

25-5702

NO. _____

ORIGINAL

Supreme Court, U.S.
FILED

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OFFICE OF THE CLERK

**IN THE
SUPREME COURT OF THE UNITED STATES**

JUSTIN SULZNER (PETITIONER)

vs.

ODNI et al (RESPONDENTS)

**ON A PETITION FOR
WRITS OF MANDAMUS
TO:**

EIGHTH CIRCUIT COURT OF APPEALS : 25-1855

JUSTIN SULZNER (NAME)

3315 WILLIAMS BLVD - SUITE 2-242 (ADDRESS)

CEDAR RAPIDS, IOWA 52404 (CITY, STATE, ZIP)

319-531-8911 OR 319-531-8782 (TELEPHONE)

QUESTIONS PRESENTED

1. Whether the 8th Circuit Appellate Court and the Iowa Northern District Court should have granted emergency injunctive reliefs and monetary damages against an ODNI covert intelligence community operating inside the CCJW, when **NARA FOIA proof is available that past ODNI covert operations were conducted for multiple decades within CCJW. (Christian Congregation of Jehovah's Witnesses)**

JUSTIFICATION FOR THE WRIT - RULE 20.2

1. The writ is necessary because the lower courts have failed to intervene in spite of overwhelming evidence that an ODNI operation existed and currently exists within the CCJW. The purpose of the writ is to strengthen the Supreme Courts' jurisdictional authority by ordering the writ and correcting an error of inaction on the part of the 8th Circuit Court of Appeals. No other remedy is available. Ordering this extraordinary writ will enhance and strengthen the current laws guaranteeing the freedom and practice of religious rights for every citizen of the United States without being worried about caustic Federal government intelligence communities influence while freely worshipping. Ordering monetary damages will deter future ODNI operations from resuming.

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1. Religious Freedom Restoration Act (RFRA) - 42 U.S.C. § 2000bb - 4

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2. In re First S. Sav. Ass'n, 820 F.2d 700, 707 (1987)
3. Haines vs. Kerner 404 U.S. 519 (1972)
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1. 28 U.S.C. § 1254(1)
2. 28 U.S.C. § 1361
3. 28 U.S.C. § 1651(a)(b)
4. 28 U.S.C. § 1915(d)(e)

MISCELLANEOUS AUTHORITY

1. 1 Timothy 3:1-5 (Bible)

LIST OF PARTIES

All ODNI Principal and Deputy Directors & ODNI Legal Department leading its 14 heads and offices and all ODNI directed operatives within each CCJW worldwide.

CASE OPINIONS

The order of the 8th Circuit Court of Appeal (**25-1855**) was denied on May 5th, 2025. The order of the Iowa Northern District Court (**C21- 0163 - LTS**) was denied on March 7th, 2025.

JURISDICTION

This petition is for the writs of mandamus and award of monetary damages. Jurisdiction is invoked under 28 U.S.C. 1254(1), 28 USC § 2106, & requested writs under 28 U.S.C. 1651(a)(b) & 28 U.S.C. 1361.

CONSTITUTIONAL & STATUTORY PROVISIONS

1. **1st & 14th Amendments** - "Petition the Government for a redress of grievances for practices restricting individual religious practice." "ODNI covert operation resulted in a violation of "separation of church and state"
2. **Free Exercise Clause** - " Prohibits ODNI interference with religious belief and, within limits, religious practice

3. **Religious Freedom Restoration Act (RFRA) - 42 U.S.C. § 2000bb - 4** " ODNI has intentionally burdened Plaintiffs' religious exercise with an internal intelligence operation and must now show that the burden is (1) in furtherance of a compelling governmental interest and (2) the least restrictive means of furthering that interest."

STATEMENT OF THE CASE

1. **Nietzke vs. Williams (1989)** held: "A complaint filed *in forma pauperis* is not automatically frivolous within the meaning of § 1915(e) because it fails to state a claim...and should not be dismissed". Iowa N. District Court improperly cited Fed Civ. R. 8(a) (2) pp. 8 "failure to state relief" as a reason for dismissal. Relief is clearly requested under "Request for relief" at the end of Plaintiff's filed complaint. (\$2.075 billion dollars in compensation and MOST IMPORTANTLY orders that would uncover the sinister operations guided by ODNI agents operating within CCJW.
2. Plaintiff clearly stated "relief" in complaint seeking emergency court injunctions identifying and forcing all ODNI to leave CCJW and monetary relief compensating the Plaintiff for the ODNI invasion within the CCJW. This is the only "adequate means of relief" and the "only appropriate remedy" under the circumstances.

