

VIRGINIA:

IN THE CIRCUIT COURT FOR THE CITY OF CHARLOTTESVILLE

CITY OF CHARLOTTESVILLE, *et al.*,

Plaintiffs,

v.

PENNSYLVANIA LIGHT FOOT MILITIA,
et al.,

Defendants.

Case No. 17000560-00

CONSENT MOTION FOR ENTRY OF CONSENT DECREE

The Plaintiffs in this matter and Defendants Pennsylvania Light Foot Militia and Christian Yingling have resolved the issues in controversy between them and have agreed to the terms of the Consent Decree submitted with this Motion. Plaintiffs respectfully request that the Court enter the attached Consent Decree as a full and final resolution of Plaintiffs' claims against Defendants Pennsylvania Light Foot Militia and Christian Yingling.

Defendants Pennsylvania Light Foot Militia and Christian Yingling consent to the filing of this Motion.

May 16, 2018



R. LEE LIVINGSTON (VSB #35747)
KYLE McNEW (VSB #73210)
MichieHamlett PLLC
500 Court Square, Suite 300
Charlottesville, VA 22902

Respectfully submitted,

MARY B. MCCORD*
JOSHUA A. GELTZER*
DOUGLAS N. LETTER*
AMY L. MARSHAK*
ROBERT D. FRIEDMAN*

Tel: (434) 951-7200

DANIEL B. RICE*
Institute for Constitutional Advocacy and Protection
Georgetown University Law Center
600 New Jersey Ave. NW
Washington, DC 20001
Tel: (202) 662-9042

Counsel for Plaintiffs

LISA ROBERTSON (VSB #32486)
Acting City Attorney
P.O. Box 911
605 East Main Street
Charlottesville, VA 22902
Tel: (434) 970-3131

Counsel for the City of Charlottesville

*Admitted pro hac vice.

CERTIFICATE OF SERVICE

I hereby certify that true and accurate copies of the foregoing Consent Motion for Entry of Consent Decree and proposed Consent Decree were sent via electronic mail on May 16, 2018, to the following:

Elmer Woodard
isuecrooks@comcast.net
Counsel for Defendants Jason Kessler, Elliott Kline, Matthew Heimbach, Traditionalist Worker Party, and Vanguard America

James Kolenich
jek318@gmail.com
Counsel for Defendants Jason Kessler, Elliott Kline, Matthew Heimbach, Traditionalist Worker Party, and Vanguard America

Pam Starsia
pamstarsia@starsialaw.com
Counsel for Defendant Redneck Revolt

Jeff Fogel
jeff.fogel@gmail.com
Counsel for Defendant Redneck Revolt



R. LEE LIVINGSTON (VSB #35747)
KYLE McNEW (VSB #73210)
MichieHamlett PLLC
500 Court Square, Suite 300
Charlottesville, VA 22902
Tel: (434) 951-7200

MARY B. MCCORD*
JOSHUA A. GELTZER*
DOUGLAS N. LETTER*
AMY L. MARSHAK*
ROBERT D. FRIEDMAN*
DANIEL B. RICE*
Institute for Constitutional Advocacy and Protection
Georgetown University Law Center
600 New Jersey Ave. NW
Washington, DC 20001
Tel: (202) 662-9042

Counsel for Plaintiffs

LISA ROBERTSON (VSB #32486)
Acting City Attorney
P.O. Box 911
605 East Main Street

Charlottesville, VA 22902
Tel: (434) 970-3131

Counsel for the City of Charlottesville

*Admitted *pro hac vice*.

VIRGINIA:

IN THE CIRCUIT COURT FOR THE CITY OF CHARLOTTESVILLE

CITY OF CHARLOTTESVILLE, *et al.*,

Plaintiffs,

v.

PENNSYLVANIA LIGHT FOOT MILITIA,
et al.,

Defendants.

