

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION (DAYTON)

THE CITY OF SPRINGFIELD, OHIO,
MAYOR ROB RUE, ASSISTANT MAYOR
DR. DAVID ESTROP, CITY
COMMISSIONERS KRYSTAL BROWN and
TRACEY TACKETT, and TAYLOR FLORA,
CASEY ROLLINS, JESSICA SHAFER, and
RANDALL COMER,

Plaintiffs,

v.

The BLOOD TRIBE, CHRISTOPHER
POHLHAUS, DRAKE BERENTZ, and
JOHN DOES 1–7,

Defendants.

Civil Action No. 3:25-cv-33

JURY TRIAL DEMANDED

COMPLAINT

The City of Springfield, Ohio (“Springfield” or the “City”), along with Springfield’s Mayor, Rob Rue, Springfield’s Assistant Mayor, Dr. David Estrop, Springfield City Commissioners Krystal Brown and Tracey Tackett, and Springfield residents Taylor Flora, Casey Rollins, Jessica Shafer and Randall Comer (with Plaintiffs Rue, Estrop, Brown, and Tackett, the “Individual Plaintiffs,” and with the City, “Plaintiffs”), bring this Complaint against the Blood Tribe, its leaders Christopher Pohlhaus and Drake Berentz, and certain unnamed John Does (“Defendants”), for engaging in, and inciting, a campaign of harassment and intimidation, motivated by ethnic and racial hatred, against those who supported Springfield’s Haitian community in the face of Defendants’ racist attacks. Plaintiffs, by their undersigned attorneys,

upon personal knowledge with respect to themselves and their actions and otherwise upon information and belief, allege as follows:

NATURE OF THE ACTION

1. In July 2024, members of a neo-Nazi group called the Blood Tribe coordinated a “hit” on the City of Springfield to stop a purported “invasion” by Haitian immigrants. Though the vast majority of the immigrants lawfully reside in the United States, and had been welcomed by the City, the Blood Tribe insisted that Haitians who settled in Springfield threatened “the good White residents” of Springfield.

2. On August 10, 2024, as the City celebrated its annual Jazz & Blues festival, Blood Tribe members descended on Springfield’s downtown, displaying guns, waving swastika flags, and wearing matching red shirts, black pants, and ski masks. Blood Tribe members pointed their guns at families attending the festival and yelled racial slurs.¹ They then made their way to City Hall where one of their leaders, Drake Berentz, delivered a racist and antisemitic rant, claiming that Springfield had been “taken over” and “giv[en] away to savage niggers.”² The Blood Tribe mob responded with chants of “Sieg Heil” and Nazi salutes.³ Blood Tribe members then bragged on social media about the chaos they had caused, warning that the “invasion” of Springfield by Haitian immigrants was a “crime” that would not “go unanswered” and promising “we will definitely be back.”

¹ According to a local source, the Blood Tribe pointed their rifles at the car of one family and yelled, “Get the f**k back to Africa.” See Kaitlyn Finchler, *Springfield Residents Concerned About City’s Response to People Marching with Rifles, Swastika Flags*, Cleveland Jewish News (Aug. 16, 2024), https://www.clevelandjewishnews.com/news/local_news/springfield-residents-concerned-about-citys-response-to-people-marching-with-rifles-swastika-flags/article_542512c6-5bde-11ef-971a-9394200c5101.html; see also Marshall Weiss, *Hate Parade In Springfield*, Dayton Jewish Observer (Aug. 22, 2024), <https://daytonjewishobserver.org/2024/08/hate-on-parade-in-springfield/>.

² In the interest of accuracy and to convey the hateful nature of Defendants’ actions, Plaintiffs have quoted their documents and statements verbatim.

³ See @Hammer, *Blutstamm Marches on Springfield Ohio In Response to NGO Funded Invasion of Haitian Savages*, odysee.com (posted on Aug. 18, 2024), <https://odysee.com/@Hammer:3e/SPRINGFIELD:8>.

3. Two weeks later, on August 24, 2024, the Blood Tribe returned to Springfield. Berentz directly threatened Springfield's leaders at a City Commission meeting, telling them that "if you keep importing Haitians, things will get worse," and ominously stating, "you've been warned."

4. The Blood Tribe made good on these threats. Soon thereafter, the City of Springfield and its residents received at least 33 bomb threats, the vast majority of which included complaints about Springfield's Haitian immigrants.⁴ Hospitals, clinics, elementary and middle schools, universities, private residences, and businesses received anonymous emails and telephone calls purporting to identify the location and detonation time of explosives in each of the respective facilities. Many City residents, including young school children, were forced to evacuate their buildings. And even though the bomb threats proved to be false alarms, they were frightening and disruptive and required the City of Springfield to expend extensive resources to assure the safety of the City and its residents.

5. The Blood Tribe then ramped up their intimidating and hateful conduct, targeting Springfield officials they claimed were "complicit" in the purported "invasion" of Haitian immigrants. On September 28, 2024, a dozen members of the Blood Tribe, led by Berentz, returned to Springfield, and congregated outside of Mayor Rue's home. Once again, they wore red shirts and black pants, covered their faces with masks, and carried swastika flags. After taunting the Mayor to "enjoy your peace for now," the mob headed to City Hall where Berentz announced that "Springfield is property of Blood Tribe" and that "we are ready to face

⁴ See Alicia Victoria Lozano & Kevin Collier, *Bomb Threat In Springfield Spurs Fear and Closures After False Anti-Migrant Claims*, NBC News (Sept. 12, 2024), <https://www.nbcnews.com/tech/security/bomb-threat-springfield-stokes-fear-false-claims-haitian-migrants-pets-rcna170856>; Phil Helsel, *More Than 30 Bomb Threats Made In Springfield, Ohio, After False Pets Claims*, NBC News (Sept. 16, 2024), <https://www.nbcnews.com/news/us-news/30-bomb-threats-made-springfield-ohio-false-pets-claims-rcna171392>.

the enemies of the American people in the streets, until the problem is dealt with.” The Blood Tribe then celebrated and ratified their hateful conduct on social media, bragging about their visit to the Mayor’s home and calling it a “[b]usy weekend for the Tribe.”

6. The Blood Tribe also identified Springfield residents who supported the Haitian community and set out to terrorize and intimidate them. The Blood Tribe sent suspicious packages designed to look like bombs, left harassing voicemails, sent hateful emails, demeaned the residents and their families on social media platforms, used dating apps to send men looking for drugs and sex to their homes late at night, and publicized their personal information, such as their telephone numbers, email addresses, and home and work addresses, all the while actively encouraging others to harass and intimidate them.

