

1 Larry J. Wulkan (Bar No. 021404)  
Javier Torres (Bar No. 0032397)  
2 **STINSON LLP**  
1850 North Central Avenue, Suite 2100  
3 Phoenix, Arizona 85004-4584  
Tel: (602) 279-1600  
4 Fax: (602) 240-6925  
Email: larry.wulkan@stinson.com  
5 javier.torres@stinson.com

6 David C. Dinielli\*  
Beth D. Jacob\*  
7 **SOUTHERN POVERTY LAW CENTER**  
400 Washington Avenue  
8 Montgomery, Alabama 36104  
Tel: (334) 956-8200  
9 Fax: (334) 956-8481  
Email: david.dinielli@splcenter.org  
10 beth.jacob@splcenter.org

11 J. Tyler Clemons\*  
12 **SOUTHERN POVERTY LAW CENTER**  
201 S. Charles Avenue, Suite 2000  
New Orleans, Louisiana 70170  
13 Tel: (504) 526-1530  
Fax: (504) 486-8947  
14 Email: tyler.clemons@splcenter.org

15 *\*Application for Admission Pro Hac Vice Forthcoming*

16 Attorneys for Plaintiffs

17 **UNITED STATES DISTRICT COURT**  
18 **DISTRICT OF ARIZONA**

19 Alliance of Christian Leaders of the East  
Valley; Magdalena Schwartz, in her  
20 individual capacity and as president  
pastor of Alliance of Christian Leaders of  
21 the East Valley; Iglesia Alfa y Omega;  
Elias Garcia, in his individual capacity  
22 and as pastor of Iglesia Alfa y Omega;  
Iglesia Monte Vista; Angel Campos, in  
23 his individual capacity and as pastor of  
Iglesia Monte Vista; Iglesia Nueva  
24 Esperanza; Israel Camacho, in his  
individual capacity and as pastor of  
25 Iglesia Nueva Esperanza; Iglesia  
Apostolica; Helping With All My Heart,  
26 Inc., an Arizona non-profit corporation;  
Cristobal Perez, in his individual  
27 capacity and as pastor of Iglesia  
Apostolica De La Comunidad; Iglesia  
28 Cristiana El Buen Pastor; Hector

No.

**COMPLAINT**

1 Ramirez, in his individual capacity and as  
2 pastor of Iglesia Cristiana El Buen Pastor;  
Terence Driscoll,

3 Plaintiffs,

4 v.

5 Patriot Movement AZ; AZ Patriots;  
6 Jennifer Harrison; Sean Harrison; Lesa  
7 Antone; Russell Jaffe; Jeremy Bronaugh;  
Antonio Foreman; Laura Damasco; Tami  
Jo Garver; Michael Pavlock; “Brandi  
Payne”; Jane Roe; “Eduardo Jaime”;  
John Does 1 & 2,

8 Defendants.

9 **INTRODUCTION**

10 1. Plaintiffs are churches; an alliance including these and other churches;  
11 pastors; and other individuals who have been working together and with United States  
12 Immigration and Customs Enforcement (“ICE”) to assist asylum seekers, refugees, and  
13 immigrants (collectively, “Immigrants”) after they are released from ICE custody.

14 2. Defendants are two unincorporated associations, their members, and their  
15 supporters, who are motivated, at least in part, by animus against Central Americans and  
16 people of color. Through their illegal actions, they are attempting to prevent Plaintiffs  
17 from assisting Immigrants from Central America and Immigrants who are people of color.

18 3. Plaintiffs seek a permanent injunction against Defendants’ illegal conduct  
19 as well as appropriate damages. Plaintiffs do not ask this Court to stop Defendants from  
20 expressing their opinions, but rather that they be ordered to stay off of church property  
21 and within a safe distance of the churches. Plaintiffs also ask that Defendants be ordered  
22 to stop illegally intimidating, threatening, harassing or otherwise interfering with  
23 Plaintiffs’ ability to invite guests onto their property and into their buildings or homes.

24 **JURISDICTION AND VENUE**

25 4. The subject matter and parties fall under this Court’s jurisdiction under 28  
26 U.S.C. § 1331.

27 5. The Court has jurisdiction over Plaintiffs’ state law claims pursuant to 28  
28 U.S.C. § 1367.



1 23. Pastor Camacho resides in Mesa, Arizona.

2 24. Iglesia Apostolica De La Comunidad is a Spanish-speaking, non-  
3 denominational Christian church in Phoenix, Arizona.

4 25. A majority of the members of Iglesia Apostolica De La Comunidad identify  
5 as Hispanic.

6 26. Cristobal Perez is the senior pastor of Iglesia Apostolica De La Comunidad.

