

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF KANSAS

UNITED STATES OF AMERICA, )  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 ANGEL DILLARD, )  
 )  
 Defendant. )  
 )  
 \_\_\_\_\_ )

CIVIL ACTION

No. 6:11-cv-1098-JTM-KGG

**AMENDED COMPLAINT**

The United States of America (the "United States"), asserts a civil cause of action under the Freedom of Access to Clinic Entrances Act ("FACE"), 18 U.S.C. § 248 (1994), enacted into law May 26, 1994, as follows:

1. The United States has reasonable cause to believe:

(1) Defendant, Angel Dillard, has committed, and is likely to continue to commit, violations of FACE; and (2) various persons are being, have been, and will continue to be injured, intimidated and/or interfered with by Defendant's conduct.

**JURISDICTION, STANDING, AND VENUE**

2. This Court has jurisdiction over this action pursuant to FACE, 18 U.S.C. § 248(c)(2), and 28 U.S.C. § 1345.

3. The United States has standing to bring this action pursuant to FACE, 18 U.S.C. § 248(c)(2).

4. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391(b)(1) and (b)(2), in that, upon information and belief, Defendant resides in this judicial district, and all the events giving rise to this complaint occurred in this judicial district.

**DEFENDANT**

5. On information and belief, Defendant resides in Valley Center, Kansas.

**FACTUAL BACKGROUND**

6. On May 31, 2009, reproductive healthcare provider Dr. George Tiller was shot in his church and killed by anti-abortionist Scott Roeder.

7. Scott Roeder was convicted of first-degree murder and sentenced to life without parole for murdering Dr. Tiller.

8. Defendant is a well-known anti-abortion activist who became friendly with Scott Roeder after he killed Dr. Tiller, and has since visited Scott Roeder in prison, spoken to him on the phone, and exchanged letters with him.

9. Defendant has spoken publicly about her friendship with Roeder and her admiration for his conduct. Defendant has been quoted as telling the Associated Press in a July 2009 interview, “With one move, [Roeder] was able . . . to accomplish what we had not been able to do. So he followed his convictions, and I admire that.”

10. Since Dr. Tiller’s murder, no physician has openly performed abortions in Wichita, Kansas.

11. Dr. Mila Means is a family practitioner in Wichita, Kansas, who is training to provide abortion services to women in Wichita.

12. Dr. Means considers Dr. Tiller her mentor, and intends to follow in his footsteps by

performing abortions in Wichita.

13. Since Dr. Means' intention was publicized in December 2010 by groups opposed to abortion, Dr. Means and her employees have been the target of protests at their office and homes.

14. On or about January 15, 2011, Defendant mailed a letter to Dr. Means in which she made a threat of force for the purpose of intimidating Dr. Means from performing abortions in Wichita. A copy of that letter is appended to this Amended Complaint as Attachment A and is incorporated by reference herein.

15. Defendant's letter states, in part:

Thousands of people are already looking into your background, not just in Wichita, but from all over the US. They will know your habits and routines. They will know where you shop, who your friends are, what you drive, where you live. **You will be checking under your car everyday-because maybe today is the day someone places an explosive under it. [Emphasis added]**

16. Defendant's letter references Dr. Tiller by stating, "Maybe you don't realize the consequences of killing the innocent. If Tiller could speak from hell, he would tell you what a soulless existence you are purposefully considering, all in the name of greed."

17. Defendant's letter further states, "I urge you to think very carefully about the choices you are making. . . . We will not let this abomination continue without doing everything we can to stop it."

18. Defendant signed the letter "Angel Dillard" and sent the letter in an envelope with a pre-printed return address sticker with Defendant's name and address.

19. Defendant's letter intimidated Dr. Means and caused her to undertake numerous security measures, including having her car examined by a mechanic, parking her car where it is visible to her, installing door alarms, staying overnight at different locations, varying her route to

and from work, and looking for a more secure building in which to practice.

**CAUSE OF ACTION UNDER 18 U.S.C. § 248**

20. The United States incorporates herein the averments of paragraphs 1 through 19 hereof.

21. Defendant's conduct as described in paragraphs 14 through 18 hereof constitutes a threat of force in order to in intimidate a person from providing reproductive health services.

22. On information and belief, unless Defendant is restrained by this Court, Defendant will continue to engage in the illegal conduct averred herein.

23. On information and belief, unless Defendant is restrained by this Court, persons seeking to provide reproductive healthcare services will continue to be intimidated.

24. The United States is authorized under 18 U.S.C. § 248(c)(2)(B) to seek and obtain temporary, preliminary, and/or permanent injunctive relief from this Court for Defendant's violation of FACE.

25. The United States is further authorized under 18 U.S.C. § 248(c)(2)(B) to seek and obtain statutory compensatory damages on behalf of persons aggrieved by Defendant's actions in violation of FACE.

26. The United States is further authorized under 18 U.S.C. § 248(c)(2)(B)(i) to seek and obtain a civil penalty against a respondent no greater than \$15,000.00 for a first violation other than a nonviolent physical obstruction.