7. Plaintiffs bring this action to hold the Blood Tribe, and its leadership, members and associates, accountable for their campaign of hate and harassment. They bring claims for: (1) interfering with Plaintiffs’ civil rights; (2) creating a public nuisance; (3) Ohio Code violations of telecommunications harassment, ethnic intimidation, menacing, and inciting violence; and (4) intentionally inflicting emotional distress through their extreme and outrageous hate-based conduct.

THE PARTIES

Plaintiffs

8. The City of Springfield is a municipal corporation located in Southwest Ohio. It was founded in 1801 and became the seat of Clark County in 1818.

9. Springfield is an historic manufacturing hub. It has been the home of international manufacturing companies such as International Harvester, Champion Farm Equipment, and the Crowell-Collier Publishing Company.

10. At the turn of the century, Springfield's population started to decline, and the City faced economic challenges. Beginning around the same time, the City also began to see increases in immigration, with thousands moving to the City looking for work and a safe place to live. In the last decade, for example, more than 10,000 immigrants who fled political violence in the Republic of Haiti have settled in Springfield, the vast majority of whom received temporary protected status, allowing them to live and work in the United States without fear of deportation.

11. The City of Springfield is governed by a City Commission composed of five members, including the Mayor, all of whom are elected at-large. Each member of the Commission, including the Mayor, serves a four-year term. The Springfield City School District ("SCSD") serves approximately 7,700 students across 17 buildings. Springfield is also home to two hospitals—Mercy Health and Kettering Health—and several government buildings including City Hall.

12. Rob Rue serves as the Mayor of Springfield. He was first elected to the City Commission in 2017 and was re-elected in 2021. He was elected separately as Mayor, in accordance with the City Charter, in 2023, for a term of four years.

13. In 2024, Rue received multiple bomb threats. On one occasion, a dozen Blood Tribe members and associates, dressed in black hoods and waving Nazi flags, converged on Rue's home.

14. Assistant Mayor Dr. David Estrop, Krystal Brown, and Tracey Tackett serve alongside Rue as City Commissioners. Each has been threatened by the Blood Tribe for supporting Springfield's Haitian community. They have been named in bomb threats and have had their lives threatened.

15. Taylor Flora lives in Springfield and works at Clark State Community College (“Clark State”) serving as its only grant development professional. She has obtained grants to strengthen Clark State’s English as a Second Language (“ESL”) programs, which help foreign language speakers, including many Haitian residents, learn to speak and write in English.

16. At a City Commission meeting on August 27, 2024, Flora warned the City Commissioners that Berentz, a leader of the Blood Tribe who spoke at the meeting, was “a Nazi” and should not be given a platform. The next day, Blood Tribe members began a weeks-long intimidation campaign against Flora, harassing her both online and in person. Among other things, the Blood Tribe “doxed” her, publishing her personal information online, including her home address and telephone numbers, while expressly encouraging its followers to send harassing and threatening messages; soliciting men on a dating website to go to Flora’s home in the middle of the night to seek drugs and sex; and sending a suspicious package to her home designed to appear as a bomb that contained a warning note from the Blood Tribe.

17. Jessica Shafer is a social worker who lives in Springfield, supervises several therapists in Clark County, and teaches social work at Clark State. Through her work, Shafer has become an advocate for the Haitian community.

18. Shafer also was targeted by the Blood Tribe after she spoke out in support of the Haitian community at City Commission meetings. Among other things, the Blood Tribe posted numerous disparaging remarks about Shafer on social media, calling her, among other things, an “enemy combatant.” They also “doxed” her, publishing her personal information online, including her home address and telephone numbers, as well as the location and a photograph of her place of employment, while expressly encouraging Blood Tribe followers to send harassing and threatening messages. And, on multiple occasions, the Blood Tribe followers

solicited men on a dating website to go to Shafer's home in the middle of the night to seek drugs and sex.

19. Casey Rollins is the Executive Director of the Springfield District Council of St. Vincent de Paul, a Catholic charitable organization that, among other things, helps immigrants get work permits, apply for asylum, and obtain other assistance.

20. The Blood Tribe has attacked Rollins on social media, and "doxed" her, publishing her personal information online, including her home address and telephone numbers, while expressly encouraging its followers to send harassing and threatening messages. She has received hateful messages calling her a "N— lover" and demanding that she "stop encouraging the migration to Springfield." An email address of Rollins's was hacked, and the hacker used that email address to send a bomb threat.

21. Randall Comer is a lifelong resident of Springfield. The Blood Tribe "doxed" Comer after he spoke favorably about the Haitian residents at a City Commission meeting in September 2024, referring to Haitian immigrants as "neighbors" and espousing Christian values involving welcoming foreigners. The Blood Tribe vowed to make Comer's professional career "miserable," calling him a "traitor" to the Blood Tribe's cause and posting photographs of Comer's home, place of employment, and wife on social media. The Blood Tribe followers solicited a man on a dating website to go to Comer's home in the middle of the night apparently seeking sex.

22. The Blood Tribe's extreme, outrageous, and malicious conduct intentionally and proximately caused Plaintiffs Rue, Estrop, Brown, Tackett, Flora, Rollins, Shafer, and Comer, serious emotional anguish.

Defendants

23. The Blood Tribe is a white supremacist organization,⁵ founded by Pohlhaus and led by Pohlhaus and Berentz. It is a membership organization that claims seven regional chapters in the United States and two in Canada.⁶ It holds rallies where members carry the swastika banner, give the Nazi salute and shout the Nazi chant, “Sieg Heil!”⁷ Blood Tribe leadership recruits members, assesses membership dues, charges fees for participating in events, solicits donations, and sells Nazi-themed merchandise, including the black pants, red shirts, and hoods that comprise the Blood Tribe’s uniform.

24. The Blood Tribe’s ideology is based on a white supremacist belief system with roots in Nazism. It styles itself as the future leadership of the “Aryan” race, claims to act in “defense” of the coming “extinction” of the “Aryan race,” and seeks to establish “future Kings that will swear fealty to our Volk” and the “elimination of all anti-White racial hostility.”⁸ The Blood Tribe states that it “despise[s] jew[s] . . . niggers and all non Whites [sic]”⁹ and members of the LGBTQ+ community.¹⁰ It seeks a white ethnostate, which entails “[t]he removal of all nonwhite and non racially loyal elements from our society.”¹¹

⁵ Blood Tribe (@BloodTribe), Gab.com (Dec. 15, 2023), <https://gab.com/BloodTribe/posts/111584497231017686> (“everything not explicitly National Socialist is doomed to fail.”); Blood Tribe (@BloodTribe), Gab.com, (Jan. 19, 2024), <https://gab.com/BloodTribe/posts/111785397296615469> (“We are Nazis We are White supremacists We are White Ethno Nationalists [sic]”).