7 27. Pastor Perez resides in Phoenix, Arizona

8 28. Helping With All My Heart, Inc. is an Arizona non-profit corporation.

9 29. Pastor Perez is the executive director of Helping With All My Heart.  
10 Helping With All My Heart serves the homeless, visits rehabilitation centers, and runs a  
11 food bank and jail ministry.

12 30. Helping With All My Heart's volunteers are largely composed of the  
13 members of Iglesia Apostolica De La Comunidad.

14 31. Iglesia Cristiana El Buen Pastor is a Spanish-speaking, non-denominational  
15 Christian church in Mesa, Arizona.

16 32. A majority of the members of Iglesia Cristiana El Buen Pastor identify as  
17 Hispanic.

18 33. Hector Ramirez is the senior pastor of Iglesia Cristiana El Buen Pastor.

19 34. Pastor Ramirez resides in Mesa, Arizona.

20 35. Terence Driscoll resides in Phoenix, Arizona.

21 **Defendants**

22 36. Defendant Patriot Movement AZ is an unincorporated association based in  
23 Litchfield Park, Arizona.

24 37. Defendant Patriot Movement AZ was founded by Defendants Lesa Antone  
25 and Russell Jaffe in 2017.

26 38. Defendant Patriot Movement AZ maintains a public Facebook page at  
27 <https://www.facebook.com/PatriotMovementAZ>, a closed Facebook group at  
28 [https://www.facebook.com/groups/471505516674091/?source\\_id=1627282800649968](https://www.facebook.com/groups/471505516674091/?source_id=1627282800649968),

1 a YouTube account at [https://www.youtube.com/channel/UCIF9j\\_wt1dXEF9aaO-](https://www.youtube.com/channel/UCIF9j_wt1dXEF9aaO-)  
2 7GDpg, and a Twitter account at [https://www.twitter.com/AZ\\_Movement](https://www.twitter.com/AZ_Movement).

3 39. On its Facebook page, Defendant Patriot Movement AZ describes itself as  
4 a group of “Constitutional Americans who believe in America First, Capitalism, Life,  
5 Liberty, and the Pursuit of Happiness” who are “active in our communities in exposing  
6 the corruption of the far left agenda.”

7 40. Defendant Patriot Movement AZ has been designated as a hate group by  
8 the Southern Poverty Law Center (“SPLC”).

9 41. Defendant Lesa Antone is a founder of Patriot Movement AZ.

10 42. Defendant Antone resides in Litchfield Park, Arizona.

11 43. Defendant Russell “RJ” Jaffe is a leader of Patriot Movement AZ.

12 44. Defendant Jaffe resides in Litchfield Park, Arizona.

13 45. Defendant Antonio Foreman has visited at least one church with Patriot  
14 Movement AZ members in Phoenix, Arizona.

15 46. Defendant Foreman is affiliated with multiple white nationalist hate groups.

16 47. Defendant Foreman attended the August 2017 “Unite the Right” rally in  
17 Charlottesville, Virginia.

18 48. Defendant Tami Jo Garver, also known as “Tami Dupra” and “Tami Jo  
19 Rud,” is a member of Patriot Movement AZ.

20 49. Defendant Garver is affiliated with Defendants Harrison and Antone.

21 50. Defendant Garver resides in Glendale, Arizona.

22 51. Defendant Michael Pavlock, also known as “Mikey Lee,” is a member of  
23 Patriot Movement AZ.

24 52. Defendant Pavlock resides in Peoria, Arizona.

25 53. Defendant Laura Damasco is a member of Patriot Movement AZ.

26 54. Defendant Damasco resides in Sun City West, Arizona.

27 55. Defendant “Brandi Payne,” believed to be an alias, is a member of Patriot  
28 Movement AZ.

1           56. Defendant Payne has visited Arizona churches with Patriot Movement AZ  
2 members on at least three occasions, including visits on December 29 and December 31,  
3 2018, and January 5, 2019.

4           57. Discovery is likely to reveal the true name of Defendant Payne.

5           58. Defendant Jane Roe is a member of Patriot Movement AZ.

6           59. Defendant Jane Roe has visited at least one Arizona church with Patriot  
7 Movement AZ members, including a visit on December 29, 2018.

8           60. Discovery is likely to reveal the identity of Defendant Jane Roe.

9           61. Defendant "Eduardo Jaime," believed to be an alias, is a member of Patriot  
10 Movement AZ.

11           62. Defendant Jaime has visited at least one Arizona church with Patriot  
12 Movement AZ members, including a visit on December 31, 2018.

13           63. Discovery is likely to reveal the true name of Defendant Jaime.

14           64. Defendant John Doe 1 is associated with Patriot Movement AZ.

