause. He is sued in his individual capacity. Defendant Long swore out warrants for Ms. Wasilewski's prosecution that were false.

FACTUAL ALLEGATIONS

5. Ms. Wasilewski was travelling through Atlanta during the week of January 18, 2023 with her partner at the time, Spencer Liberto.
6. Ms. Wasilewski often sleeps in her car while traveling and parked her 2008 Mitsubishi Lancer at a WalMart parking lot on January 17th.
7. On the morning of January 18th, Ms Wasilewski was in a hammock in Intrenchment Creek park.
8. Intrenchment Creek Park is owned by DeKalb County.
9. Intrenchment Creek Park is not owned, leased, or controlled by the city of Atlanta.
10. Intrenchment Creek Park is not the location of the police training center.
11. On the morning of the operation to clear Intrenchment Creek Park, Defendant Long issued a directive to the law enforcement personnel clearing the forest that any person found in Intrenchment Creek Park should be arrested immediately.
12. At approximately 8am A group of officers from the GBI, Dekalb County Police Department and Atlanta Police Department in full combat gear, conducted a raid on the public park.
13. Ms Wasilewski was surrounded by approximately 15 officers with drawn semi-automatic weapons.
14. An unknown officer under the direction of SA Long announced that they were the police and to come out of the "tent" but did not indicate why.
15. Ms Wasilewski responded that she needed to put clothes on.
16. An unknown officer told Ms Wasilewski that she was taking too long and that it "isn't a fashion show".
17. Upon exiting the hammock, Ms Wasilewski asked the officers not to point their

- rifles in her face.
18. Officers kept weapons drawn.
 19. Ms Wasilewski asked what was going on and if she was being arrested.
 20. First officer responded "Yes."
 21. Ms Wasilewski then further questioned why.
 22. Officer said "For trespassing, at this time".
 23. Ms Wasilewski was hammocking in a public park.
 24. There are no posted "no trespassing" signs near where Ms Wasilewski was hammocking.
 25. Defendant never asked Ms Wasilewski to leave.
 26. Ms Wasilewski's hammock was slashed with a knife by an unknown officer.
 27. Ms Wasilewski was zip-tie hand-cuffed and transferred by defendant to taken by Dekalb officers to a transport vehicle.
 28. While waiting to be put into the vehicle, Ms Wasilewski heard a barrage of gunshots which terrified and confused her.
 29. At the time of the gunshots, the officer detaining Ms. Wasilewski verbally responded, acknowledging the intensity and length of the shots heard.
 30. Later, Ms Wasilewski was falsely booked in the Dekalb County jail with charges of Aggravated Assault Against Law Enforcement Officer When Engaged on Official Duty Statute 16-5-21(c) GA.
 31. There is no basis for this charge.
 32. Ms Wasilewski was detained and in police custody at the time of the gunshots.
 33. Ms Wasilewski fully complied with all officers involved during her arrest.

34. No probable cause or arguable probable cause existed for any of the defendants to suggest Ms. Wasilewski was responsible, through any theory of liability, for the offenses charged.
35. Ms Wasilewski was transported by Dekalb County officers to the Georgia Crime Information Center with 4 others and separated into individual rooms.
36. Ms Wasilewski was left handcuffed to a desk for an hour without water or food.
37. Ms Wasilewski was then questioned by a man who identified himself from the District Attorneys office and another unknown woman, under the premise of "A police officer was injured today"
38. Ms. Wasilewski was later booked with "Statute 16-11-220 Domestic Terrorism"
39. Ms Wasilewski was booked in the Dekalb County jail and put onto the highest level security floor due to the extremity of her charges.
40. Ms. Wasilewski suffered psychological and emotional distress while incarcerated for 4 days.
41. Ms Wasilewski was not provided with her medication while incarcerated.
42. Eventually, Ms. Wasilewski was released on a \$15,000 bond.
43. Ms Wasilewski's vehicle was seized on January 18th 2023 by the GBI Crime dept and held for 3 months.
44. There is no search warrant for Ms Wasilewski's car.
45. Ms Wasilewski received a notice that her vehicle was released to South Dekalb Towing & Transport, Inc, and required \$367 plus \$15 daily storage fee.
46. Ms. Wasilewski did not receive her vehicle until March 3, 2023.
47. Ms Wasilewski suffered major inconvenience and stress not having her vehicle for

transportation especially during the cold winter months in Pittsburgh.