⁶ ADL Center on Extremism, *The Blood Tribe*, adl.org, <https://www.adl.org/resources/background/blood-tribe>.

⁷ Christopher Pohlhaus (HAMMER), *BLUTSTAMM MARCHES ON HARRISBURG PA AUG/24/2024*, <https://odysee.com/@Hammer:3e/HARRISBURG:a> from 1:54; Blood Tribe (@BloodTribe), Gab.com (Jan. 26, 2024), <https://gab.com/BloodTribe/posts/111822654200083655>.

⁸ Christopher Pohlhaus (HAMMER), *HERZOG HIGGER’S AND HAMMER’S END OF YEAR SPEECHES*, odysee.com (Nov. 20, 2023), <https://odysee.com/@Hammer:3e/Yearendspeech:a> 9:00 to 13:00.

⁹ Blood Tribe (@BloodTribe), Gab.com, (Jan. 19, 2024), <https://gab.com/BloodTribe/posts/111785397296615469>.

¹⁰ See Blood Tribe (@BloodTribe), Gab.com (Sept. 30, 2024), <https://gab.com/BloodTribe/posts/113226744870822081>; FNTV, *Neo-Nazis, White Lives Matter and Proud Boys Protest Drag Story Hour event in Wadsworth Ohio*, Youtube.com (Mar. 16, 2023), <https://www.youtube.com/watch?v=moxzSxwwmio>.

¹¹ Drake Berentz (@higgers_nj), x.com (Nov. 29, 2024 at 12:46 p.m.), https://x.com/higgers_nj/status/1862553664629477481.

25. The Blood Tribe began monitoring Springfield in 2023,¹² and began its campaign of threats and harassment there in the summer of 2024.

Individual Defendants

26. Christopher Pohlhaus, who also goes by the names “Hammer,” “Blutkönig,” and “The Blood King,” is the founder of the Blood Tribe.¹³ Pohlhaus was incensed by the arrival of Haitian immigrants in Springfield and has repeatedly encouraged Blood Tribe members and associates to “hit” Springfield. In September 2024, Pohlhaus posted on social media that “[o]ur boots are literally on the ground [in Springfield] every week,” “[w]e have a network of local informants,” “have marched there under the Swastika and . . . will continue to do so.” As he boasted to his followers, “[w]e put Springfield in the public consciousness.”

27. Drake Berentz, who also uses the thinly veiled racist names “Nate Higgers” and “Herzog Higgers,” is a leader of the Blood Tribe and coordinated the Blood Tribe’s activity in Springfield. Berentz led the August 10, 2024 armed foray into Springfield during its Jazz and Blues festival, threatened the Mayor and Commissioners at the August 27, 2024 City Commission meeting, and led the September 28, 2024 confrontation of Mayor Rue and his family at their home. He has threatened Springfield, its officials, and its residents with violence and has participated in the public dissemination of Shafer’s personal information.

28. John Doe 1 is an associate of the Blood Tribe who left voicemails threatening Flora with violence on August 31, 2024, September 1, 2024, and September 4, 2024.

¹² Blood Tribe (@BloodTribe), Gab.com (Sept. 12, 2024), <https://gab.com/BloodTribe/posts/113126490166940197> (“. . . we have had our eye on Springfield for over a year . . .”).

¹³ See Drew F. Lawrence & Konstantin Toropin, *Neo-Nazi Group Led by 2 Ex-Marines Pushed and Cheered Haitian Pet-Eating Claims Gripping Ohio City*, Military.com (Sept. 17, 2024), <https://www.military.com/daily-news/2024/09/17/neo-nazi-group-led-2-ex-marines-pushed-and-cheered-haitian-pet-eating-claims-gripping-ohio-city.html>.

29. John Doe 2 is an associate of the Blood Tribe who sent a package to Flora's home on or about September 11, 2024, causing her to believe that she had received a bomb.

30. John Doe 3 is an associate of the Blood Tribe who sent threatening email messages to Flora in September and October 2024 which caused her to fear she would be subjected to violence.

31. John Doe 4 is an associate of the Blood Tribe who caused men to come to Flora's home at night under the false impression that Flora had invited them to take drugs and have sex.

32. John Doe 5 is an associate of the Blood Tribe who caused men to come to Shafer's home at night under the false impression that Shafer had invited them to take drugs and have sex.

33. John Doe 6 (a/k/a "Andy") is an associate of the Blood Tribe who caused a man to come to Comer's home at night under the false impression that he was invited to meet with John Doe 6.

34. John Doe 7 (a/k/a "Andail Chanter") is an associate of the Blood Tribe who amplified Pohlhaus's messages by calling for Blood Tribe members to "hit" Springfield.

JURISDICTION AND VENUE

35. This Court has subject matter jurisdiction over Plaintiffs' federal claims, pursuant to 28 U.S.C. §§ 1331 and 1337, because Plaintiffs raise claims that arise under the laws of the United States.

36. This Court also has supplemental jurisdiction, pursuant to 28 U.S.C. § 1367, to hear and decide claims under the Constitution and the laws of the State of Ohio that arise from the same nucleus of operative facts as Plaintiffs' federal claims.

37. This Court has *in personam* jurisdiction over the Blood Tribe because the conduct described herein took place substantially in, and was intentionally directed towards, the residents of Springfield.

38. This Court has *in personam* jurisdiction over Christopher Pohlhaus because the conduct described herein took place substantially in Springfield, and was intentionally directed towards the residents of Springfield. As Pohlhaus stated, “Our boots are literally on the ground [in Springfield] every week. We [Blood Tribe] are local. We have a network of local informants. We have marched there under the Swastika and we will continue to do so.” Pohlhaus also ordered the Blood Tribe and its followers to “hit Springfield.”

39. This Court has *in personam* jurisdiction over Drake Berentz because the conduct described herein took place substantially in, and was intentionally directed towards the residents of, Springfield. Berentz came to Springfield repeatedly to harass, intimidate, and threaten City officials and residents who supported the Haitian community.

40. This Court has *in personam* jurisdiction over John Does 1–7 because the conduct described herein took place substantially in Springfield, and was intentionally directed towards the residents of Springfield.

41. Venue is proper in the Southern District of Ohio because a substantial part of the events, or omissions, giving rise to Plaintiffs’ claims occurred in the Southern District of Ohio.