Case No. 17000560-00

CONSENT DECREE

The Plaintiffs in this matter and Defendants Christian Yingling and Pennsylvania Light Foot Militia have resolved the issues in controversy between them and have agreed to the terms of this Consent Decree, as follows:

I. STIPULATED RECITALS

1. This Consent Decree constitutes the entire agreement between Plaintiffs and Defendants Christian Yingling and Pennsylvania Light Foot Militia.
2. This Consent Decree does not constitute evidence or admission of any issues of fact or law and is not an admission of civil or criminal liability.
3. Each party has entered into this Consent Decree voluntarily.

II. ORDER

1. Defendants (1) Christian Yingling and (2) Pennsylvania Light Foot Militia and its directors, officers, members, agents, and successors are hereby permanently enjoined from returning to Charlottesville, Virginia, as part of a unit of two or more persons acting in concert

while armed with a firearm, weapon, shield, or any item whose purpose is to inflict bodily harm, at any demonstration, rally, protest, or march.

2. A violation of this Consent Decree shall be punishable by contempt and may subject the entity or person in violation to all penalties or sanctions allowed by law.

3. This Consent Decree may be modified only by order of this Court.

4. The failure of any party to exercise any right under this Consent Decree shall not be deemed a waiver of any right or any future rights.

5. If any part of this Consent Decree shall for any reason be found or held invalid or unenforceable by any court of competent jurisdiction, such invalidity or unenforceability shall not affect the remainder of this Consent Decree, which shall survive and be construed as if such invalid or unenforceable part had not been contained herein.

6. This Consent Decree conclusively resolves and is final with respect to all claims arising out of the events of August 12, 2017, between the parties.

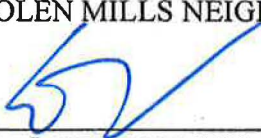
ENTERED: / /

Judge, Circuit Court for the City of Charlottesville

WE ASK FOR THIS:

CITY OF CHARLOTTESVILLE
DOWNTOWN BUSINESS ASSOCIATION OF CHARLOTTESVILLE
CHAMPION BREWING COMPANY, LLC
ESCAFÉ
IRON PAFFLES AND COFFEE
MAS TAPAS

MAYA RESTAURANT
QUALITY PIE
RAPTURE RESTAURANT AND NIGHT CLUB
ALAKAZAM TOYS AND GIFTS
ALIGHT FUND LLC
ANGELO JEWELRY
HAYS + EWING DESIGN STUDIO, PC
WOLF ACKERMAN DESIGN, LLC
WILLIAMS PENTAGRAM CORPORATION
BELMONT-CARLTON NEIGHBORHOOD ASSOCIATION
LITTLE HIGH NEIGHBORHOOD ASSOCIATION
WOOLEN MILLS NEIGHBORHOOD ASSOCIATION

By: 
R. LEE LIVINGSTON (VSB #35747)
KYLE McNEW (VSB #73210)
MichieHamlett PLLC
500 Court Square, Suite 300
Charlottesville, VA 22902
Tel: (434) 951-7200

MARY B. MCCORD*
JOSHUA A. GELTZER*
DOUGLAS N. LETTER*
AMY L. MARSHAK*
ROBERT D. FRIEDMAN*
DANIEL B. RICE*
Institute for Constitutional Advocacy and Protection
Georgetown University Law Center
600 New Jersey Ave. NW
Washington, DC 20001
Tel: (202) 662-9042

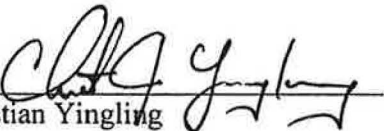
Counsel for Plaintiffs

LISA ROBERTSON (VSB #32486)
Acting City Attorney
P.O. Box 911
605 East Main Street
Charlottesville, VA 22902
Tel: (434) 970-3131

Counsel for the City of Charlottesville

*Admitted *pro hac vice*.