48. The allegations contained in the police reports and warrants, and allegations generally made by Defendant, became the basis for Ms. Wasilewski's prosecution as a RICO co- conspirator in Fulton County.
49. Specifically, Ms. Wasilewski was indicted as a RICO co-conspirator by grand jury indictment on August 29th, 2023 in Fulton County.
50. The indictment alleges that Ms. Wasilewski is a RICO co-conspirator where she allegedly "did attempt occupy the Dekalb forest with camouflauge, camping gear, and living supplies." See Exhibit B (containing relevant excerpts from the indictment).
51. No basis for her prosecution in Fulton County exists other than the false allegations against her made by Defendant.
52. Ms. Wasilewski has suffered greatly as a result of the events described supra.
53. Ms. Wasilewski suffered significant pain and distress as a result of being witness to a murder.
54. Ms. Wasilewski suffered psychological distress by being kept in jail for 4 days in squalid conditions.
55. As a result of her arrest, Ms. Wasilewski was publicly humiliated and "doxxed" online by others accusing her of involvement in crimes she did not commit but was nonetheless arrested and charged with.
56. Ms. Wasilewski's employer's were contacted by news agencies and harassed online.
57. Ms Wasilewski's reputation and as a professional has suffered as a result of this

public shaming which was caused by Defendants' actions.

58. Furthermore, Ms. Wasilewski's career and personal life has been disrupted as a result of continuing to have to travel to Fulton and Dekalb County from Pittsburgh, Pennsylvania, to answer the ongoing charges against her which resulted from Defendants' actions.
59. This process has also been costly, requiring her to purchase flights and accommodations.
60. Because Ms. Wasilewski's detention and arrest and the subsequent transpiring events described above are attempting to criminalize lawful participation in a political demonstration, Ms. Wasilewski's rights of expression have been chilled.
61. As a result of her arrest, Ms. Wasilewski's bond conditions require that she avoid the Atlanta Forest, and that she have no contact with those she was arrested with, including her partner at the time. This has not only caused Ms. Wasilewski great personal and emotional suffering, but has placed significant strains on her relationships and housing.
62. Ms. Wasilewski expresses concern and weariness about participating in political speech or assembly because of the ordeal she has suffered.
63. Finally, Ms. Wasilewski has experienced great emotional and psychological trauma as a result of this ordeal, necessitating professional healthcare intervention.

CLAIMS FOR RELIEF

COUNT I

False Arrest / Unlawful Detention / Retaliatory Arrest & Selective Prosecution U.S. Const. Amends. I, IV and XIV and 42. U.S.C. § 1983 Against All Defendants

64. The state warrant affidavit states Ms. Wasilewski's crime as "16-7-21 Criminal Trespass"

explained as "entering and remaining on private property posted with No trespassing signs."

65. As of January 18, 2023 Intrenchment Creek Park had paved and unpaved trails used by the public for outdoor recreation.
66. Even after January 18, 2023, Intrenchment Creek Park continued to be used as a public park, outdoor recreational space, venue for artistic expression, political speech, and political gatherings.
67. As of January 18, 2023, the property on which Ms Wasilewski was arrested was public land and open for public use.
68. As of January 18, 2023, there was no federal, state, local, or municipal law that prohibited camping overnight inside Intrenchment Creek Park.
69. Intrenchment Creek Park was not closed to the public until March 24, 2023, after the Chief Executive Officer of DeKalb County issued executive order 2023-001.
70. On and before January 18, 2023, there were no signs indicating that area was off limits or warned that camping would amount to trespassing.
71. On the morning of the operation to clear Intrenchment Creek Park, Defendant Long issued a directive to the law enforcement personnel clearing the forest that any person found in Intrenchment Creek Park should be arrested immediately.
72. Prior to that morning's operation, no Defendant was informed that they had the authority to issue criminal trespass warnings to bar individuals from Intrenchment Creek Park.
73. Defendant Long had both visited Intrenchment Creek Park prior to the raid and knew that the area plaintiff was arrested was owned by DeKalb County, and not part of the City of Atlanta's proposed training center.