FACTUAL ALLEGATIONS

Springfield Sees an Increase in Haitian Immigrants

42. For much of the 20th century, Springfield served as a manufacturing hub and was home to many companies that manufactured metal, farming equipment, food and beverages, and other products sold throughout the United States and abroad.

43. In recent decades, manufacturing jobs in Springfield became scarcer and Springfield began to experience economic challenges. Springfield's population declined from approximately 80,000 residents in the 1970s, to approximately 60,000 in 2015.¹⁴ Median incomes in Springfield fell 27% between 1999 and 2014.¹⁵

44. In recent years, Springfield has seen an increase in newly arrived, lawful immigrants to the United States.¹⁶ Many came from the Republic of Haiti, a country that has been engulfed by political turmoil for decades, and had secured Temporary Protected Status, allowing them to live and work lawfully in the United States.

45. With more than 10,000 new residents, employers brought new businesses to Springfield and expanded existing businesses.¹⁷ Employers in Springfield have praised the work ethic of their new Haitian employees, reporting that “[t]hey come to work every day. They don’t cause drama. They’re on time.”¹⁸

The “Blood Tribe”

46. The “Blood Tribe,” also called “Blutstamm,” is a neo-Nazi group founded by Pohlhaus. Pohlhaus has attempted to cultivate an online following for his group by exhorting

¹⁴ See Miriam Jordan, *Why Thousands of Haitians Have Settled in Springfield, Ohio*, N.Y. Times (Sept. 14, 2024), <https://www.nytimes.com/2024/09/14/us/haitian-migrants-springfield-ohio.html>.

¹⁵ See Uri Berliner, *Springfield, Ohio: A Shrinking City Faces a Tough Economic Future*, NPR (Sept. 19, 2016), <https://www.npr.org/2016/09/19/493920060/springfield-ohio-a-shrinking-city-faces-a-tough-economic-future>.

¹⁶ See *Making Springfield an Immigrant-Friendly City: WYSO's Lewis Wallace Talks to Carl Ruby*, 91.3 WYSO (Feb. 20, 2014), <https://www.wyso.org/news/2014-02-20/making-springfield-an-immigrant-friendly-city-wyso-lewis-wallace-talks-to-carl-ruby>; Michael Cooper, *Springfield Seeks to be Immigrant Friendly City*, Springfield News-Sun (July 27, 2014), <https://www.springfieldnewssun.com/news/local-govt--politics/springfield-seeks-immigrant-friendly-city/YmnFF8Gu14p1h79QeWRBZL>.

¹⁷ See Miriam Jordan, *How an Ohio Town Landed in the Middle of the Immigration Debate*, N.Y. Times (Sept. 3, 2024), <https://www.nytimes.com/2024/09/03/us/springfield-ohio-school-bus-crash-haiti-immigrants.html>.

¹⁸ See *id.*; see also Miriam Jordan, *An Ohio Businessman Faces Death Threats for Praising His Haitian Workers*, N.Y. Times (Sept. 30, 2024), <https://www.nytimes.com/2024/09/30/us/springfield-ohio-haitians-threats.html#>.

“Aryan” men to participate in a “last stand, a righteous war” against non-Whites who, he claims, “call for the destruction of their birthright and posterity.”¹⁹

47. In 2021, Pohlhaus began referring to his followers as the “Blood Tribe.” He transformed the group into a membership-based, hierarchical organization, with himself as the leader.²⁰ The Blood Tribe’s goals include normalizing the swastika, and building a white ethnostate in the United States that is controlled by “Aryans.” Pohlhaus and other Blood Tribe members idolize Adolf Hitler, believing he was a reincarnation of the Norse god Odin (or “Wotan”).



Christopher Pohlhaus

21

48. Pohlhaus led the Blood Tribe in its first action in March 2023, when they disrupted an LGBTQ-focused event in Wadsworth, Ohio. The group wore matching red attire, brandished swastikas and displayed a banner reading, “There will be blood.” The Blood Tribe

¹⁹ See ADL Center on Extremism, *supra* note 6.

²⁰ See *id.*

²¹ See *id.*

subsequently showed up in numerous states throughout the United States, including in Wisconsin, Florida, Tennessee, South Dakota, and Pennsylvania, chanting slogans, such as:

“All hail the new dawn of the Aryan sun”

“There will be blood”

“Deportation saves the nation”

“Heil Hitler”

“White power”

“Jews will not replace us”

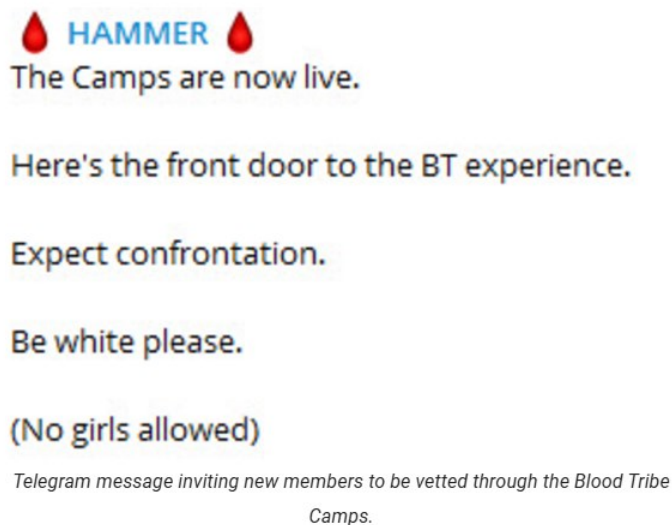
“Stand with us or stand with pedophiles . . . Pedophiles get the rope”²²

“Access to white people is not a human right”

49. The Blood Tribe refers to itself as an “end of the pipeline type group” and rejects other, less “hardcore” white supremacist groups that forgo explicit neo-Nazi symbols, believing those groups are “weak and effeminate.”

50. The Blood Tribe recruits members on social media through a process it refers to as “The Camps,” in which applicants are aggressively hazed to weed out “fragile people.” One of Pohlhaus’ posts states:

²² Specifically referring to LGBTQ+ people.



51. Following the vetting process of the Camps, Blood Tribe applicants progress through various membership levels, until they reach “Blut Stamm,” German for “Blood Tribe.” Once accepted as members, they undergo an initiation ritual during which they cut themselves using the Blood Tribe’s ceremonial spear, symbolically joining their blood bond with that of the “Tribe.”

