

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 Defendant Jason Kessler 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 Defendant Jason Kessler.
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. Defendant Jason Kessler is hereby permanently enjoined from:
  - a. returning or soliciting other individuals or groups to return 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;

- b. instructing or facilitating the instruction of individuals or groups in the use of any weapon or technique capable of causing injury or death, knowing or intending that the weapon or technique will be used at any demonstration, rally, protest, or march, in Charlottesville, Virginia; and
- c. issuing any commands, instructions, or directives to any group of two or more persons armed with a firearm, weapon, shield, or any item whose purpose is to inflict bodily harm, which commands, instructions, or directives are related to the use of such weapons or any techniques capable of causing injury or death, at any demonstration, rally, protest, or march, in Charlottesville, Virginia.

2. With respect to any future demonstration, rally, protest, or march in Charlottesville, Virginia, Defendant Jason Kessler hereby agrees to use best efforts to ensure that attendees do not, as part of a unit of two or more persons, act in concert while armed with a firearm, weapon, shield, or any item whose purpose is to inflict bodily harm. Best efforts shall include:

- a. Communicating in all promotional materials and advertisements for such event, including but not limited to social-media posts, podcasts, videos, speeches, and posters, that attendees shall not, as part of a unit of two or more persons, act in concert while armed with a firearm, weapon, shield, or any item whose purpose is to inflict bodily harm;
- b. Announcing, verbally and through signage, at any such event that attendees shall not, as part of a unit of two or more persons, act in concert while armed

with a firearm, weapon, shield, or any item whose purpose is to inflict bodily harm; and

- c. Requesting that any individuals or groups at any such event who are unwilling to comply with these requirements must leave the event.
- d. For purposes of subsections a. and b., above, communicating or announcing that attendees shall not bring any weapons to any such event shall constitute best efforts.

3. Nothing in this Consent Decree shall be construed to prohibit the otherwise lawful carrying of a firearm for one's individual self-protection; infringe the right to self-defense or defense of others as recognized under Virginia law; or prohibit the otherwise lawful organizing of a political rally.

4. 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.

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

6. 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.



7. 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.

ENTERED: 7 / 29 / 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  
QUALITY PIE  
ALAKAZAM TOYS AND GIFTS  
HAYS + EWING DESIGN STUDIO, PC  
WOLF ACKERMAN DESIGN, LLC

By:  w/permission  
R. LEE LIVINGSTON (VSB #35747)   
KYLE McNEW (VSB #73210)  
MichieHamlett PLLC  
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MARY B. MCCORD\*  
JOSHUA A. GELTZER\*  
DOUGLAS N. LETTER\*  
AMY L. MARSHAK\*  
ROBERT D. FRIEDMAN\*  
DANIEL B. RICE\*  
Institute for Constitutional Advocacy and Protection  
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600 New Jersey Ave. NW  
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\*Admitted *pro hac vice*.



JASON KESSLER

By: 

JAMES KOLENICH\*

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*Counsel for Defendant Jason Kessler*

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VIRGINIA:

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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 Defendant Elliott Kline 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 Defendant Elliott Kline.
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. Defendant Elliott Kline is hereby permanently enjoined from:
  - a. returning or soliciting other individuals or groups to return 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;

- b. instructing or facilitating the instruction of individuals or groups in the use of any weapon or technique capable of causing injury or death, knowing or intending that the weapon or technique will be used at any demonstration, rally, protest, or march, in Charlottesville, Virginia; and
- c. Issuing any commands, instructions, or directives to any group of two or more persons armed with a firearm, weapon, shield, or any item whose purpose is to inflict bodily harm, at any demonstration, rally, protest, or march, in Charlottesville, Virginia.

2. With respect to any future demonstration, rally, protest, or march in Charlottesville, Virginia, Defendant Elliott Kline hereby agrees to use best efforts to ensure that attendees do not, as part of a unit of two or more persons, act in concert while armed with a firearm, weapon, shield, or any item whose purpose is to inflict bodily harm. Best efforts shall include:

- a. Communicating in all promotional materials and advertisements for such event, including but not limited to social-media posts, podcasts, videos, speeches, and posters, that attendees shall not, as part of a unit of two or more persons, act in concert while armed with a firearm, weapon, shield, or any item whose purpose is to inflict bodily harm;
- b. Announcing, verbally and through signage, at any such event that attendees shall not, as part of a unit of two or more persons, act in concert while armed with a firearm, weapon, shield, or any item whose purpose is to inflict bodily harm; and

c. Requesting that any individuals or groups at any such event who are unwilling to comply with these requirements must leave the event.

d. For purposes of subsections a. and b., above, communicating or announcing that attendees shall not bring any weapons to any such event shall constitute best efforts.