74. Neither the GBI nor the City of Atlanta had the authority to exclude any person from Intrenchment Creek Park.
75. While hammocking in Intrenchment Creek Park, Ms Wasilewski was not on property owned by the City of Atlanta.
76. On the arrest warrant affidavit, the Defendant alleged that Ms Wasilewski was "participating in actions as part of the Defend The Atlanta Forest (DTAF) , a group classified by the United States Department of Homeland Security as Domestic Violent Extremists."
77. The United States Department of Homeland Security does not designate groups or have a list of "Domestic Violent Extremists".
78. Even assuming arguendo that arresting officers had obtained sufficient information to arrest Ms. Wasilewski with arguable or actual probable cause, any information gathered to arrest her was the result of an unlawful initial detention and can therefore not provide any legal basis for her subsequent arrest.
79. This is wrongful arrest because there was no probable cause for arrest.
80. Where Defendants had no reasonable suspicion or probable cause to detain and arrest Ms. Wasilewski, and did so based on their belief that she participated in a lawful protest, Defendants' unlawful detention and arrest were retaliatory and unlawful.
81. Furthermore, even were some reasonable suspicion or probable cause could have existed in arguendo, Defendants' decision to detain and arrest her as a result of her participation in protected speech constitutes selective enforcement and is therefore unlawful.
82. Ms. Wasilewski's damages, including her pain and suffering described supra, were proximately caused by Defendants' unlawful detention and arrest.

COUNT III
Malicious Prosecution
O.C.G.A. Sec. 51-7-40
Against All Defendants

83. Defendant had an obligation not to carry out a criminal prosecution of Ms. Wasilewski maliciously and without probable cause, causing her damage.
84. Defendant violated this obligation by swearing out warrants against Ms. Wasilewski and making statements and allegations that became the basis of her prosecution in Fulton County.
85. Defendant played a role in the resulting initiation of legal process and prosecution embodied in both the arrest warrants and the grand jury indictment.
86. No factual basis existed for the arrest warrants or for the allegations indicated in the indictment, and Defendant had no reason to believe they did.
87. Nonetheless, they proximately caused the issuance of the warrants and the grand jury indictment.
88. Defendant's actions in issuing the warrants and causing the grand jury indictment proximately caused the damages to Ms. Wasilewski described supra.

PRAYER FOR RELIEF

WHEREFORE, Ms. Wasilewski respectfully requests:

1. A trial by jury;
2. Compensatory Damages as to all Defendants;

3. Punitive Damages as to all Defendants;
4. Reasonable attorneys' fees and costs pursuant to 42 U.S.C. § 1988(b) & (c) and as otherwise permitted by law;
5. Any additional relief that this Court deems just and proper.

Respectfully submitted this 16th day of January, 2025.

/s/ Sarah Wasilewski
230 Evergreen Ave
Pittsburgh, PA 15209
Sarahwoshe@gmail.com

Exhibit A

STATE WARRANT AND MITTIMUS

AFFIDAVIT

Georgia, DeKalb County
Personally came SA R. Long who on oath says that, to the best of his knowledge
and
belief, Sarah Wasilewski did, in the County aforesaid, commit the offense, of, **TO-WIT**
16-7-21 Criminal Trespass in said County, between the hours of
8:00 AM and 5:00 PM on the 18 day of January, 20 23. The place of
occurrence of said offense being 1600 Constitution Road, Atlanta, DeKalb County, Georgia
and against the laws of the State of Georgia. Said offense being described as:
Entering and remaining on private property posted with No Trespassing signs.

and thus deponent makes this affidavit that a warrant may issue for his arrest.

[Signature]
Affiant
[Signature]

Sworn to and subscribed me before me this the 19th day of January 2023.

Judge

WARRANT

Georgia, DeKalb County
To any Sheriff or his deputy, Coroner, Constable, or Marshall of said state, GREETING:
For sufficient causes made known to me in the above affidavit, you are hereby commanded to arrest
Sarah Waslewski the defendant named in the foregoing affidavit charged by
the prosecutor therein with the offense against the laws of this State as enunciated in said affidavit and bring him before
me or some other Judicial Officer of this State to be dealt with as the law directs.

Herein fail not. This the 19th day of January 2023.

[Signature]
Judge

ORDER

Georgia, DeKalb County
After hearing the evidence in the above case it is ordered that said defendant be bound in a bond
of _____
Dollars for his appearance on the first day at the next term or session after this day of the
Court of _____ to be held in and for said County to answer the charge of

In default thereof that he be committed to the common jail of said County, there to be safely kept until thence delivered by
due course of law.