15           65. Defendant John Doe 1 has visited at least one Arizona church with Patriot  
16 Movement AZ members, including a visit on January 5, 2019.

17           66. Discovery is likely to reveal the identity of Defendant John Doe 1.

18           67. Defendant John Doe 2 is associated with Patriot Movement AZ.

19           68. Defendant John Doe 2 has visited Arizona churches with Patriot Movement  
20 AZ members on at least two occasions, including visits on December 29 and December  
21 31, 2018.

22           69. Discovery is likely to reveal the identity of Defendant John Doe 2.

23           70. Defendant AZ Patriots is an unincorporated association based in Litchfield  
24 Park, Arizona.

25           71. Defendant AZ Patriots was founded on or about February 18, 2019 by  
26 Defendants Jennifer Harrison and Jeremy Bronaugh, who were active members of Patriot  
27 Movement AZ until that point.

28

1 72. Defendant AZ Patriots maintains a Facebook page at  
2 <https://www.facebook.com/AZPatriotsUnited>.

3 73. Defendant AZ Patriots describes itself as “a group of committed Americans  
4 bringing you live footage of the issues you care about most around Arizona. Live from  
5 the border, the State Capitol and throughout Arizona’s political scene.”

6 74. Defendant AZ Patriots and its leading members have already engaged in  
7 much of the same illegal conduct and rhetoric that they did as Patriot Movement AZ  
8 members.

9 75. Defendant Jennifer Harrison was a member of Patriot Movement AZ from  
10 at least January 2018 until approximately February 18, 2019.

11 76. Defendant Harrison resides in Peoria, Arizona.

12 77. Defendant Sean Harrison is the spouse of Defendant Jennifer Harrison.

13 78. Defendant Sean Harrison resides in Peoria, Arizona.

14 79. Defendant Jeremy Bronaugh was a member of Patriot Movement AZ from  
15 at least January 2018 until approximately February 18, 2019.

16 80. Defendant Bronaugh resides in Goodyear, Arizona.

17 **COMMON ALLEGATIONS OF FACT**

18 81. Since at least October 2018, ICE has brought Immigrants who are being  
19 released from ICE custody to Plaintiff churches.

20 82. Plaintiffs and their volunteers receive the Immigrants at their churches and  
21 provide them with food, clothing, basic medical care, and other necessities.

22 83. Plaintiffs help the Immigrants arrange travel to their U.S. sponsors.

23 84. Plaintiffs provide overnight housing and shelter for the Immigrants.

24 85. Plaintiffs and their volunteers drive the Immigrants to bus stations or  
25 airports for their travel to their U.S. sponsors.

26 86. In this way, Plaintiffs assist Immigrants who often do not speak English and  
27 are unfamiliar with transportation in the United States.

28

1 87. Since October 2018, Plaintiffs have assisted thousands of Immigrants  
2 released by ICE to reach their U.S. sponsors.

3 88. On March 21, 2019, Henry Lucero, the Phoenix field director for ICE,  
4 stated, "If [the people assisting the Immigrants] were breaking the law, ICE wouldn't give  
5 them a ride there. They're just doing something out of the goodness of their hearts. Trying  
6 to help people find a way to where they're going."

7 89. Plaintiffs depend on donations and volunteers from their congregations and  
8 the broader Phoenix community to help them to assist the Immigrants.

9 90. Plaintiffs do not receive government funding or payments to support their  
10 assistance to the Immigrants.

11 91. During the first few months that they assisted the Immigrants, Plaintiffs  
12 freely publicized their efforts, including on their Facebook pages and other social media,  
13 and publicly solicited donations and volunteers.

14 92. Plaintiffs' outreach resulted in considerable support from the Phoenix  
15 community.

16 93. Starting about December 26, 2018, Defendants have gone to churches  
17 where ICE has dropped off Immigrants many times.

18 94. Defendants' purpose is to intimidate Plaintiffs and others to stop them from  
19 assisting the Immigrants.

20 95. Many of these visits were filmed by Defendants and those videos have been  
21 posted to their public Facebook pages, on YouTube, or both.

22 96. Defendants' behavior during their visits to the churches has intimidated and  
23 caused Plaintiffs anxiety and fear for their safety and the safety of others.

24 97. Uninvited or deceptively, Defendants trespassed on church property,  
25 including the lawns or paths leading to the church buildings and the parking lots used by  
26 the churches.

27 98. Defendants came close to people who were working at the churches, often  
28 only inches away, and yelled in their faces.



1           99. Defendants held their cell phones to film people, including their faces and  
2 their nametags.

3           100. At some of the visits, some of the Defendants have openly carried guns.