Mandamus is appropriate where Plaintiff "lacks adequate alternative means to obtain the relief they seek"- **Mallard vs. Iowa S. District Court, 490 U.S. 296 (1989)**. ODNI refuses to answer any further FOIA's concerning details surrounding any intelligence operation within CCJW. The Judge would not move forward with the Plaintiffs claim that there are still are impostors within the CCJW knowing it is easier to dispense with this legal case by using inflammatory statements like "conclusory in nature", "conclusory statements" "conclusory statement without citation of facts" "conclusory allegations" "speculation, conjecture and conclusions without foundation"

Rather than order innocuous writs of mandamus requested to truly discover the facts behind this ODNI ongoing operation, Judge Leonard T. Strand has ignored the hard NARA facts presented on past ODNI covert operations, and is seeking to keep current ODNI operations from exposure.

FACTS OF THE CASE

Pro Se, age 56, mentally disabled, fourth time Federal filer, have attended the Christian Congregation of Jehovah's Witnesses (CCJW) all my life. Around 2009, Mr. Sulzner began to take note of many "suspect members" being appointed to positions of high responsibility within various congregations he had attended in eastern Iowa. It was a cause for alarm, as these individuals had no business leading congregations. In 2019, Mr. Sulzner began to suspect many ODNI operatives were residing near and attending the CCJW.

In 2019, at the local ACLU office, he filed a complaint alleging these "impostors" were part of a large ODNI intelligence community within CCJW. The ACLU said : Seek more proof of the government's intrusion !

In the next four months, 18 FOIA's were filed for more information on ODNI communities within the CCJW.

National Archives (NARA) responded to the FOIA and confirmed TWO covert ODNI intelligence operations with 13,600 pages of unredacted information, within CCJW from 1921 to 1977. Strong merits for a court case now existed. - ("we look first to the likelihood of merit of the underlying dispute.") - **Parham vs. Johnson, 126 F.3d 454, 457 (3rd Circuit) (1997)** ("Plaintiff's must have some merit in fact & law")

In May, 2021, a state of Iowa complaint was filed against ODNI. It was moved to the Iowa N. District Federal Court by the Assistant Attorney. Plaintiff alleges ODNI operatives were still inside the CCJW and requested 6 injunctive reliefs after discovering 2 active intelligence operations directed by ODNI within CCJW over 56 years. Mr. Sulzner twice requested attorney assistance from the Court and notified both Courts early concerning his mental disability.

This religious freedom issue "is one committed to the discretion of the trial court, a clear and indisputable right to the issuance of the writ of mandamus will arise only if the district court has clearly abused its discretion, such that it amounts to a judicial usurpation of power." - **In re First S. Sav. Ass'n, 820 F.2d 700, 707 (1987).**

Both Federal Courts have unquestionably ignored their duty to expose this plot and order removal of ODNI.

When NARA released the FOIA information, it was a surreal feeling knowing only ODNI, NARA and Mr. Sulzner knew of the existence of this multi-decades long top secret covert intelligence operation. In previous cases brought before the U.S. Supreme Court (20-7660), (21-6172), (21-7881). The lower courts didn't care and said it was just a "conspiracy theory." and used this as one reason for dismissal. An appeal was filed each time with the 8th Circuit Court of Appeals. They didn't care either and affirmed the Iowa N. District ruling. More information is yet to be discovered, and it will unquestionably affect other innocent bystanders. The NARA information is indisputable. These ODNI impostors also hold normal jobs within our communities, affecting others who they contact that are unaware of their real role.

Both Federal Courts act as if discovered NARA FOIA information is of no consequence to Mr. Sulzners' filed complaint ! It is solid proof that the lower courts have truly "refused to perform their true adjudicator role & duty." and do not care about the facts of the case - **La Buy vs. Howes Leather Co., 352 U.S. 249, 256-258, (1957)**

Further FOIA information demands were stalled by ODNI stating: "scope request is not applicable" or "we can neither confirm nor deny any of your questions."

Mr. Sulzner's complaint is simple....ODNI did not tell their trained, embedded intelligence operatives to just "go home" after the 1977 investigation for treason had ended (without results). ODNI had invested billions of

dollars in time and training this “invisible” intelligence army. They would stay within the CCJW, weaken the congregation from within, and patiently execute adverse decisions. Eventually the Kingdom Hall (place of worship) would be sold and the door - to - door preaching work would cease. The circumstances surrounding these two intelligence operations are quite perplexing.....for **57 years** ODNI felt there was enough “evidence” to justify a functioning treason investigation and that operation was CONTINUALLY APPROVED decade after decade....yet there were never ANY federal charges filed against Jehovah’s Witnesses for treason.