Given under my hand and seal this the 19th day of January 2023.

Judge (L.S.)

Exhibit B

Sex Female (2023-01-18) Race White (2023-01-18)
Height 5'07" (2023-01-18) Weight 185 (2023-01-18) Date of Birth 1987-09-14 (2023-01-19)

Hair Color Gray Or Partially Gray (2023-01-18) Eye Color Brown (2023-01-18)

Place of Birth PENNSYLVANIA (2023-01-18)

Miscellaneous Information
III Record SSO

***** CRIMINAL HISTORY *****

===== OTN 88430960800 (Cycle 1 of 1)
=====

Offender Tracking Number (OTN) 88430960800
Earliest Event Date 2023-01-18
Offense Date 2023-01-18

Arrest (Cycle 1)
Arrest Date 2023-01-18
Arresting Agency GAGBI0000 GBI HEADQUARTERS
Subject's Name WASILEWSKI, SARAH
Arrest Type Adult

Charge 1
Charge Tracking Number 88430960800-1
Charge Literal DOMESTIC TERRORISM
Statute 16-11-220; GA
NCIC Offense Code 1602
State Offense Code 0017
Severity Felony

Charge Tracking Number 88430960800-2
Charge Literal AGGRAVATED ASSAULT AGAINST LAW
ENFORCEMENT OFFICER WHEN ENGAGED ON OFFICIAL DUTY
Statute 16-5-21(c); GA
NCIC Offense Code 1399
State Offense Code 1327
Severity Felony

***** INDEX OF AGENCIES *****

Agency GBI HEADQUARTERS; GAGBI0000;
GEORGIA CRIME INFORMATION CENTER
Agency Telephone (404) 244-2639
Agency Facsimile 4042442639
Address PO BOX 370808
DECATUR, GA 30037-0808

*** END OF RECORD ***

Exhibit C

STATE WARRANT AND MITTIMUS

AFFIDAVIT

Georgia, DeKalb County
Personally came SA R. Long who on oath says that, to the best of his knowledge and belief, Sarah Wasilewski did, in the County aforesaid, commit the offense, of, **TO-WIT** 16-11-220 Domestic Terrorism in said County, between the hours of 8:00 AM and 5:00 PM on the 18 day of January, 20 23. The place of occurrence of said offense being 1600 Constitution Road, Atlanta, DeKalb County, Georgia

and against the laws of the State of Georgia. Said offense being described as: participating in actions as part of Defend the Atlanta Forest (DTAF), a group classified by the United States Department of Homeland Security as Domestic Violent Extremists. Said group has publicly claimed responsibility for numerous acts while stating their intent was to intimidate employees of the government and private companies into not accepting or completing tasks in and around the site of the Atlanta Police Training Center. These acts have included vandalism at offices and private residences; throwing Molotov cocktails, rocks, and fireworks at uniformed police officers; arson of public buildings, heavy equipment, private buildings, and private vehicles; shooting metal ball bearings at contractors; discharging firearms at critical infrastructure; preventing access to private land; and several other violations of law. These claims of responsibility have been made on websites, social media, and graffiti "tagging". The accused affirmed their cooperation with DTAF by criminally trespassing on posted land and admitting during an interview that she was aware of "Cop City" prior to traveling to Atlanta and had pre-planned sleeping on the land. Said defendant admitted to participating in previous protests in other states for environmental causes. Said accused was also present on the property during the shooting of a State Trooper by an activist, which resulted in serious injury, and the subsequent shooting of said activist, resulting in death.

and thus deponent makes this affidavit that a warrant may issue for his arrest.


Affiant

Sworn to and subscribed me before me this the 19th day of January 2023.



Judge

WARRANT

Georgia, DeKalb County
To any Sheriff or his deputy, Coroner, Constable, or Marshall of said state, GREETING:
For sufficient causes made known to me in the above affidavit, you are hereby commanded to arrest Sarah Wasilewski the defendant named in the foregoing affidavit charged by the prosecutor therein with the offense against the laws of this State as enunciated in said affidavit and bring him before me or some other Judicial Officer of this State to be dealt with as the law directs.