4           101. When the Immigrants, who were invited guests of the churches, arrived,  
5 Defendants loudly yelled insults at them and at Plaintiffs.

6           102. Defendants told the Immigrants to leave and accused Plaintiffs of criminal  
7 conduct—including sex trafficking or human trafficking—and of profiting financially.

8           103. These statements not only were heard by Plaintiffs' neighbors and by  
9 passers-by, but also were posted online by Defendants.

10          104. Defendants have sometimes trespassed inside the church buildings  
11 themselves.

12          105. Defendants ignored requests to leave the church property, or moved off the  
13 property and then returned.

14          106. When asked to stop filming people, Defendants refused.

15          107. Defendants filmed children, including their faces, and posted those images  
16 online.

17          108. Defendants filmed people on private property and took photographs  
18 through barriers, such as by climbing on walls and by peeking through or over fences and  
19 through windows.

20          109. Defendants posted their videos online and usually included the names and  
21 addresses of the churches.

22          110. Defendants sometimes included the names and contact information for  
23 individual pastors.

24          111. In the posted videos and on their social media, Defendants encouraged  
25 others to contact the churches and the pastors.

26          112. Sometimes following these postings, Plaintiffs received social media  
27 messages and telephone calls criticizing their assistance to the Immigrants, often using  
28 hostile and threatening language.

1           113. These messages and calls also included threats to the pastors' buildings and  
2 their families.

3           114. Defendants have also entered churches under false pretenses by posing as  
4 volunteers or donors.

5           115. On February 18, 2019, Defendant Garver told a radio show host that she  
6 goes "in undercover for Patriot Movement AZ to several churches to find out what's  
7 actually going on on the inside of these churches."

8           116. Defendant Antone told the same radio host that Patriot Movement AZ  
9 makes Garver "go play liberal" to gain access to the churches.

10           117. Similarly, Defendant Foreman stated on his Facebook page that he forced  
11 his way into Iglesia Alfa y Omega as it was receiving Immigrants on January 5, 2019.

12           118. Defendant Foreman stated on his Facebook page that he told volunteers that  
13 he was homeless and demanded to be fed.

14           119. Defendant Foreman was visibly armed with a gun during the encounter  
15 described in paragraphs 117 to 118.

16           120. Pastors and churches within the Alliance, including Plaintiffs, learned about  
17 the encounter with Defendant Foreman shortly after it occurred.

18           121. Defendants' campaign of harassment has interfered with Plaintiffs' ability  
19 to assist the Immigrants.

20           122. Plaintiffs have adopted security measures to protect themselves, the  
21 Immigrants, and their volunteers and donors in response to Defendants' conduct.

22           123. Many volunteers and workers have stopped wearing nametags as a result of  
23 Defendants' conduct.

24           124. The number of volunteers and donations also has declined substantially as  
25 a result of Defendants' conduct.

26           125. Some volunteers and donors have stated that they would not continue  
27 volunteering or donating because they were intimidated by Defendants' actions.

28



1 139. As of May 1, 2019, that video had received approximately 200,000 views  
2 and been shared nearly 5,000 times.

3 140. Defendants Harrison and Antone visited Alfa y Omega as it was receiving  
4 Immigrants on at least two other occasions, January 2, 2019 and February 6, 2019.

5 141. Each time they behaved in a similar manner and shouted similar things at  
6 the Immigrants, volunteers, and church members.

7 142. As a result of Defendants' conduct, Alfa y Omega put up no trespassing  
8 signs to protect church members, the Immigrants, volunteers, and donors.

9 143. Alfa y Omega has cut back on public solicitations for volunteers and  
10 donations for fear that they would attract even more harassment from Defendants,  
11 resulting in a steep decline in donations.

12 144. Other congregations share the church building with Alfa y Omega. They  
13 have expressed concerns about Defendants' conduct to Pastor Garcia and have asked Alfa  
14 y Omega to stop assisting the Immigrants because Defendants' conduct has upset them  
15 and made them afraid for their congregants' safety.

16 **Iglesia Monte Vista**

17 145. Iglesia Monte Vista and Pastor Angel Campos began assisting the  
18 Immigrants in October 2018.

19 146. Defendants first visited Iglesia Monte Vista on December 28, 2018.

20 147. Defendants Harrison and Antone stood in the church parking lot, which is  
21 part of church property.

22 148. When the ICE buses carrying the Immigrants arrived, Defendants Harrison  
23 and Antone began yelling insults at the Immigrants, volunteers, and church members.

24 149. Defendants Harrison and Antone said that Monte Vista was "breaking the  
25 law" as well as "aiding and abetting" violations of the law.