3. Nothing in this Consent Decree shall be construed to prohibit the otherwise lawful carrying of a firearm for one's individual self-protection. Nor shall this Consent Decree be construed to infringe the right to self-defense or defense of others as recognized under Virginia law.

4. 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.

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

6. 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.

7. 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.

ENTERED: 6 / 14 / 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

By: 

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KYLE MCNEW (VSB #73210)  
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*\*Admitted pro hac vice.*

ELLIOTT KLINE

By: 

JAMES KOLENICH\*

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*Counsel for Defendant Elliott Kline*

*\*Admitted pro hac vice.*

VIRGINIA:

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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 League of the South, Inc., Michael Tubbs, and Spencer Borum 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 League of the South, Inc., Michael Tubbs, and Spencer Borum.
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) League of the South, Inc., and its directors, officers, members, and agents; (2) Michael Tubbs; and (3) Spencer Borum 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 and 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.

ENTERED: 3 / 14 / 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 CULB  
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: 

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KYLE McNEW (VSB #73210)  
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MARY B. MCCORD\*  
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*Counsel for Plaintiffs*

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*Counsel for the City of Charlottesville*

*\*Admitted pro hac vice.*

LEAGUE OF THE SOUTH, INC.  
MICHAEL TUBBS  
SPENCER BORUM

By: 

BRYAN JONES (VSB No. 87675)  
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*Counsel for Defendants League of the South,  
Inc., Michael Tubbs, and Spencer Borum*

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 Defendant Vanguard America 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 Defendant Vanguard America.
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. Defendant Vanguard America and its directors, officers, members, 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. Nothing in this Consent Decree shall be construed to prohibit the otherwise lawful carrying of a firearm for one's individual self-protection. Nor shall this Consent Decree be construed to infringe the right to self-defense or defense of others as recognized under Virginia law.

3. 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.

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

5. 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.

6. 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.

ENTERED: 6 / 14 / 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

By: 

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MARY B. MCCORD\*  
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*Counsel for Plaintiffs*

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P.O. Box 911  
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Charlottesville, VA 22902  
Tel: (434) 970-3131

*Counsel for the City of Charlottesville*

\*Admitted *pro hac vice*.

VANGUARD AMERICA

By: 

JAMES KOLENICH\*

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ELMER WOODARD (VSB #27734)

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*Counsel for Defendant Vanguard America*

*\*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 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**

1. 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 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: 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  
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ANGELO JEWELRY  
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LISA ROBERTSON (VSB #32486)

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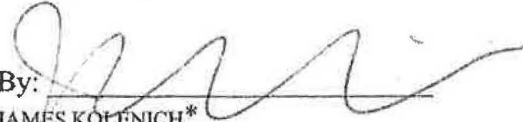
Tel: (434) 970-3131

*Counsel for the City of Charlottesville*

\*Admitted *pro hac vice*.



NATIONAL SOCIALIST MOVEMENT  
JEFF SCHOEP

By: 

JAMES KOLENICH\*

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Tel: (434) 878-3422

*Counsel for Defendants National Socialist  
Movement and Jeff Schoep*

*\*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 Defendant Traditionalist Worker Party 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 Defendant Traditionalist Worker Party.
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. Defendant Traditionalist Worker Party and its directors, officers, members, 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. Nothing in this Consent Decree shall be construed to prohibit the otherwise lawful carrying of a firearm for one's individual self-protection. Nor shall this Consent Decree be construed to infringe the right to self-defense or defense of others as recognized under Virginia law.

3. 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.

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

5. 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.

6. 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.

ENTERED: 6 / 14 / 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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JOSHUA A. GELTZER\*

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*Counsel for Plaintiffs*

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TRADITIONALIST WORKER PARTY

By: 

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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 Defendant Matthew Heimbach 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 Defendant Matthew Heimbach.
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. Defendant Matthew Heimbach is 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. Nothing in this Consent Decree shall be construed to prohibit the otherwise lawful carrying of a firearm for one's individual self-protection. Nor shall this Consent Decree be construed to infringe the right to self-defense or defense of others as recognized under Virginia law.

3. 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.

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

5. 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.

6. 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.

ENTERED: 6 / 14 / 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

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*.