Herein fail not. This the 19th day of January 2023.


Judge

ORDER

Georgia, DeKalb County
After hearing the evidence in the above case it is ordered that said defendant be bound in a bond of _____ Dollars for his appearance on the first day at the next term or session after this day of the Court of _____ to be held in and for said County to answer the charge of _____

In default thereof that he be committed to the common jail of said County, there to be safely kept until thence delivered by due course of law.

Given under my hand and seal this the 19th day of January 2023.

Judge (L.S.)

Exhibit D

**ABANDONED MOTOR VEHICLE NOTICE
(South DeKalb Towing & Transport, Inc.)**

Owner Name: SARAH WASILEWSKI 7022 2410 0003 0516 9301
Owner Address: 3221 MARY ST
Pittsburgh PA 15203
Vehicle Make: Mitsubishi Year: 2008 Model: Lancer
Vehicle ID (VIN)#: JA3AU26U38U042079 Vehicle License #: HXK7592 State: PA

Dear Owner:

You have been identified as an owner of the above-referenced vehicle, which is currently being held at the business listed below, and are being notified in accordance with OCGA 40-11-19(a)(1). The following fees are currently due:

\$367.00 Fees associated with removal of the vehicle
\$15.00 Daily fee for storage of the vehicle

Daily fees will accrue until full payment has been made at the rate of **\$ 15.00** per day. Additional fees that are recoverable by a towing or storage firm include fees for obtaining the owner's information, notifying the owner (including advertising, if necessary), court filing costs, attorney's fees, and interest.

The towing and storage firm has the right to petition a court to foreclose a lien for all amounts owed after 10 calendar days from the date this notice was sent. If the lien is foreclosed, a court shall order the sale of the vehicle to satisfy the debt.

If you wish to disclaim ownership in this vehicle, complete and return the form found on the next page / back of this letter. Disclaiming ownership and judgement of foreclosure being entered shall result in the holding of an auction.

The excess proceeds (if any), that may exist shall be deposited with the Department of Revenue and be treated as unclaimed property. Disposition of such property shall be governed pursuant to O.C.G.A. 44-12-211.1

Please contact us immediately, or we will avail ourselves to all remedies allowed by law.

The vehicle is currently located at _____
Anyone with an ownership interest in this vehicle should contact the following business immediately.

Business Name: South DeKalb Towing & Transport, Inc.
Address: 7043 Rogers Lake Rd
Lithonia GA 30058
Telephone #: (404) 508-0246

MAG 40-03

Damon Parker

Towtrack: GA_4003A.rpt 190909

Exhibit E

D 2:30
10-7 2:45
10-8 3:00
AREA 3:15

INTEL 2124 KIC
SOUTH DEKALB TOWING & TRANSPORT
7043 Rogers Lake Road
Lithonia, GA 30058
404-508-0246

93212
TICKET NUMBER
1-18-23
DATE
JAMES H.
DRIVER

VEHICLE OWNER _____
OWNER ADDRESS _____
DESTINATION OF CALL Walmart Gresham Rd
DESTINATION OF RELAY _____
TOWABLE? YES / NO DRIVABLE? YES / NO RADIO? YES / NO KEYS? YES / NO
TOWED TO _____

V.I.N.# J A 3 A W 2 6 4 3 8 4 0 4 2 0 7 9
YEAR 2008 MAKE Mitsubishi MODEL Lancer COLOR Blue
MILEAGE _____ LICENSE NO. _____ STATE/YR. Pa TAG NO. HYK-7592
OFFICER SIGNATURE _____ CASE NO. 23-005265
DAMAGE ON VEHICLE Front bumper Hood Pass side Trunk
INVENTORIED AT SCENE? YES / NO

REMARKS

7 DAY ADMIN. FEE	STANDARD DEKALB COUNTY CONTRACT RATES BY: PAID MAR 03 2023	TOWING	
30 ADMIN. FEE		SMALL \$ 75.00	STORAGE
LIEN FEES		MEDIUM \$ 90.00	EXTRA MILE
SECOND TRUCK		LARGE \$ 120.00	EXTRA TIME
WINCHING			RELAY
DEKALB FEE		OTHER	
		TOTAL <u>155</u>	

SOUTH DEKALB TRANSPORT & STORAGE IS NOT RESPONSIBLE FOR ANY DAMAGES OR CLAIMS RESULTING FROM FAULTY EQUIPMENT OR HAZARDOUS SITUATIONS. I HAVE RECEIVED THE ABOVE VEHICLE AND CONTENTS AND HAVE NO COMPLAINTS AGAINST SOUTH DEKALB TRANSPORT & STORAGE.