26 150. Defendants Harrison and Antone also said that they had "heard that they  
27 [the Immigrants] have lice and tuberculosis."  
28

1 151. Defendants approached many volunteers and asked them questions in a  
2 hostile manner while filming them with their cell phones held only a few feet from the  
3 volunteers' faces.

4 152. Defendants Harrison and Antone filmed the Immigrants' faces despite  
5 being asked repeatedly not to do so.

6 153. When Pastor Campos informed Defendants that they were on private  
7 property and asked them to leave, Defendants refused to do so and stated that they would  
8 not leave until the police arrived.

9 154. Defendants did not leave church property until after Pastor Campos called  
10 the police.

11 155. Defendants Harrison and Antone each filmed the December 28, 2018,  
12 events and posted several videos to the Patriot Movement AZ Facebook page. Those  
13 videos clearly show the faces of the Immigrants, including the faces of young children.

14 156. As of May 1, 2019, those videos had received a total of 518,000 views and  
15 have been shared nearly 12,000 times.

16 157. Defendants Harrison and Antone returned to Monte Vista twice on  
17 December 31, 2018.

18 158. The first time they were accompanied by Defendants Damasco, Roe, and  
19 Doe 2, and stood on the sidewalk beside the church parking lot.

20 159. Using a megaphone, Defendants accused Pastor Campos of being paid to  
21 assist Immigrants multiple times, chanted "shame on you," and asked "when are the  
22 illegals showing up?"

23 160. Later on December 31, Defendants Harrison and Antone returned to Monte  
24 Vista, this time accompanied by Defendants Pavlock, Roe, and Doe 1.

25 161. Through a megaphone, Defendants yelled insults and accusations including  
26 "You're not really a house of God; you're a cash machine"; "You're not providing aid;  
27 you're making bank"; and "I guess you don't get \$1,800 per head for conservatives, huh?  
28 Americans just don't pay as much as illegal aliens."

1           162. Defendants also criticized Monte Vista for putting up caution tape to  
2 prevent their trespassing, chanting “Tear down your wall!”

3           163. Defendant Antone argued with a volunteer as someone among the  
4 Defendants chanted “punch her.”

5           164. Shortly thereafter, the police arrived and escorted the volunteer into the  
6 church.

7           165. The volunteer was visibly upset. She later told Pastor Campos that she  
8 would no longer volunteer because of this experience.

9           166. Defendants filmed both incidents on December 31, 2018, and posted the  
10 videos to the Patriot Movement AZ Facebook page.

11           167. Defendant Damasco also separately filmed the second visit and posted it to  
12 her Periscope page.

13           168. As of May 1, 2019, those videos had received a total of 99,000 views and  
14 had been shared 4,700 times.

15           169. On January 2, 2019, Immigrant children were playing on the Monte Vista  
16 playground, which is private property and separated from the sidewalk and street by a  
17 fence.

18           170. As the children were playing, Defendants Harrison and Antone drove  
19 slowly through the alley behind Monte Vista. Defendant Harrison began filming the  
20 children through the fence using her cell phone.

21           171. When a church worker appeared to investigate, Defendants avoided him  
22 and circled around the block in their vehicle. When they returned to the alley, the children  
23 had been taken inside.

24           172. Defendants posted the January 2, 2019 video of the children to Patriot  
25 Movement AZ’s Facebook page. In the video, Defendants clearly say Pastor Angel  
26 Campos’s name and state: “This is a federally funded human trafficking ring.”

27

28

1 173. Referencing a pair of pants hanging on the church fence, Defendants stated:  
2 “They’re bringing Little Mexico to the fence. Look, that’s how they’re drying their  
3 clothes.”

4 174. The video clearly shows the faces of young Immigrant children.

5 175. As of May 1, 2019, the video had received a total of 28,000 views and had  
6 been shared 693 times.

7 176. Monte Vista has received messages on its Facebook page and Pastor  
8 Campos has received texts and voicemails to his personal cell phone that use the same  
9 language or language similar to Defendants’ statements when they visited Monte Vista.

10 177. Pastor Campos’s minor children have seen some of those messages and  
11 have expressed fear for his safety and their own.

12 178. As a result of Defendants’ conduct, Monte Vista has put up “no trespassing”  
13 signs and caution tape around the boundaries of church property to protect the Immigrants  
14 and volunteers.

15 179. As a result of Defendants’ conduct, Monte Vista has cut back on public  
16 solicitations for volunteers and donations for fear that they would attract even more  
17 harassment from Defendants, resulting in a steep decline in donations.

18 180. Pastor Campos is aware of Defendants’ conduct at other churches and was  
19 particularly concerned by Defendant Foreman’s forcing his way into Iglesia Alfa y  
20 Omega with a gun in late January.

