

IN THE IOWA DISTRICT COURT FOR SIOUX COUNTY

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STATE OF IOWA,

NO 03841 SMSM026797

Plaintiff,

Vs.

PAUL ROBERT DORR,

MOTION FOR CHANGE OF VENUE

Defendant.

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COMES NOW PAUL ROBERT DORR, and for this MOTION FOR CHANGE OF VENUE, respectfully states:

1. When the alleged events which are the subject of the alleged crime of criminal mischief occurred, the news media in Northwest Iowa (which includes Sioux County) published numerous stories and reports of the events surrounding Dorr's alleged actions including showing and publishing a small portion of the video of his alleged actions although that video **inadmissible** at the trial of this case.

2. These alleged events were republished and the video rebroadcast following the filing of this court's ORDER dated July 8, 2019, again throughout Sioux County, this time with the quote from the court that "Mr. Dorr is being sent the message that he cannot burn books that do not belong to him."

3. This ORDER is widely being interpreted as a conviction and that the case is over because the ORDER makes no reference to the upcoming trial nor the STATE'S burden of proof beyond a reasonable doubt, the state's failure to allege **unlawful** intent (*mens rea*), and the

presumption of innocence that Dorr is guaranteed under the Constitutions of the United States and the State of Iowa.

4. These publications, combined with prior activities and reports of 1) Dorr's extensive history in the pro-life movement 2) A federal lawsuit where the U.S. District Court of Northern Iowa restored Dorr's 1<sup>st</sup> Amendment Rights of Free Speech which were being denied by his local county Sheriff 3) Dorr's nearly 30 year record of opposing multiple Judges in the Third Judicial District at the ballot box have influenced and prejudiced the jury pool in Sioux County and surrounding counties in Northwest Iowa so that the defendant cannot obtain a fair trial.

WHEREFORE, for all of the foregoing reasons, Paul Robert Dorr prays this court to enter an order finding that jury pool in Northwest Iowa would be so prejudiced that he could not obtain a fair trial and therefore this case must be moved outside the Third Judicial District of Iowa.

July 27, 2019

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Date

Paul R Dorr #

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Paul Robert Dorr, Defendant  
(Pro Se)