If an ODNI covert operation were found looking for “treasonous judges” inside the Iowa N. District and 8th Cir. Appellate Court for over 57 years, I’m 100% confident it would not be labeled as a “conspiracy theory!” Every judge would be appalled and demand more details on the operation!...**Why are judges not appalled in THIS situation ? Why aren't there more court ordered demands from ODNI ?**

REASONS FOR GRANTING THE WRITS OF MANDAMUS

The writs requested were clearly explained to the Iowa N. District Court and the 8th Circuit Appellate Court. All requests fell on deaf ears.

The Supreme Court has repeatedly stated that “three conditions must be satisfied” before granting an extraordinary writ of mandamus:

First : "Petitioner seeking writ must have no other adequate means to obtain the relief sought." Both the Iowa N. District and 8th Cir. Appellate Courts have unjustly and unfairly **DENIED ALL REQUESTS**. The U.S. Supreme Court is the last available "adequate means" to rectify this important matter.

Second : Petitioner must show the right to the writ is "clear and indisputable."

- A. Observed "impostors" had no Biblical qualifications to lead others inside the CCJW. Loving concern for others was truly lacking. (1 Timothy 3:1-5)
- B. NARA FOIA confirmed **TWO** covert operations within the CCJW over **MULTIPLE** decades.
- C. No other action can be taken without the "hammer" of a court order forcing discovery in this covert operation or the injunctions ordering ODNI departure and discovery detailing the operation. ODNI refuses to reply to any further questions.
- D. ODNI has a legal duty to divulge ANY involvement in the CCJW, even if considered to be minimally invasive. They choose not to divulge anything.
- E. Discovery in this case would be completely different from discovery in an ordinary case. In any other case, a plaintiff can demand written discovery and depositions. In this case, deposing any high-ranking government officials is extremely difficult and virtually impossible.

Nor are ordinary Plaintiffs able to access to documents & communications that ODNI would claim is protected by legislative and executive privilege - See **Tummino vs. Torti, 603 F. Supp. 519 (2009)** (detailing the huge burden getting discovery from FDA and branch official executives

Third : Petitioner must establish the writ is appropriate under the present circumstances. In this case, the injunctive relief is similar to a “restraining order” - See **In re Vuitton Et Fils S.A., 606 F.2d 1, 3 (1979).**

Injunction is the only appropriate remedy to identify and “purge” all those who are not truly part of the CCJW, so the practice of individual religious worship can prosper. ODNI will simply deny any involvement today, as they would have denied involvement if they were asked for information between the years of 1921 and 1977.

The requested injunctive relief was also very “specific and narrowly drawn.” **Nelson vs. Campbell (2004), citing 18 U.S.C. 3626 (a).** The writs of mandamus sought against ODNI are requested in a manner to avoid years of unwanted burdensome legal discovery. It would eliminate fighting about qualified immunity and objections to release of information protected by ODNI executive privilege. If ordered and nothing happened, the injunctive court order would be completely innocuous, affecting no one. If applicable and valid, the effects would span centuries for individuals desiring to worship freely without secret government intervention.

Ordering monetary relief of \$2.075 billion dollars would insure caustic government interventions into the true worship of the CCJW would not quickly happen again.

CONCLUSION

Yes, I am one of those "treasonous" Jehovah's Witnesses, relentlessly known for filing 1st Amendment complaints with the U.S. Supreme Court to secure religious freedom however, I can assure the U.S. Supreme Court if one of Jehovah's Witnesses is at their front door, there is a MAJOR CONSTITUTIONAL ISSUE that needs and requires fair, impartial judicial consideration. This complaint is just that!

The petition for writs of mandamus requesting orders of injunctive relief and award of monetary damages against ODNI should be granted under these unusual circumstances. (Rule #22)

This petition complies with the Rule #14, #18, #20 and #33 - Rules of the Supreme Court and has 2480 words.

Respectfully submitted -

"I declare and certify under penalty of perjury that the foregoing fact within this Supreme Court petition are true and correct in compliance with 28 U.S.C § 1746 " :

Dated this 29th day of July, 2025

/s/ Justin Paul Sulzner

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Iowa N. District Court & 8th Cir Court of Appeals

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