21 181. Some volunteers have also told Pastor Campos that Defendants’ conduct  
22 has made them afraid to continue volunteering to assist the Immigrants.

23 **Iglesia Nueva Esperanza**

24 182. Iglesia Nueva Esperanza and Pastor Israel Camacho began assisting the  
25 Immigrants in October 2018.

26 183. Defendants first visited Iglesia Nueva Esperanza on January 25, 2019.

27 184. Defendants Harrison and Bronaugh approached the church shortly after an  
28 ICE bus arrived to drop off Immigrants.

1 185. The church property includes a grass strip that is separated from the private  
2 sidewalk by a low stone wall. Defendants stood on this grass strip while Defendant  
3 Harrison shouted insults and accusations at the church, volunteers, and the Immigrants.

4 186. As the Immigrants exited the bus, Harrison shouted “fuera!” (“get out!” in  
5 Spanish) and “criminals” at them.

6 187. Defendant Harrison also told a bystander: “Hopefully, ma’am, they [the  
7 Immigrants] don’t get loose and rape any of those little kids.”

8 188. Defendant Harrison also yelled: “You are human trafficking at this church.”  
9 She singled out Pastor Magdalena Schwartz in particular, shouting: “Magdalena, you  
10 know what you’re doing. You know those kids don’t belong to those men. How much are  
11 you getting paid, Magdalena? How much are you getting paid to human traffick  
12 children?”

13 189. Defendant Bronaugh stood beside Harrison throughout this tirade,  
14 supporting and participating in her conduct.

15 190. Defendant Harrison filmed the January 25, 2019, event using her cell  
16 phone.

17 191. At one point, Defendant Harrison attempted to climb up on the stone wall  
18 so that she could better film the Immigrants as they got off the bus.

19 192. When a volunteer approached her and told her that she was trespassing,  
20 Harrison responded: “Aren’t they [the Immigrants] trespassing in our country, sir?” She  
21 and Bronaugh refused to leave until the volunteer called the police, after which she told  
22 viewers: “I’m gonna get out of here so I don’t get trespassed. Because the golden rule is:  
23 You can’t trespass me if you can’t catch me!”

24 193. The video of the January 25, 2019, event was posted on Patriot Movement  
25 AZ’s Facebook page.

26 194. As of May 1, 2019, the video had received a total of 64,384 views and had  
27 been shared 2,361 times.

28



1           195. Defendants Harrison and Bronaugh returned to Nueva Esperanza twice on  
2 February 22, 2019. They followed an ICE bus transporting the Immigrants to the church  
3 in the afternoon and filmed as they exited the bus.

4           196. Defendants Harrison and Bronaugh both accused the church and volunteers  
5 of breaking the law, shouting: “This church is promoting human trafficking” and later  
6 chanting “Criminal! Criminal! Criminal!”

7           197. Defendant Harrison also accused the Immigrants of bringing diseases into  
8 Phoenix, yelling: “Smallpox and all kinds of diseases are coming in too.”

9           198. When Defendants were asked to leave the church property and the parking  
10 lot, they refused. They finally left after the police arrived and spoke with them.

11           199. Defendants Harrison and Bronaugh returned to Nueva Esperanza the night  
12 of February 22, 2019.

13           200. At that time, members of the community who volunteered to let Immigrant  
14 families stay at their homes overnight were at the church picking up their guests.

15           201. Defendants Harrison and Bronaugh came into the parking lot where the  
16 volunteers’ cars were parked.

17           202. They approached within a few feet of the cars in an attempt to take video  
18 of the Immigrants, their hosts, and the license plates on the cars.

19           203. When a Latino volunteer became visibly upset and accused Harrison of  
20 being racist, Harrison yelled at Pastor Schwartz: “Control your dogs, Magdalena.”

21           204. Defendants also repeatedly approached Pastor Schwartz, yelling at her  
22 about breaking the law and being the “ring leader.” They only moved away from Pastor  
23 Schwartz and the volunteers when the police arrived.

24           **Iglesia Apostolica De La Comunidad / Helping With All My Heart**

25           205. Iglesia Apostolica De La Comunidad and Pastor Cristobal Perez began  
26 assisting the Immigrants in November 2018 by having its members volunteer at Helping  
27 With All My Heart.

28           206. Defendants began visiting Helping With All My Heart in January 2019.

1           207. For example, Defendants Harrison and Antone followed an ICE bus to  
2 Helping With All My Heart on February 6, 2019.

3           208. They stood on the sidewalk mere feet from the doors of the bus as  
4 Immigrants filed off, filming the Immigrants, volunteers, and church members with their  
5 cell phones.

6           209. They chanted “fuera de aqui!” (“get out of here!” in Spanish) and “This is  
7 not your home!” and yelled “Whose child is that? Whose child are you bringing in?” at  
8 Immigrants.