MATTHEW HEIMBACH

By: 

JAMES KOLENICH\*

9435 Waterstone Blvd. #140

Cincinnati, OH 45249

Tel: (513) 444-2150

ELMER WOODARD (VSB #27734)

5661 US Hwy. 29

Blairs, VA 24527

Tel: (434) 878-3422

*Counsel for Defendant Matthew Heimbach*

*\*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: 5 / 24 / 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

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  
129<sup>th</sup> 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 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: 5 / 24 / 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

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*

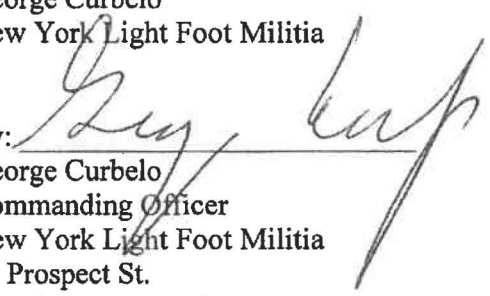
LISA ROBERTSON (VSB #32486)  
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P.O. Box 911  
605 East Main Street  
Charlottesville, VA 22902  
Tel: (434) 970-3131

*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 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: 5 / 24 / 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

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

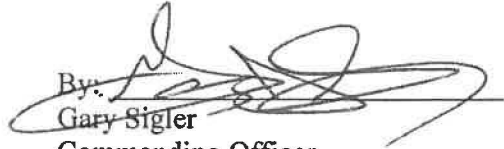
*Counsel for Plaintiffs*

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*

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 Joshua Shoaff, aka Ace Baker, and American Warrior Revolution 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 Joshua Shoaff, aka Ace Baker, and American Warrior Revolution.
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) Joshua Shoaff, aka Ace Baker and (2) American Warrior Revolution 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: 5 / 30 / 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

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*.



Joshua Shoaff, aka Ace Baker  
American Warrior Revolution

By: 

Joshua Shoaff, aka Ace Baker  
Commanding Officer  
American Warrior Revolution  
833 Cox Hollow Road  
Dover, TN 37058

*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 DECREE**

The Plaintiffs in this matter and Defendants Richard Wilson and American Freedom Keepers, LLC, 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 Richard Wilson and American Freedom Keepers, LLC.
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) Richard Wilson and (2) American Freedom Keepers, LLC, 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: 8 / 2 / 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  
QUALITY PIE  
ALAKAZAM TOYS AND GIFTS  
HAYS + EWING DESIGN STUDIO, PC

WOLF ACKERMAN DESIGN, LLC

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.*

RICHARD WILSON

AMERICAN FREEDOM KEEPERS, LLC

By: 

Richard Wilson

112 NE 14th St.

Battle Ground, WA 98604

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

**ORDER**

Upon consideration of Plaintiffs' Motion for Default Judgment, it is hereby

**ORDERED** that the Motion is **GRANTED**; and it is further

**ORDERED** that Defendant Eugene Wells is hereby permanently **ENJOINED** from:

1. returning or soliciting other individuals or groups to return to 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. instructing or facilitating the instruction of individuals or groups in the use of any weapon or technique capable of causing injury or death, knowing or intending that the weapon or technique will be used at any demonstration, rally, protest, or march, in Virginia;

3. issuing any commands, instructions, or directives to any group of two or more persons armed with a firearm, weapon, shield, or any item whose purpose is to inflict bodily harm, at any demonstration, rally, protest, or march, in Virginia.

SO ORDERED this 14<sup>th</sup> day of June, 2018.

A handwritten signature in blue ink, reading "Michael E. Moore", is written over a horizontal line.

Judge, Circuit Court for the  
City of Charlottesville

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

**ORDER**

Upon consideration of Plaintiffs' Motion for Default Judgment, it is hereby

**ORDERED** that the Motion is **GRANTED**; and it is further

**ORDERED** that Defendant Virginia Minutemen Militia and its directors, officers, members, and successors are hereby permanently **ENJOINED** from:

1. returning or soliciting other individuals or groups to return to 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. instructing or facilitating the instruction of individuals or groups in the use of any weapon or technique capable of causing injury or death, knowing or intending that the weapon or technique will be used at any demonstration, rally, protest, or march, in Virginia;

3. issuing any commands, instructions, or directives to any group of two or more persons armed with a firearm, weapon, shield, or any item whose purpose is to inflict bodily harm, at any demonstration, rally, protest, or march, in Virginia.

SO ORDERED this 14<sup>th</sup> day of June, 2018.

A handwritten signature in blue ink, appearing to read "Michael P. Moore", written over a horizontal line.

Judge, Circuit Court for the  
City of Charlottesville



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 Defendant Redneck Revolt 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 Defendant Redneck Revolt.
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. Defendant Redneck Revolt and its chapters, branches, and John Brown Gun Clubs; and their directors, officers, members, and successors (collectively, "Redneck Revolt"), 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. Nothing in this Consent Decree shall be construed to infringe the right to self-defense or defense of others as recognized under Virginia law.

3. 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.

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

5. 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.

6. 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.

ENTERED: 7 / 23 / 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  
QUALITY PIE  
ALAKAZAM TOYS AND GIFTS  
HAYS + EWING DESIGN STUDIO, PC  
WOLF ACKERMAN DESIGN, LLC

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