52. The Blood Tribe attempts to raise money through crowdfunding websites, cryptocurrency donations, membership fees and dues, and book and merchandise sales.²³

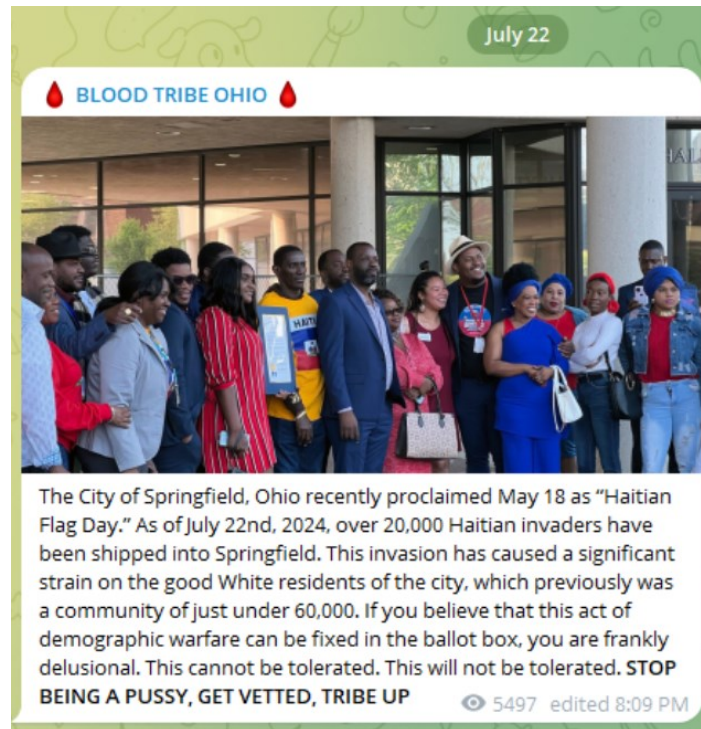
The Blood Tribe Launches a Hate-Based Campaign Targeting Springfield and Its Residents

53. While Springfield welcomed its new Haitian neighbors, the Blood Tribe noticed the growing population of immigrants and became enraged. Blood Tribe leaders, including Pohlhaus, Berentz, and John Doe 7, “Andail Chanter,” plotted to upend the City’s program of peacefully integrating its Haitian residents.

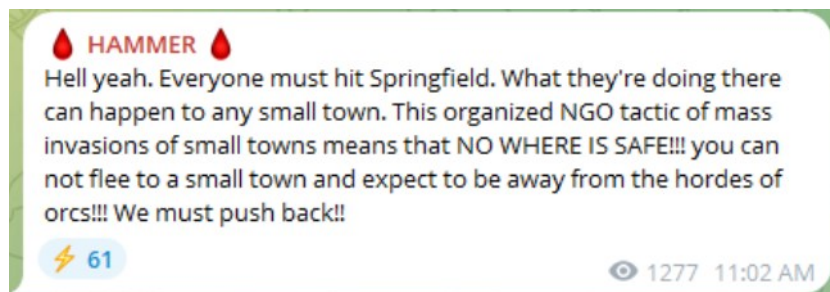
54. In July 2024, the Blood Tribe issued a call to action:

²³ See *Christian Fundraising Site Platforms Neo-Nazi Raising Funds to Build ‘All-White’ Town*, Jerusalem Post (Mar. 25, 2023), <https://www.jpost.com/diaspora/antisemitism/article-735341>; Jeff Tischauser, *Neo-Nazi Ex-Marine Buys Up Land in Rural Maine for ‘Blood Tribe’*, Southern Poverty Law Center (July 27, 2023), <https://www.splcenter.org/hatewatch/2023/07/27/neo-nazi-ex-marine-buys-land-rural-maine-blood-tribe>.

As of July 22nd, 2024, over 20,000 Haitian invaders have been shipped into Springfield. This has caused a significant strain on the good White residents of the city . . . If you believe this act of demographic warfare can be fixed in the ballot box, you are frankly delusional. This cannot be tolerated. This will not be tolerated. **STOP BEING A PUSSY, GET VETTED, TRIBE UP.**

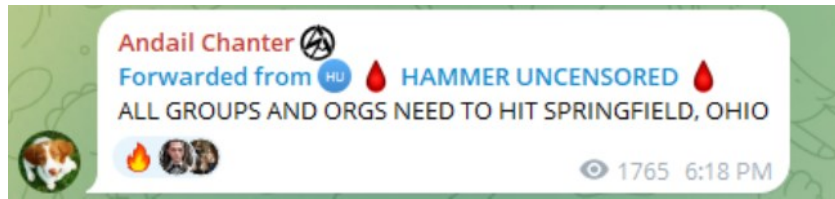


55. Pohlhaus ordered the Blood Tribe and its followers to “hit Springfield,” insisting that the “mass invasions of small towns means NOWHERE IS SAFE!!! you can not flee to a small town and expect to be away from the hordes of orcs!!!”²⁴



²⁴ “Orcs” – Pohlhaus’s description of Haitian immigrants – are a “loathsome, ugly, cruel, feared, and especially terminable . . . inhuman creatures” in J.R.R. Tolkien’s popular book series, “Lord of the Rings.” Robert T. Tally Jr., *Let Us Now Praise Famous Orcs: Simple Humanity in Tolkien’s Inhuman Creatures*, 29:1/2 *Mythlore* 17 (2010). Tolkien’s presentation of Orcs suggests to a reader that “the only good Orc is a dead Orc.” *Id.*

56. John Doe 7 forwarded Pohlhaus's message to his associates, and reiterated the call to action, stating: "ALL GROUPS AND ORGS NEED TO HIT SPRINGFIELD, OHIO."



57. Members of the Blood Tribe heeded the call. Over the next few months, the Blood Tribe and its members and associates unleashed a torrent of hateful conduct, including acts of harassment, bomb threats, and death threats, against Springfield residents who spoke out in support of the Haitian community.

58. The Blood Tribe's first "hit" on Springfield came on August 10, 2024, the second day of the City's annual Jazz and Blues festival.

59. At about 4:35 p.m., a U-Haul truck approached City Hall and unloaded a dozen Blood Tribe members, each wearing black and red uniforms with masks to hide their identities. Two carried assault rifles and others waved black flags emblazoned with Nazi swastikas. Only Berentz, the leader of the attack and the Blood Tribe's second-in-command, was unmasked. The group filmed its activities to use later in propaganda and recruitment efforts, to incite its members and stoke more hatred against Springfield.



60. Seeking to intimidate as many residents as possible, the Blood Tribe headed to downtown Springfield where hundreds of people had come to enjoy the Jazz and Blues festival. The group chanted threatening slogans, including, “[w]e hear you have a Haitian problem, we’re here to help.”