9           210. They repeatedly accused the church and its volunteers of breaking the law  
10 and engaging in human trafficking, shouting “This church is aiding in human trafficking.  
11 That’s what you’re complicit in” and “American border patrol says this is human  
12 trafficking, human smuggling!”

13           211. Defendants filmed the February 6, 2019, incident and posted the video on  
14 Patriot Movement AZ’s Facebook page.

15           212. As of May 1, 2019, the video had received 52,000 views and had been  
16 shared 1,800 times.

17           213. Defendants Harrison and Antone have visited Helping With All My Heart  
18 at least three times.

19           214. Each time they behaved in a similar manner and shouted similar things at  
20 the Immigrants, volunteers, and church members.

21           215. As a result of Defendants’ conduct, Pastor Perez and his volunteers are  
22 worried every time an ICE bus comes to Helping With All My Heart.

23           216. They are aware of Defendants’ conduct at other churches and are  
24 particularly concerned by Defendant Foreman’s forcing his way into Iglesia Alfa y  
25 Omega with a gun in late January.

26           217. Pastor Perez feels he must spend more time protecting his volunteers; as a  
27 result, he has less time to oversee the operation to assist the Immigrants.

28

1 218. Pastor Perez and Helping With All My Heart have begun hiring paid guards  
2 to be present during Immigrant drop offs because of Defendants' conduct.

3 **Iglesia El Cristiana Buen Pastor**

4 219. Iglesia Cristiana El Buen Pastor and Pastor Hector Ramirez began assisting  
5 the Immigrants in the Fall of 2018.

6 220. Although Defendants have not yet visited Buen Pastor, Pastor Hector  
7 Ramirez and church members are aware of Defendants' conduct at other churches and are  
8 particularly concerned by Defendant Foreman's forcing his way into Iglesia Alfa y  
9 Omega with a gun in late January.

10 221. As a result of Defendants' conduct, Buen Pastor and Pastor Ramirez have  
11 stopped advertising for volunteers and donations for fear that doing so would attract  
12 harassment from Defendants.

13 222. Buen Pastor has also posted volunteers to act as security guards to attend  
14 its gates while it is receiving Immigrants.

15 223. Pastor Ramirez has also volunteered to drive Immigrants to the airport.

16 224. As a result of Defendants' conduct, Pastor Ramirez has driven fewer  
17 Immigrants to the airport because he believes he needs to be at Buen Pastor in case  
18 Defendants show up there.

19 **Terence Driscoll**

20 225. Terence Driscoll is a volunteer who assists churches in their efforts to help  
21 the Immigrants.

22 226. As part of his volunteer work, Driscoll has driven Immigrant families from  
23 churches to the Phoenix airport.

24 227. On January 11, 2019, Driscoll drove an Immigrant woman and her young  
25 daughter from a church to the airport.

26 228. When he arrived at the church, Driscoll observed Defendant Patriot  
27 Movement AZ members in a black Dodge Charger photographing or filming in the church  
28 parking lot.



1           235. Defendants have agreed to and engaged in a conspiracy to harass Plaintiffs  
2 and to intimidate them into stopping their assistance to Immigrants.

3           236. Using a private Facebook group and other forms of communication,  
4 Defendants circulate information regarding the dates and times that Plaintiffs will receive  
5 Immigrants.

6           237. Based on this information, multiple Defendants arrive at Plaintiffs' property  
7 at the same time.

8           238. Defendants sometimes share vehicles to arrive at and leave Plaintiffs'  
9 property.

10           239. While at Plaintiffs' property, Defendants stand close to one another, speak  
11 to one another with familiarity, and chant similar or identical things—sometimes in  
12 unison.

13           240. Defendants engage in coordinated schemes to impersonate volunteers or  
14 donors to enter Plaintiffs' property.

15           241. Defendants have demonstrated racial animus against the Hispanic race of  
16 Plaintiffs and the Immigrants whom Plaintiffs are assisting.

17           242. Defendants' racial animus is evidenced by such acts as their targeting of  
18 Hispanic churches; by their derogatory references to "Little Mexico"; by their  
19 comparisons of Hispanic Immigrants to dogs; and by their repeated references to Hispanic  
20 Immigrants as carriers of contagious diseases and lice.

21           243. Defendants' conspiracy is motivated by discriminatory animus against the  
22 Hispanic race.

23           244. Defendants' racist animus is also evidenced by conduct unrelated to  
24 Plaintiffs.