Christian Yingling
Pennsylvania Light Foot Militia

By: 
Christian Yingling
Commanding Officer
Pennsylvania Light Foot Militia
129th Battalion Lauren Highlands Ghost Company
610 Longview Ct.
New Derry, PA 15671

Pro se

VIRGINIA:

IN THE CIRCUIT COURT FOR THE CITY OF CHARLOTTESVILLE

CITY OF CHARLOTTESVILLE, *et al.*,

Plaintiffs,

v.

PENNSYLVANIA LIGHT FOOT MILITIA,
et al.,

Defendants.

Case No. 17000560-00

CONSENT MOTION FOR ENTRY OF CONSENT DECREE

The Plaintiffs in this matter and Defendants New York Light Foot Militia and George Curbelo have resolved the issues in controversy between them and have agreed to the terms of the Consent Decree submitted with this Motion. Plaintiffs respectfully request that the Court enter the attached Consent Decree as a full and final resolution of Plaintiffs' claims against Defendants New York Light Foot Militia and George Curbelo.

Defendants New York Light Foot Militia and George Curbelo consent to the filing of this Motion.

May 16, 2018



R. LEE LIVINGSTON (VSB #35747)
KYLE McNEW (VSB #73210)
MichieHamlett PLLC
500 Court Square, Suite 300
Charlottesville, VA 22902

Respectfully submitted,

MARY B. MCCORD*
JOSHUA A. GELTZER*
DOUGLAS N. LETTER*
AMY L. MARSHAK*
ROBERT D. FRIEDMAN*

Tel: (434) 951-7200

DANIEL B. RICE*
Institute for Constitutional Advocacy and Protection
Georgetown University Law Center
600 New Jersey Ave. NW
Washington, DC 20001
Tel: (202) 662-9042

Counsel for Plaintiffs

LISA ROBERTSON (VSB #32486)
Acting City Attorney
P.O. Box 911
605 East Main Street
Charlottesville, VA 22902
Tel: (434) 970-3131

Counsel for the City of Charlottesville

*Admitted pro hac vice.

CERTIFICATE OF SERVICE

I hereby certify that true and accurate copies of the foregoing Consent Motion for Entry of Consent Decree and proposed Consent Decree were sent via electronic mail on May 16, 2018, to the following:

Elmer Woodard
isuecrooks@comcast.net
Counsel for Defendants Jason Kessler, Elliott Kline, Matthew Heimbach, Traditionalist Worker Party, and Vanguard America

James Kolenich
jek318@gmail.com
Counsel for Defendants Jason Kessler, Elliott Kline, Matthew Heimbach, Traditionalist Worker Party, and Vanguard America

Pam Starsia
pamstarsia@starsialaw.com
Counsel for Defendant Redneck Revolt

Jeff Fogel
jeff.fogel@gmail.com
Counsel for Defendant Redneck Revolt



R. LEE LIVINGSTON (VSB #35747)
KYLE MCNEW (VSB #73210)
MichieHamlett PLLC
500 Court Square, Suite 300
Charlottesville, VA 22902
Tel: (434) 951-7200

MARY B. MCCORD*
JOSHUA A. GELTZER*
DOUGLAS N. LETTER*
AMY L. MARSHAK*
ROBERT D. FRIEDMAN*
DANIEL B. RICE*
Institute for Constitutional Advocacy and Protection
Georgetown University Law Center
600 New Jersey Ave. NW
Washington, DC 20001
Tel: (202) 662-9042

Counsel for Plaintiffs

LISA ROBERTSON (VSB #32486)
Acting City Attorney
P.O. Box 911
605 East Main Street

Charlottesville, VA 22902
Tel: (434) 970-3131

Counsel for the City of Charlottesville

*Admitted *pro hac vice*.

VIRGINIA:

IN THE CIRCUIT COURT FOR THE CITY OF CHARLOTTESVILLE

CITY OF CHARLOTTESVILLE, *et al.*,

Plaintiffs,

v.

PENNSYLVANIA LIGHT FOOT MILITIA,
et al.,

Defendants.

