### 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 National Socialist Movement and Jeff
Schoep have resolved the issues in controversy between them and have agreed to the terms of
this Consent Decree, as follows:

# I. STIPULATED RECITALS

- This Consent Decree constitutes the entire agreement between Plaintiffs and Defendants National Socialist Movement and Jeff Schoep.
- 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) National Socialist Movement and its directors, officers, members, agents, and successors and (2) Jeff Schoep 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 by 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: 4/11/18

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

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