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UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Alliance of Christian Leaders of the East Valley; Magdalena Schwartz, in her individual capacity and as president pastor of Alliance of Christian Leaders of the East Valley; Iglesia Alfa y Omega; Elias Garcia, in his individual capacity and as pastor of Iglesia Alfa y Omega;

PRELIMINARY RECITALS

Plaintiffs

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3 1. Alliance of Christian Leaders of the East Valley (“Alliance”) is a nonprofit
4 organization comprised of pastors of several Hispanic churches in the Phoenix metropolitan
5 area.

6 2. Magdalena Schwartz is a pastor and a resident of Mesa, Arizona. Pastor
7 Schwartz is the founder and head pastor of the Alliance as well as the founder of the Academia
8 de Capellania Llamados Para Servir (Academy of Chaplains Called to Serve), a nonprofit
9 organization.

10 3. Iglesia Alfa y Omega is a bilingual, non-denominational Christian church in
11 Phoenix, Arizona.

12 4. Elias Garcia is a resident of Phoenix, Arizona, and is the senior pastor of Iglesia
13 Alfa y Omega.

14 5. Iglesia Monte Vista is a bilingual, cross-cultural Christian church in Phoenix,
15 Arizona.

16 6. Angel Campos is a resident of Phoenix, Arizona, and is the senior pastor of
17 Iglesia Monte Vista.

18 7. Iglesia Nueva Esperanza is a bilingual, non-denominational Christian church in
19 Mesa, Arizona.

20 8. Israel Camacho is a resident of Mesa, Arizona, and is the senior pastor of Iglesia
21 Nueva Esperanza.

22 9. Iglesia Apostolica De La Comunidad is a Spanish-speaking, non-
23 denominational Christian church in Phoenix, Arizona.

24 10. Cristobal Perez is a resident of Phoenix, Arizona, and is the senior pastor of
25 Iglesia Apostolica De La Comunidad.

26 11. Helping With All My Heart, Inc. is an Arizona non-profit corporation.
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1 12. Pastor Perez is the executive director of Helping With All My Heart. Helping
2 With All My Heart serves the homeless, visits rehabilitation centers, and runs a food bank and
3 jail ministry.

4 13. Iglesia Cristiana El Buen Pastor is a Spanish-speaking, non-denominational
5 Christian church in Mesa, Arizona.

6 14. Hector Ramirez is a resident of Mesa, Arizona, and is the senior pastor of Iglesia
7 Cristiana El Buen Pastor.

8 15. Terence Driscoll is a resident of Phoenix, Arizona.

9 **Defendants**

10 1. Jeremy Bronaugh is a resident of Goodyear, Arizona.

11 2. Jennifer Harrison is a resident of Peoria, Arizona.

12 3. Eduardo Jaime is a resident of Phoenix, Arizona.

13 4. Michael Pavlock is a resident of Peoria, Arizona.

14 5. AZ Patriots is an unincorporated association based in Arizona. It was founded on
15 or about February 18, 2019, by Jeremy Bronaugh, Jennifer Harrison, Eduardo Jaime, and
16 Michael Pavlock, who were active members of Patriot Movement AZ until that point.

17 **Jurisdiction and Venue**

18 6. The subject matter and parties fall under this Court's jurisdiction under 28 U.S.C.
19 § 1331. The Court has jurisdiction over Plaintiffs' state law claims pursuant to 28 U.S.C.
20 § 1367. Venue is proper in this district pursuant to 28 U.S.C. § 1391(b).

21 **DEFINITIONS**

22 7. "Plaintiffs" refers to the individuals and entities described in paragraphs 1–15,
23 above.

24 8. "Consenting Defendants" refers to the individuals and entities described in
25 paragraphs 16–20, above.

26 9. "Parties" refers to the Plaintiffs and Consenting Defendants, collectively.
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1 **ORDER**

2 Accordingly, the Parties having freely given their consent, and the terms of the Consent
3 Decree being fair, reasonable, and consistent with the requirements of state and federal law,

4 **IT IS ORDERED** as follows:

- 5 1. The Joint Motion for Approval of Consent Judgment (Doc. 39) is granted.
6 2. Rather than engage in protracted litigation, the Parties agree to resolve this
7 matter through this Consent Decree.
8 3. Defendants are permanently enjoined and restrained from:

9 (A) trespassing on, standing, sitting, or lying on, or blocking, impeding, or
10 obstructing ingress or egress from any property or building owned or
11 regularly and consistently utilized by Plaintiffs, or directly encouraging
others to do the same;

12 (B) trespassing on, standing, sitting, or lying or being present in or on,
13 blocking, impeding, or obstructing ingress to or egress from any parking
14 lot, driveway, driveway entrance, or walkway entrance to any property or
building owned or regularly and consistently utilized by Plaintiffs, or
directly encouraging others to do the same;

15 (C) physically abusing, grabbing, touching, pushing, shoving, crowding,
16 or tortiously harassing persons entering or leaving, working at or using the
services of any property or building owned or regularly and consistently
utilized by Plaintiffs, or directly encouraging others to do the same;

17 (D) using any mechanical loudspeaker or sound amplification device,
18 including, but not limited to, megaphones, bullhorns, and electric
19 amplifiers, or making any excessively loud sound which injures, disturbs,
20 or endangers the health or safety of any person on any property or
building owned or regularly and consistently utilized by Plaintiffs, or
directly encouraging others to do the same;

21 (E) defacing, vandalizing, or damaging in any way any property or
22 building owned or regularly and consistently utilized by Plaintiffs, or
directly encouraging others to do the same;

23 (F) recording, filming, taping, or photographing by any means, including
24 but not limited to cameras or cell phones, any person on any property or
building owned or regularly and consistently utilized by Plaintiffs, or

“stating or implying” includes publishing, republishing, and failing to remove any previously published statement, by either Consenting Defendants or any third party, on any social media account which Consenting Defendants control. To ensure that Consenting Defendants

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