Case No. 17000560-00

CONSENT DECREE

The Plaintiffs in this matter and Defendants George Curbelo and New York Light Foot Militia have resolved the issues in controversy between them and have agreed to the terms of this Consent Decree, as follows:

I. STIPULATED RECITALS

1. This Consent Decree constitutes the entire agreement between Plaintiffs and Defendants George Curbelo and New York Light Foot Militia.
2. This Consent Decree does not constitute evidence or admission of any issues of fact or law and is not an admission of civil or criminal liability.
3. Each party has entered into this Consent Decree voluntarily.

II. ORDER

1. Defendants (1) George Curbelo and (2) New York Light Foot Militia and its directors, officers, members, agents, and successors are hereby permanently enjoined from returning to Charlottesville, Virginia, as part of a unit of two or more persons acting in concert

while armed with a firearm, weapon, shield, or any item whose purpose is to inflict bodily harm, at any demonstration, rally, protest, or march.

2. A violation of this Consent Decree shall be punishable by contempt and may subject the entity or person in violation to all penalties or sanctions allowed by law.

3. This Consent Decree may be modified only by order of this Court.

4. The failure of any party to exercise any right under this Consent Decree shall not be deemed a waiver of any right or any future rights.

5. If any part of this Consent Decree shall for any reason be found or held invalid or unenforceable by any court of competent jurisdiction, such invalidity or unenforceability shall not affect the remainder of this Consent Decree, which shall survive and be construed as if such invalid or unenforceable part had not been contained herein.

6. This Consent Decree conclusively resolves and is final with respect to all claims arising out of the events of August 12, 2017, between the parties.

ENTERED: / /

Judge, Circuit Court for the City of Charlottesville

WE ASK FOR THIS:

CITY OF CHARLOTTESVILLE
DOWNTOWN BUSINESS ASSOCIATION OF CHARLOTTESVILLE
CHAMPION BREWING COMPANY, LLC
ESCAFÉ
IRON PAFFLES AND COFFEE
MAS TAPAS

MAYA RESTAURANT
QUALITY PIE
RAPTURE RESTAURANT AND NIGHT CLUB
ALAKAZAM TOYS AND GIFTS
ALIGHT FUND LLC
ANGELO JEWELRY
HAYS + EWING DESIGN STUDIO, PC
WOLF ACKERMAN DESIGN, LLC
WILLIAMS PENTAGRAM CORPORATION
BELMONT-CARLTON NEIGHBORHOOD ASSOCIATION
LITTLE HIGH NEIGHBORHOOD ASSOCIATION
WOOLEN MILLS NEIGHBORHOOD ASSOCIATION

By: 

R. LEE LIVINGSTON (VSB #35747)
KYLE McNEW (VSB #73210)
MichieHamlett PLLC
500 Court Square, Suite 300
Charlottesville, VA 22902
Tel: (434) 951-7200

MARY B. MCCORD*
JOSHUA A. GELTZER*
DOUGLAS N. LETTER*
AMY L. MARSHAK*
ROBERT D. FRIEDMAN*
DANIEL B. RICE*
Institute for Constitutional Advocacy and Protection
Georgetown University Law Center
600 New Jersey Ave. NW
Washington, DC 20001
Tel: (202) 662-9042

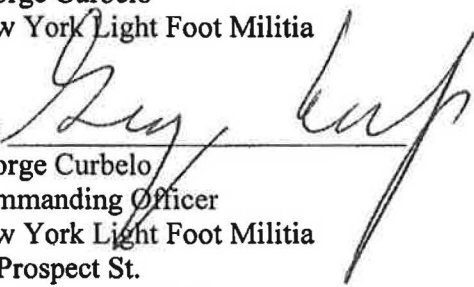
Counsel for Plaintiffs

LISA ROBERTSON (VSB #32486)
Acting City Attorney
P.O. Box 911
605 East Main Street
Charlottesville, VA 22902
Tel: (434) 970-3131

Counsel for the City of Charlottesville

*Admitted *pro hac vice*.