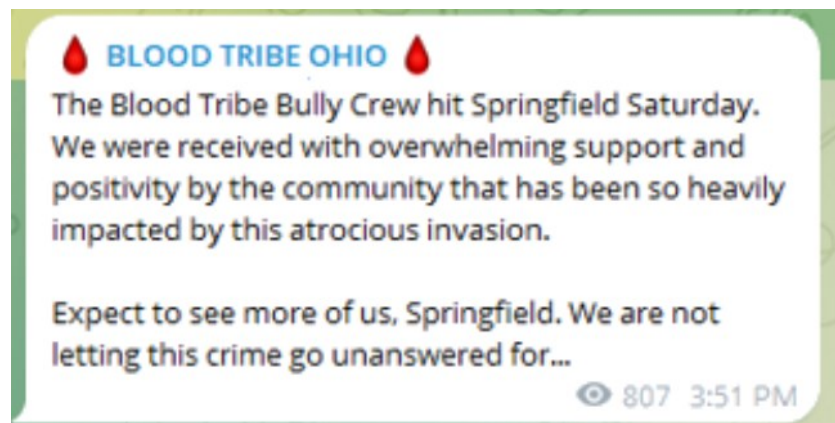
61. Residents tried to keep their distance from the racist mob, but some could not avoid their path. One family ran to their car and attempted to leave the scene when the Blood Tribe approached them. The mob yelled racist slurs (including “go the fuck back to Africa”) and aimed assault rifles at the terrified family as they hid in their car.²⁵

62. Dr. Estrop found the Blood Tribe’s use of the swastika to be particularly triggering. Dr. Estrop’s father served in the U.S. Army under General George S. Patton and was one of the American servicemen who liberated the Dachau concentration camp in 1945.

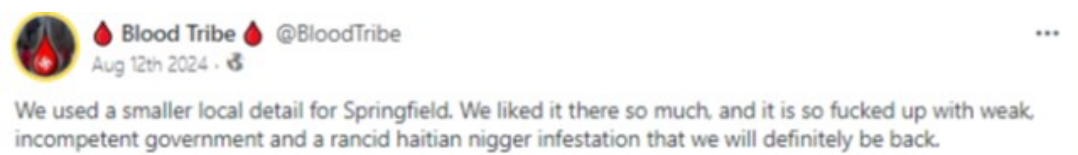
²⁵ See Marshall Weiss, *Hate on Parade in Springfield*, Dayton Jewish Observer (Aug. 22, 2024), <https://daytonjewishobserver.org/2024/08/hate-on-parade-in-springfield/>.

63. After the confrontation, the Blood Tribe bragged about and ratified their exploits on social media and threatened that they would return, to continue their plan to intimidate the City and its residents.

64. Under a post headlined: “The Blood Tribe Bully Crew hit Springfield Saturday,” the Blood Tribe warned: “Expect to see more of us, Springfield. We are not letting this crime go unanswered for.”



65. In another social media post, the Blood Tribe bragged: “We used a smaller local detail for Springfield. We liked it there so much, and it is so fucked up with weak, incompetent government and a rancid haitian nigger infestation that we will definitely be back.”



66. The Blood Tribe “hit” Springfield again on August 27, 2024, during a City Commission meeting. Arriving in a black BMW with three uniformed Blood Tribe members, Berentz entered the meeting and approached the podium to speak. He started by identifying himself using a thinly-veiled racial epithet as a pseudonym: “Nathaniel Higgers of Blood Tribe.”

67. Berentz bragged that he led the anti-Haitian disruption on August 10, 2024, during the City’s Jazz and Blues Festival.

68. Some attendees, including Flora, recognized Berentz and understood that Berentz and the Blood Tribe represented a virulent form of hate and presented a direct threat to the City and its residents. As she walked out of the meeting, Flora warned the Commissioners that Berentz was “a Nazi” and urged them not to listen to him.

69. Berentz continued to threaten and berate the Commissioners. He stated that he had “come to bring a word of warning,” that the Commissioners must “stop what you’re doing before it’s too late,” and threatening that “crime and savagery will only increase with every Haitian you bring in, and with it, public frustration and anger.”²⁶

70. As Berentz continued his rant, the Commissioners realized that Berentz and his Blood Tribe gang represented an imminent threat to their safety, and the safety of the City. Katie Eviston, Springfield’s Director of Finance, fearing an altercation, removed her high heeled shoes so that she could be ready to run.

71. Rue asked Berentz to leave because his statements were threatening. Berentz ignored him, continuing to speak until he was escorted from the podium.

The City Is Inundated with Violent Threats, Harassment and Intimidation

72. On September 5, 2024, a message on X (formerly known as Twitter) falsely claimed that Haitians in Springfield had kidnapped and butchered a neighbor’s cat.²⁷ The post also claimed that Haitians were “doing this to dogs . . . ducks & geese.”

²⁶ See Springfield City Commission Meeting (Sept. 24, 2024), at 1:23:58–1:25:21 <https://www.youtube.com/watch?v=VL4JXoFcJQI>.

²⁷ See Emily Chang, *Timeline of Unsubstantiated Claims About Haitian Immigrants in Springfield, Ohio*, ABC News (Sept. 13, 2024), <https://abcnews.go.com/Politics/timeline-unsubstantiated-claims-haitian-immigrants-ohio/story?id=113641302>.



73. Within a week, the post went viral, and its message reached hundreds of millions of viewers. Over the next month, the false rumor continued to spread, reaching a worldwide audience.

74. Pohlhaus gleefully took credit for the growing notoriety of these false claims, bragging on social media that the Blood Tribe had “pushed Springfield into the public consciousness.” Other Blood Tribe members agreed, adding that “[t]his is what real power looks like.”²⁸

75. As the baseless rumors spread, so, too, did the real-world consequences. Over the course of the next week, Springfield received at least 33 bomb threats, forcing multiple evacuations.

²⁸ See Brandy Zadrozny, *Before Trump, Neo-Nazis Pushed False Claims About Haitians as Part of Hate Campaign*, NBC News (Sept. 13, 2024), <https://www.nbcnews.com/tech/internet/trump-neo-nazis-pushed-false-claims-haitians-part-hate-campaign-rcna170796>.

76. On Thursday, September 12, 2024, the City received a bomb threat that threatened the City Commissioners and others by name:

and we shouldn't be taking in these people especially at these numbers. Our country is going to shit and I'm not going to stand idly by as you turn our country into a third world authoritarian shithole and I rather die than watch my country collapse. Fuck the entire biden administration, the democrat party, most republicans, Tracey Trackett, Rob Rue, Dave Estrop, Bridget Houston, Krystal Phillips, Regina Jeffers, Bryan Heckm Tom Franzen, Jason Via, Karen Graves, Juli Springerm Reggie Troutman, Logan Cobbs, Steve Thompson, Kimberly Fultz, Vaidehe Agwan, Brandon Gill and all the rest of you fuckers. I will kill you, I know where you live.