SIGNATURE

DATE

IRF-BRIAN
YELLOW - CUSTOMER COPY

3/3/23
PINK - DRIVER'S COPY

Exhibit F

INDICTMENT

Fulton County Superior Court
FILED ET
Date: 8/29/2023
Che Alexander, Clerk of Court

Clerk No. 23SC189192

FULTON COUNTY SUPERIOR COURT

JULY 2023 TERM

STATE OF GEORGIA

v.

Beamon, Jack Morgan
Biederman, Max Jacob
Bilodeau, Timothy E.
Bogush, Emma Katherine
Carlisle, Andrew
Carroll, Francis M.
Chaoui, Amin Jalal
Courtemanche, Brooke Elaine
Dorsey, Colin Patrick
DuPuis, Julia Caroline
Ebaugh, Ariel Caitlin
Ellis, Lillian Pearl
Feola, Madeleine
Ferguson, Ivan James
Flagg, Phillip Allen
Gates, Maggie June

Geier, Nadja
Grim, Priscilla Christine
Gupta, Sonali
Harper, Luke Edward
Hertel, Serena Abby
Hoitt-Lange, Marianna Elizabeth
Jurgens, Thomas Webb
Kass, Hannah Margaret
Kautz, Marlon Scott
King, Ayla Elegia
Kloth, Katie Marie
Kodat, Madeleine Gunther
Larmey, Zoe C.
Lee, Ana Gypsy
LeNy, Dimitri Roger
Liberto, Spencer Bernard
Luini, Mattia
Macar, Matthew Ernest
MacLean, Adele Garrett
Marsicano, James Lee
Martin, Grace Taylor
Meissner, Kayley Cheryl
Murphy, Emily
Murphy, Timothy A.R.
Norman, Tyler John
Novak, Leif Kingfisher Nicholas
Nottingham, Ehret William

Olson, Nicholas Dean

Papali, Alexis Achilles

Parsons, Geoffrey

Patterson, Savannah D.

Pipes, Kamryn Durel

Puertas, Victor Enrique

Reynolds, Christopher

Robert-Paul, Fredrique

Robinson, Arieon T.

Shen, Teresa Yue

Skapyak, Abigail Elizabeth

Tennenbaum, Caroline Hart

Tilbury, Geneva Rose

Vassail, Abeeku Osei

Voiselle, Leonard Zen AKA Leonardo Zen

Ward, Samuel Clemens

Warren, William Budden

Wasalewski, Sarah

Filed in office:

..... Grand Jury Bailiff

Date: August 29

2023

..... Clerk, S. C.

BILL

COUNT 1 - RACKETEERING

The Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, charge and accuse JACK MORGAN BEAMON, MAX JACOB BIEDERMAN, TIMOTHY E. BILODEAU, EMMA KATHERINE BOGUSH, ANDREW CARLISLE, FRANCIS M. CARROLL, AMIN JALAL CHAOUI, BROOKE ELAINE COURTEMANCHE A.K.A. BROOKE ELAINE COURTEMANCHE, COLIN PATRICK DORSEY, JULIA CAROLINE DUPUIS, ARIEL CAITLIN EBAUGH, LILLIAN PEARL ELLIS, MADELEINE FEOLA, IVAN JAMES FERGUSON, PHILLIP ALLEN FLAGG, MAGGIE JUNE GATES, NADJA GEIER, PRISCILLA CHRISTINE GRIM, SONALI GUPTA, LUKE EDWARD HARPER, SERENA ABBY HERTEL, MARIANNA ELIZABETH HOITT-LANGE, THOMAS WEBB JURGENS, HANNAH MARGARET KASS, MARLON SCOTT KAUTZ, AYL A ELEGIA KING, KATIE MARIE KLOTH, MADELEINE GUNTHER KODAT, ZOE C. LARMEY, ANA GYPSY LEE, DIMITRI ROGER LENY, SPENCER BERNARD LIBERTO, MATTIA LUINI, MATTHEW ERNEST MACAR, ADELE GARRETT MACLEAN, JAMES LEE MARSICANO, GRACE TAYLOR MARTIN, KAYLEY CHERYL MEISSNER, EMILY MURPHY, TIMOTHY A.R. MURPHY, TYLER JOHN NORMAN, EHRET WILLIAM NOTTINGHAM, LEIF KINGFISHER NICHOLAS NOVAK, NICHOLAS DEAN OLSON, ALEXIS ACHILLES PAPALI, GEOFFREY PARSONS, SAVANNAH D. PATTERSON, KAMRYN DUREL PIPES, VICTOR ENRIQUE PUERTAS, CHRISTOPHER REYNOLDS, FREDRIQUE ROBERT-PAUL, ARIEON T. ROBINSON, TERESA YUE SHEN, ABAGAIL ELIZABETH SKAPYAK, CAROLINE HART TENNENBAUM, GENEVA ROSE TILBURY, ABEEKU OSEI VASSAIL, LEONARD ZEN VOISELLE AKA LEONARDO ZEN VOISELLE, SAMUEL CLEMENS WARD, WILLIAM BUDDEN WARREN, AND SARAH