George Curbelo
New York Light Foot Militia

By: 
George Curbelo
Commanding Officer
New York Light Foot Militia
21 Prospect St.
Stamford, NY 12167

Pro se

VIRGINIA:

IN THE CIRCUIT COURT FOR THE CITY OF CHARLOTTESVILLE

CITY OF CHARLOTTESVILLE, *et al.*,

Plaintiffs,

v.

PENNSYLVANIA LIGHT FOOT MILITIA,
et al.,

Defendants.

Case No. 17000560-00

CONSENT MOTION FOR ENTRY OF CONSENT DECREE

The Plaintiffs in this matter and Defendants III% People's Militia of Maryland and Gary Sigler have resolved the issues in controversy between them and have agreed to the terms of the Consent Decree submitted with this Motion. Plaintiffs respectfully request that the Court enter the attached Consent Decree as a full and final resolution of Plaintiffs' claims against Defendants III% People's Militia of Maryland and Gary Sigler.

Defendants III% People's Militia of Maryland and Gary Sigler consent to the filing of this Motion.

May 16, 2018



R. LEE LIVINGSTON (VSB #35747)
KYLE McNEW (VSB #73210)
MichieHamlett PLLC
500 Court Square, Suite 300
Charlottesville, VA 22902

Respectfully submitted,

MARY B. McCORD*
JOSHUA A. GELTZER*
DOUGLAS N. LETTER*
AMY L. MARSHAK*
ROBERT D. FRIEDMAN*

Tel: (434) 951-7200

DANIEL B. RICE*
Institute for Constitutional Advocacy and Protection
Georgetown University Law Center
600 New Jersey Ave. NW
Washington, DC 20001
Tel: (202) 662-9042

Counsel for Plaintiffs

LISA ROBERTSON (VSB #32486)
Acting City Attorney
P.O. Box 911
605 East Main Street
Charlottesville, VA 22902
Tel: (434) 970-3131

Counsel for the City of Charlottesville

*Admitted pro hac vice.

CERTIFICATE OF SERVICE

I hereby certify that true and accurate copies of the foregoing Consent Motion for Entry of Consent Decree and proposed Consent Decree were sent via electronic mail on May 16, 2018, to the following:

Elmer Woodard
isuecrooks@comcast.net
Counsel for Defendants Jason Kessler, Elliott Kline, Matthew Heimbach, Traditionalist Worker Party, and Vanguard America

James Kolenich
jek318@gmail.com
Counsel for Defendants Jason Kessler, Elliott Kline, Matthew Heimbach, Traditionalist Worker Party, and Vanguard America

Pam Starsia
pamstarsia@starsialaw.com
Counsel for Defendant Redneck Revolt

Jeff Fogel
jeff.fogel@gmail.com
Counsel for Defendant Redneck Revolt



R. LEE LIVINGSTON (VSB #35747)
KYLE MCNEW (VSB #73210)
MichieHamlett PLLC
500 Court Square, Suite 300
Charlottesville, VA 22902
Tel: (434) 951-7200

MARY B. MCCORD*
JOSHUA A. GELTZER*
DOUGLAS N. LETTER*
AMY L. MARSHAK*
ROBERT D. FRIEDMAN*
DANIEL B. RICE*
Institute for Constitutional Advocacy and Protection
Georgetown University Law Center
600 New Jersey Ave. NW
Washington, DC 20001
Tel: (202) 662-9042

Counsel for Plaintiffs

LISA ROBERTSON (VSB #32486)
Acting City Attorney
P.O. Box 911
605 East Main Street

Charlottesville, VA 22902
Tel: (434) 970-3131

Counsel for the City of Charlottesville

*Admitted *pro hac vice*.

VIRGINIA:

IN THE CIRCUIT COURT FOR THE CITY OF CHARLOTTESVILLE

CITY OF CHARLOTTESVILLE, *et al.*,

Plaintiffs,

v.

PENNSYLVANIA LIGHT FOOT MILITIA,
et al.,

Defendants.