My hometown of Springfield is becoming a thirdworld shithole because you allowed the federal government to dump these fuckers here. We have people dying because the DMV is giving people who can't even drive driver's licenses. We have Haitians eating our animals and then you lie and claim this is not happening when we see this happening. I'm here to send a message, I placed a bomb in the following locations:

Springfield City Hall
Springfield Driver Exam Station
Ohio License Bureau Southside
Springfield Academy-Excellence
Fulton Elementary School

The bombs will detonate within an hour or 2. These are homemade pressure cooker and pipebombs, they will be detonated remotely. They are not powerful enough to bring the buildings down but they'll likely cause structural damage and kill anyone inside. Evacuate now.

77. As a result of the bomb threat, Springfield was forced to evacuate its City Hall, the Bureau of Motor Vehicles, the Springfield Driver's Exam Station, the Ohio License Bureau Southside, Springfield Academy of Excellence and Fulton Elementary School.²⁹

78. The next day, Friday, September 13, two more Springfield schools were forced to evacuate and a third was closed due to bomb threats they received.³⁰

79. On the same day, Springfield received bomb threats listing City Commissioner's home addresses. The threat read, "Bombs will detonate within an hour or two.

²⁹ See Kaitlin Schroeder, *More Bomb Threats Again Close Several Springfield Buildings, Schools Evacuated*, 91.3 WYSO (Sept. 13, 2024), <https://www.wyso.org/news/2024-09-13/several-springfield-schools-evacuated-and-dismissed-citing-police-information>.

³⁰ See Joshua Richardson, *Springfield Schools Evacuated Two Buildings Friday Morning; Middle School Closed*, ABC 6 (Sept. 13, 2024), <https://abc6onyourside.com/news/local/springfield-schools-evacuated-two-buildings-friday-morning-middle-school-closed>; see also Brooke Spurlock & Jessica Orozco, *Springfield Mayor Seeks 'Help Not Hate' as More Bomb Threats Close Schools, Offices*, Springfield News-Sun (Sept. 13, 2024), <https://www.springfieldnewssun.com/news/two-springfield-schools-evacuated-another-closed-district-cites-police-info/K26FV7URSVGPTB2IUPSFJCGUDM/>.

You fuckers are destroying our city, fuck you and fuck the Haitians. . . You will die a traitor's death, evacuate the surrounding areas so nobody else dies."

We placed bombs your homes, we will kill you:

Robert Rue [REDACTED]
[REDACTED]

Dave Estrop [REDACTED]

Kimberly Jean Fultz [REDACTED]

Bombs will detonate within an hour or two. You fuckers are destroying our city, fuck you and fuck the Haitians. The city government is ridiculously corrupt, you are willing to let these fuckers destroy our city to enrich yourselves. You will die a traitor's death, evacuate the surrounding areas so nobody else dies.

80. On Saturday, September 14, two hospitals were forced into lockdown due to bomb threats.³¹

81. On Sunday, September 15, Springfield's Wittenberg University announced it would be closing its campus due to a shooting threat it received over the weekend.³² Springfield's Community College, Clark State, announced it would be closing all of its campuses for the following week because of bomb and shooting threats.³³

82. On Monday, September 16, two more Springfield schools were forced to evacuate due to new bomb threats.³⁴

83. On Thursday, September 19, several other City Commissioners received vile bomb and death threats listing their home addresses. The threats read: "We will kill all the

³¹ See Dayton 24/7 Now Staff, *Bomb Threats Lock Down Two Springfield Hospitals; Lockdowns Now Lifted*, ABC 6 (Sept. 15, 2024), <https://www.abc6onyourside.com/news/local/bomb-threats-lock-down-two-springfield-hospitals-lockdowns-now-lifted>.

³² See Bob Vitale, *Wittenberg U Going Online Only Monday, Clark State Online All Week Over Springfield Threats*, The Columbus Dispatch (Sept. 15, 2024), <https://www.dispatch.com/story/news/local/2024/09/15/events-canceled-at-wittenberg-u-springfield-campus-sunday-due-to-haitian-threats/75237272007/>.

³³ See *id.*

³⁴ See Joshua Richardson, *Two More Springfield Schools Evacuated due to Bomb Threats*, ABC 6 (Sept. 16, 2024), <https://www.abc6onyourside.com/news/local/two-more-springfield-schools-evacuated-due-to-bomb-threats>.

city council members for their betrayal of their community. You are all worthless pieces of chicken shit. You will die. We placed bombs in the homes of the following people.”

rise, which they are. We will kill all the city council members for their betrayal of their community. You are all worthless pieces of chicken shit. You will die.

We placed bombs in the homes of the following people:

Bryan Heck [REDACTED]

Rob Rue [REDACTED]

Chrystal Phillips [REDACTED]

Dave Estrop [REDACTED]

84. Also on Thursday, September 19, the attackers targeted commercial enterprises around Springfield, including two Walmart stores, Kroger, and three hotels, and also launched another threat at Clark State.

We placed bombs in the following locations. Detonation begins soon

[2100 N Bechtle Ave, Springfield, OH 45504](#)

[2728 E Main St, Springfield, OH 45503](#)

[570 E Leffel Ln, Springfield, OH 45505](#)

[200 S Tuttle Rd, Springfield, OH 45505](#)

Bombs have been placed in these hotel rooms

Hampton Inn Springfield

Holiday Inn Express & Suites Springfield - Dayton Area, an IHG Hotel

Courtyard Springfield Downtown

85. On September 22, Clark State and Wittenberg University received more threats, with one complaining about “Haitian monkeys coming up from Florida & invading our city,” and warning that the sender would “shoot as many as I possibly can,” because “they’ve got cats and dogs in [their restaurants] and I will save them”:

I live @ [REDACTED] I am sick and goddamn tired of all these Haitian monkeys coming up from Florida & invading our city. I'm gonna go out tonight and shoot as many as I possibly can. I shall target their monkey restaurants in particular. I know they've got cats and dogs in there and I will save them