WHEREFORE, the United States respectfully requests judgment in its favor and against Defendant, Angel Dillard, in the form of:

- A. An Order permanently prohibiting Defendant, Angel Dillard, from contacting Dr. Mila Means via letter, email, phone call, or any other form of communication;
- B. An Order permanently prohibiting Defendant, Angel Dillard, and her representatives, agents, employees and any others acting in concert or participation with her, from violating the Freedom of Access to Clinic Entrances Act;
- C. An Order permanently prohibiting Defendant, Angel Dillard, and her representatives, agents, employees and any others acting in concert or participation with her, from coming within 250 feet of Dr. Mila Means, her residence, her car, or her place of business;
- D. Statutory compensatory damages to the victim of Defendant Angel Dillard's activities in the amount of \$5,000; and
- E. A civil penalty assessment in the amount of \$15,000.00.

Respectfully submitted,

BARRY R. GRISSOM  
United States Attorney  
District of Kansas

THOMAS E. PEREZ  
Assistant Attorney General  
Civil Rights Division

JONATHAN SMITH  
Chief  
Special Litigation Section

JULIE K. ABBATE  
Deputy Chief  
Special Litigation Section

By: Emily Metzger  
Assistant United States Attorney  
1200 Epic Center  
301 N. Main St.  
Wichita, KS 67202  
Kansas Bar No. 10750  
(316) 269-6481  
(316) 269-6484 (fax)

s/Aaron Fleisher  
AARON FLEISHER  
Trial Attorney  
United States Department of Justice  
Civil Rights Division  
Special Litigation Section  
950 Pennsylvania Ave., N.W.  
Washington, DC 20530  
(202) 514-6255  
(202) 514-6903 (fax)  
aaron.fleisher@usdoj.gov

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF KANSAS

UNITED STATES OF AMERICA,	:	CIVIL ACTION
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
ANGEL DILLARD,	:	No. 6:11-cv-1098-JTM-KGG
	:	
Defendant.	:	

**CERTIFICATE OF SERVICE**

I hereby certify that on May 10, 2011, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will provide notice of such filing to all registered parties.

s/Aaron Fleisher  
AARON FLEISHER  
Trial Attorney  
Special Litigation Section  
Civil Rights Division  
UNITED STATES Department of Justice  
950 Pennsylvania Avenue, N.W.  
Washington, D.C. 20530  
Telephone: (202) 514-6255  
Facsimile: (202) 514-6903  
aaron.fleisher@usdoj.gov

received 1/19/11  
@ 10:30am

15JAN11

**Dr. Means,**

It has come to our attention that you are planning to do abortions at your Harry St. location. I am stunned that you would take your career in this direction. Fewer people than ever before are pro-abortion, quality physicians wouldn't even consider associating themselves with it, and more Americans than ever before are unwilling to turn a blind eye to the killing of a baby when the ratio for adoption is 36 couples to 1 baby.

Maybe you don't realize the consequences of killing the innocent. If Tiller could speak from hell, he would tell you what a soulless existence you are purposefully considering, all in the name of greed. Thousands of people are already looking into your background, not just in Wichita, but from all over the U.S. They will know your habits and routines. They know where you shop, who your friends are, what you drive, where you live. You will be checking under your car everyday-because maybe today is the day someone places an explosive under it. People will be picketing your home, your office. You will come under greater scrutiny than you've ever known, legally and professionally. Much worse than the disciplinary actions and ethical concerns that you've been facing. You will become a pariah-no physician will want to associate with you. You will be seen like all the other hacks that have stooped to doing abortions when they weren't good enough to maintain a real practice. You will lose your legitimate clientele, as no one bringing a baby into this world wants to be in the same facility where you are also killing them. You will have trouble keeping staff who are willing to participate in innocent bloodshedding and won't be able to keep the sanitary conditions necessary to maintain a healthy medical facility. You will end up having the same kind of rat-infested, dirty facility that they have in north-eastern Kansas. Anyone who partners with you will experience the same headaches. Not to mention the fact that you will be haunted by bloody, squirming, dismembered babies in your sleep. You can't do what is morally reprehensible and enjoy peace of mind. The Bible says, "There are six things the Lord hates. . . hands that shed innocent blood, a heart that devises evil schemes, feet that are quick to rush into evil. . ." Proverbs 6:16-18. Abortion kills human life-it matters not if you kill it at 6 weeks or at 26 weeks, it's still the unnatural, violent death of a human baby for the sake of convenience. You are doing what the Humane Society wouldn't allow to happen to a pregnant dog or cat.

I urge you to think very carefully about the choices you are making. There are 3 churches within 1 block of your practice, and many others who must take a stand. We will not let this abomination continue without doing everything we can to stop it. We pray you will either make the right choice and use your medical practice to heal instead of kill, or that God would bring judgment on you, the likes of which you cannot imagine. We don't want you killing our children in our community. Good people are tired of this rampant evil, and will stand against you every step of the way. Do the world a favor and **ABORT** this stupid plan of yours. It's not too late to change your mind.

Angel Dillard



Mrs. Angel Dillard  
9221 B 125th St N  
Valley Center, KS 67147

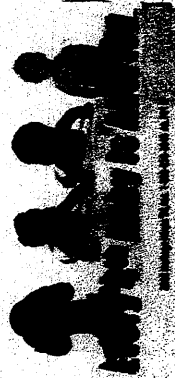
★ PROUD SUPPORTER OF THE USO ★



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Milo Means  
9916 E. Hwy  
Wichita, Ks 67027



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