WASALEWSKI (hereafter referred to collectively as "**THE ACCUSED**" in **Count 1**), with the offense of **VIOLATION OF THE GEORGIA RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS ACT, O.C.G.A. § 16-14-4(c)**, for the said accused, individually and as persons concerned in the commission of a crime, and together with unindicted co-conspirators, in the State of Georgia and the County of Fulton, on or between May 25, 2020 and August 25, 2023, while associated with an enterprise, did unlawfully conspire and endeavor to conduct and participate in, directly and indirectly, such enterprise through a pattern of racketeering activity in violation of **O.C.G.A. § 16-14-4(b)** as more particularly described below and incorporated by reference as if fully set forth herein; contrary to the laws of the State of Georgia, the good order, peace, and dignity thereof;

PART I

THE ENTERPRISE

a. Introduction

The purpose of Defend the Atlanta Forest is to occupy of parts or all of 381 forested acres in DeKalb County, Georgia that is owned by Atlanta Police Foundation and leased by the City of Atlanta for the purpose of preventing the construction of the Atlanta Public Safety Training Center. Each individual charged in this indictment knowing joined the conspiracy in an attempt to prevent the training center from being built. That conspiracy contained a common purpose to commit two or more acts of racketeering activity in Fulton County, Georgia, elsewhere in the State of Georgia, and in other states.

- (141) On or about January 18, 2023, **MATTHEW MACAR** did attempt occupy the DeKalb forest with camouflage, camping gear, and living supplies. This was done to prevent the construction of the Atlanta Public Safety Training Center. This was an overt act in furtherance of the conspiracy.
- (142) On or about January 18, 2023, **SARAH WASALEWSKI** did attempt occupy the DeKalb forest with camouflage, camping gear, and living supplies. This was done to prevent the construction of the Atlanta Public Safety Training Center. This was an overt act in furtherance of the conspiracy.
- (143) On or about January 18, 2023, **SPENCER LIBERTO** did attempt occupy the DeKalb forest with camouflage, camping gear, and living supplies. This was done to prevent the construction of the Atlanta Public Safety Training Center. This was an overt act in furtherance of the conspiracy.
- (144) On or about January 18, 2023, **TIMOTHY MURPHY** did occupy a tree house in the DeKalb Woods in an effort to occupy the DeKalb forest and prevent the construction of the Atlanta Public Safety Training Center. This was an overt act in furtherance of the conspiracy.
- (145) On or about January 18, 2023, **TERESA SHEN** did attempt to occupy the DeKalb forest and prevent the construction of the Atlanta Public Safety Training Center. This was an overt act in furtherance of the conspiracy.
- (146) On or about January 18, 2023, **TERESA SHEN** did possess phone chargers, food, camouflage clothing, climber's belt, and medication. These items were to facilitate long term occupation of the DeKalb forest and prevent the construction of the Atlanta. This was an overt act in furtherance of the conspiracy.