Case No. 17000560-00

CONSENT DECREE

The Plaintiffs in this matter and Defendants Gary Sigler and III% People's Militia of Maryland have resolved the issues in controversy between them and have agreed to the terms of this Consent Decree, as follows:

I. STIPULATED RECITALS

1. This Consent Decree constitutes the entire agreement between Plaintiffs and Defendants Gary Sigler and III% People's Militia of Maryland.
2. This Consent Decree does not constitute evidence or admission of any issues of fact or law and is not an admission of civil or criminal liability.
3. Each party has entered into this Consent Decree voluntarily.

II. ORDER

1. Defendants (1) Gary Sigler and (2) III% People's Militia of Maryland and its directors, officers, members, agents, and successors are hereby permanently enjoined from returning to Charlottesville, Virginia, as part of a unit of two or more persons acting in concert

while armed with a firearm, weapon, shield, or any item whose purpose is to inflict bodily harm, at any demonstration, rally, protest, or march.

2. A violation of this Consent Decree shall be punishable by contempt and may subject the entity or person in violation to all penalties or sanctions allowed by law.

3. This Consent Decree may be modified only by order of this Court.

4. The failure of any party to exercise any right under this Consent Decree shall not be deemed a waiver of any right or any future rights.

5. If any part of this Consent Decree shall for any reason be found or held invalid or unenforceable by any court of competent jurisdiction, such invalidity or unenforceability shall not affect the remainder of this Consent Decree, which shall survive and be construed as if such invalid or unenforceable part had not been contained herein.

6. This Consent Decree conclusively resolves and is final with respect to all claims arising out of the events of August 12, 2017, between the parties.


ENTERED: / /

Judge, Circuit Court for the City of Charlottesville

WE ASK FOR THIS:

CITY OF CHARLOTTESVILLE
DOWNTOWN BUSINESS ASSOCIATION OF CHARLOTTESVILLE
CHAMPION BREWING COMPANY, LLC
ESCAFÉ
IRON PAFFLES AND COFFEE
MAS TAPAS

MAYA RESTAURANT
QUALITY PIE
RAPTURE RESTAURANT AND NIGHT CLUB
ALAKAZAM TOYS AND GIFTS
ALIGHT FUND LLC
ANGELO JEWELRY
HAYS + EWING DESIGN STUDIO, PC
WOLF ACKERMAN DESIGN, LLC
WILLIAMS PENTAGRAM CORPORATION
BELMONT-CARLTON NEIGHBORHOOD ASSOCIATION
LITTLE HIGH NEIGHBORHOOD ASSOCIATION
WOOLEN MILLS NEIGHBORHOOD ASSOCIATION

By: 
R. LEE LIVINGSTON (VSB #35747)
KYLE McNEW (VSB #73210)
MichieHamlett PLLC
500 Court Square, Suite 300
Charlottesville, VA 22902
Tel: (434) 951-7200

MARY B. MCCORD*
JOSHUA A. GELTZER*
DOUGLAS N. LETTER*
AMY L. MARSHAK*
ROBERT D. FRIEDMAN*
DANIEL B. RICE*
Institute for Constitutional Advocacy and Protection
Georgetown University Law Center
600 New Jersey Ave. NW
Washington, DC 20001
Tel: (202) 662-9042

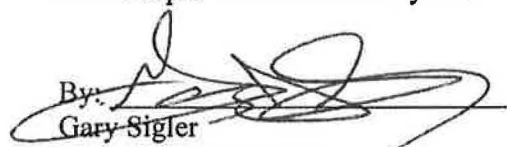
Counsel for Plaintiffs

LISA ROBERTSON (VSB #32486)
Acting City Attorney
P.O. Box 911
605 East Main Street
Charlottesville, VA 22902
Tel: (434) 970-3131

Counsel for the City of Charlottesville

*Admitted *pro hac vice*.

Gary Sigler
III% People's Militia of Maryland

By: 
Gary Sigler

Commanding Officer
III% People's Militia of Maryland
5100 Geeting Rd.
Westminster, MD 21158

Pro se