25           245. In January 2018, for instance, Defendants—including specifically  
26 Defendants Jennifer Harrison and Lesa Antone—went to the Arizona capitol building to  
27 protest immigration reform.  
28









1 **COUNT FIVE**

2 **(Appropriation or Invasion of the Right of Publicity)**

3 279. Plaintiffs incorporate the allegations in the above paragraphs as if fully set  
4 forth herein.

5 280. Defendants have filmed the Immigrants, Alliance members, church  
6 members, volunteers, and others and posted those recordings on Defendants' Facebook  
7 pages, YouTube, and other social media accounts.

8 281. Defendants did not obtain consent for these recordings.

9 282. To film Plaintiffs, Defendants have held their cell phones up to individuals  
10 and filmed their faces, nametags, cars, and license plates.

11 283. Defendants used these recordings to their own advantage by both increasing  
12 hits on their Facebook pages or YouTube channels and in an attempt to further an anti-  
13 immigrant social and political agenda.

14 284. Defendants continued to film people even when asked not to do so.

15 285. Recordings included children, whose recognizable faces were posted  
16 online.

17 286. Defendants used Plaintiffs' identities, names, and faces without consent to  
18 advantage themselves and hurt Plaintiffs and to get more hits on social media and spread  
19 their anti-immigrant social and political agenda.

20 287. Defendants' wrongful conduct constitutes appropriation or invasion of the  
21 right of publicity under Arizona law.

22 **COUNT SIX**

23 **(Intrusion into a Private Place)**

24 288. Plaintiffs incorporate the allegations in the above paragraphs as if fully set  
25 forth herein.

26 289. Defendants filmed people on private property by climbing walls and fences  
27 created for the very purpose of ensuring privacy.

1 290. The steps taken to make these recordings illustrate that Defendants intended  
2 to capture private moments.

3 291. Expecting privacy behind barriers on private property is reasonable.

4 292. Defendants also pretended to be donors, volunteers, "liberal," or homeless  
5 to get into churches to hear private conversation and watch the Immigrants as they sought  
6 assistance in churches.

7 293. Defendants were motivated by furthering an anti-immigrant agenda  
8 centered on proving Plaintiffs were engaging in sex and human trafficking.

9 294. Defendants intruded into private parts of churches to access the very places  
10 individuals have an expectation of privacy in a highly offensive manner with the objective  
11 of accessing private information.

12 295. Defendants' wrongful conduct constitutes intrusion into a private place  
13 under Arizona law.

14 **COUNT SEVEN**

15 **(Trespass)**

16 296. Plaintiffs incorporate the allegations in the above paragraphs as if fully set  
17 forth herein.

18 297. Uninvited or deceptively, Defendants have entered onto church property,  
19 including lawns or paths leading to the church buildings and the parking lots used by the  
20 churches.

21 298. Defendants have entered church buildings without invitation or by  
22 pretending to be volunteers.

23 299. Defendant Foreman attempted to force himself into a church while armed  
24 with a gun.

25 300. When asked to leave from church property, Defendants either ignored the  
26 request or left but returned later.

27 301. Defendants intentionally entered into the property of others and at times  
28 refused to leave.

1 302. Defendants' wrongful conduct constitutes trespass under Arizona law.

2 **REQUESTED RELIEF**

3  
4 WHEREFORE Plaintiffs respectfully request an award of the following relief:

5 A. A declaratory judgment that the actions described herein deprived Plaintiffs  
6 of their rights under federal and state law.

7 B. Injunctive relief enjoining Defendants from future violations of rights  
8 guaranteed by federal and state law.

9 C. Compensatory and statutory damages in an amount to be determined.

10 D. Punitive damages in an amount to be determined.

11 E. Such other relief as the Court may deem just and proper.

12 RESPECTFULLY SUBMITTED this 4<sup>th</sup> day of June, 2019.

13 **STINSON LLP**

14 By: /s/ Larry J. Wulkan

15 Larry J. Wulkan  
16 Javier Torres  
1850 North Central Avenue, Suite 2100  
Phoenix, Arizona 85004-4584

17 David C. Dinielli\*  
18 Beth D. Jacob\*  
**SOUTHERN POVERTY LAW CENTER**  
400 Washington Avenue  
19 Montgomery, Alabama 36104  
20 Tel: (334) 956-8200  
Fax: (334) 956-8481  
21 Email: david.dinielli@splcenter.org  
beth.jacob@splcenter.org

22 J. Tyler Clemons\*  
**SOUTHERN POVERTY LAW CENTER**  
23 201 St. Charles Avenue, Suite 2000  
24 New Orleans, Louisiana 70170  
25 Tel: (504) 526-1530  
Fax: (504) 486-8947  
26 Email: tyler.clemons@splcenter.org

*\*Application for Admission Pro Hac Vice  
Forthcoming*

27 Attorneys for the Plaintiffs