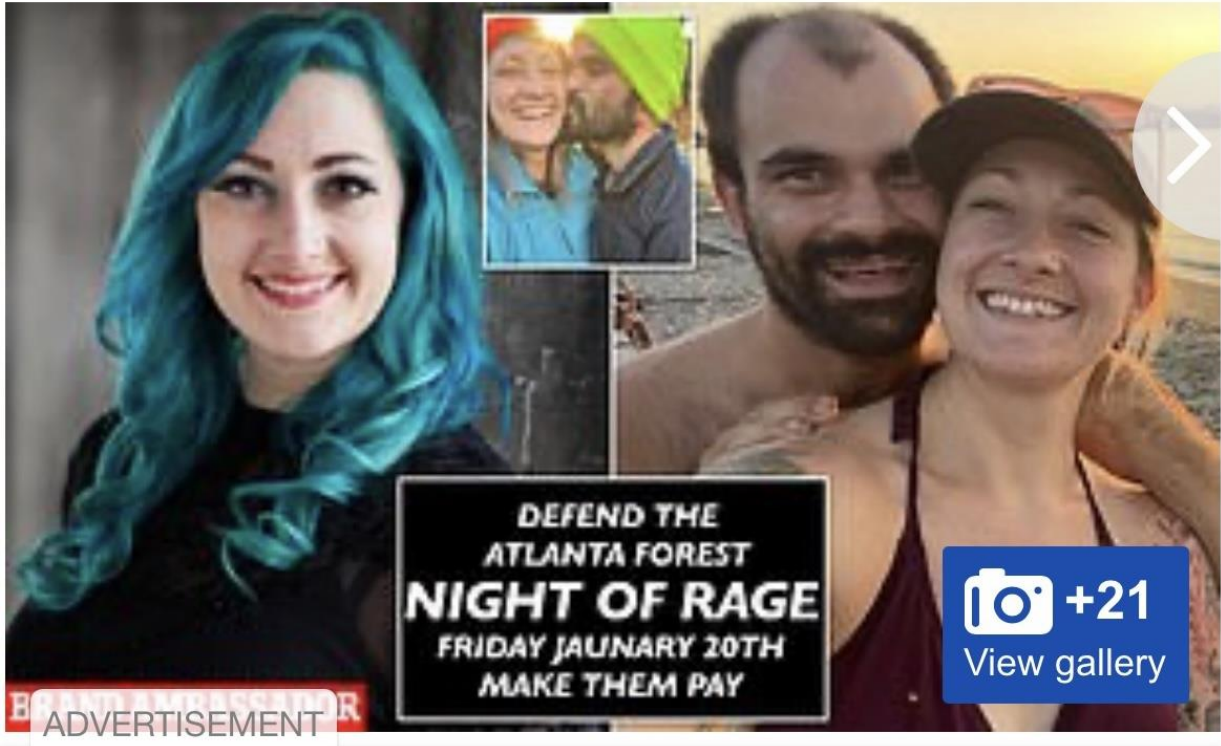
Exhibit G



Antifa 'terrorist', 35, arrested over anti-cop 'night of rage' is 'brand ambassador' who worked for Les Mills: Is also dating fellow woke goon linked to raid which saw Georgia State Trooper shot

By Emma James For Dailymail.Com

15:41 EST 21 Jan 2023 , updated 17:14 EST 21 Jan 2023





What is "Night of Wrath"? Antifa thug Sarah Wasilewski arrested as Atlanta burns in anti-cop violence

 Rory Murphy · January 22, 2023





Maine Association of Police

Yesterday at 12:36 PM · 🌐



An Antifa terrorist who was arrested during a raid that left a protester dead and a Georgia State Trooper 'seriously injured' is a 'brand ambassador' who worked for fitness guru Les Mills.

Sarah Wasilewski, 35, was one of seven activists arrested at the future \$90million Atlanta Public Safety Training Center in a 'clearing operation' on Wednesday.

Self-confessed 'brand ambassador' Wasilewski appears to have travelled from Pittsburgh, Pennsylvania, with her boyfriend and fellow extremist Spencer Liberto, 29.

Liberto and another native Pennsylvanian Matt Macar, 30, along with Geoffrey Parson, 20, of Baltimore, Timothy Murphy, 25, of Maine, Christopher Reynolds, 31, of Ohio and Terese Yue Shen, 31, of New York were all arrested on domestic terrorism charges.



MSN.COM

Antifa terrorist who urged 'retaliation' against cops is 'brand ambassador' who worked for Les Mills

👍 4

4 comments



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