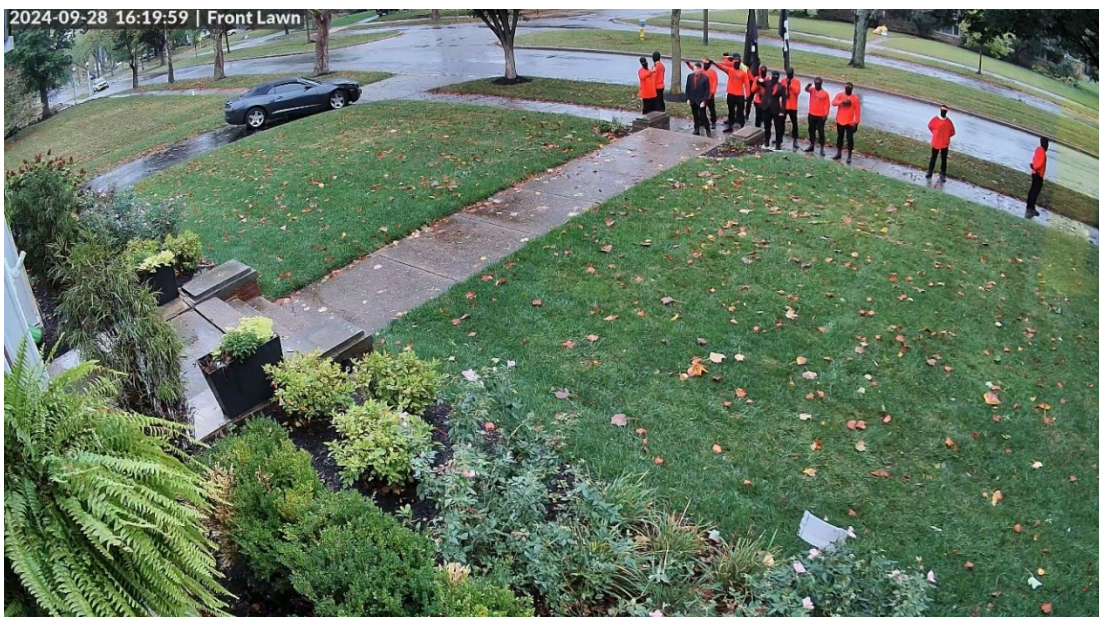
86. On September 24, the City Health Department received a threat of a terrorist attack:

All the Haitian invaders shall pay. They are savage niggers. Fuck em all and fuck you too. I will carry out a terrorist attack soon!

Harassment and Intimidation of Mayor Rue

87. Defendants have targeted Rue with physical intimidation and threats of violence.

88. On September 28, 2024, Berentz and about a dozen Blood Tribe members, wearing red shirts, black clothes, and black facemasks and holding swastika flags, gathered outside of Rue's home. The men warned Rue to "enjoy your peace now, until we come back." Fearing for his safety and that of his family, Rue had his shotgun loaded and by the front door of his home in case he needed to protect his family.



89. The Blood Tribe bragged about this on social media, writing: "Busy weekend for the Tribe. We paid another official visit to our beloved Springfield, and Mayor Rue's house in particular – and no, we weren't singing Christmas carols. We also crashed a fag

event near Columbus and caused lots of crying and emotional meltdowns. More details to follow . . .”

90. On another occasion, the Blood Tribe brought a Haitian man to Rue’s home and claimed the man “needs a place to stay.”

91. Based upon these and other incidents, Springfield, at substantial expense, has increased the security for Rue and others close to him.

Harassment and Intimidation of Springfield’s Commissioners

92. Springfield City Commissioners have been the target of threats from the Blood Tribe or those incited by the Blood Tribe. As noted earlier, the bomb threat on September 12 mentioned each Commissioner by name, and included the chilling message, “I will kill you, I know where you live.”

93. Tackett’s personal information was posted on X (formerly known as Twitter), and she received numerous threats and hateful messages to her email and on social media. Her inbox has been so flooded with cruel and threatening emails that she records them in a “Haters” folder.

94. Tackett’s mother was also harassed and intimidated. On one occasion, for example, an individual came to her home, removed one of the flags that had been planted in her front yard, and re-planted it upside down.

95. Brown’s personal information was posted on X (formerly known as Twitter), and she received numerous threats and hateful messages to her email and on social media.

96. Brown, who also serves as a special education teacher at multiple Springfield City schools, has witnessed the extensive trauma suffered by her students as a result

of the bomb threats and related evacuations. She had to redirect significant attention and resources to assist in helping her particularly vulnerable students deal with these horrific events.

97. The Springfield City Clerk has received threatening communications, both in writing and over the phone. For several weeks, her phone was “ringing off the wall” and she was receiving “some pretty nasty stuff.”

Harassment and Intimidation of Flora

98. After Flora warned Springfield’s Commissioners that Berentz was a Nazi, the Blood Tribe, including John Doe 1, began a campaign of harassment against her.

99. On August 31, 2024, within a 15-minute span from 11:23 p.m. to 11:38 p.m., Flora received nine harassing and violent voicemails from John Doe 1.

100. On September 1, 2024, at 11:49 a.m., Flora received an email from John Doe 3 asking if she would “write us a grant to remove all of the Haitian niggers out of Springfield” and stating “[s]urely there must be some money available somewhere for that.” The email threatened to “find out” if Flora’s partner was “making money off the landlords housing” the Haitian immigrants.

101. On September 1, 2024, at 3:06 p.m., Flora received another voicemail from John Doe 1, who let her know that he knew a great deal about her and her family. John Doe 1 identified the name of the street she lives on, referred to her husband, claiming that he is “making money off the landlords housing these niggers,” and referred to Flora’s work writing grants, asking her to “write us a grant to remove all of the Haitian niggers out of Springfield.”

102. Flora received a message from John Doe 1 on September 4, 2024, threatening her and hinting at sexual violence:

“I’m looking for a fat woman. Maybe your the lucky one. Haha just kidding fuck you nigger lover. Love from the blood tribe[.]”

103. On September 11, 2024, Flora received a package with a return address purportedly for a P.O. box located in Slovakia sent by John Doe 2. Flora called the Springfield police and asked for the bomb squad to confirm the package did not contain an explosive. It did not, but it did contain a note that read, “XOXO, Blood Tribe.”

104. In mid-September, the Blood Tribe, including at least John Doe 4, sent strangers to Flora’s house at night. The first man stood at the door, but Flora did not answer. He eventually returned to his truck and remained there for approximately 20 minutes. Flora called the police, but the man drove away before they arrived.

105. The second man arrived shortly thereafter, and the police were waiting for him. He told the police that he had been sent to Flora’s home based on a fake profile set up on Flora’s behalf on a dating application and was instructed to enter the house without knocking.

Harassment and Intimidation of Shafer

106. On September 24, 2024, Shafer spoke at a City Commission meeting regarding the concern that she has for refugee and immigrant families and children she works with, because of the torrent of hate that had been directed toward the Haitian community.³⁵

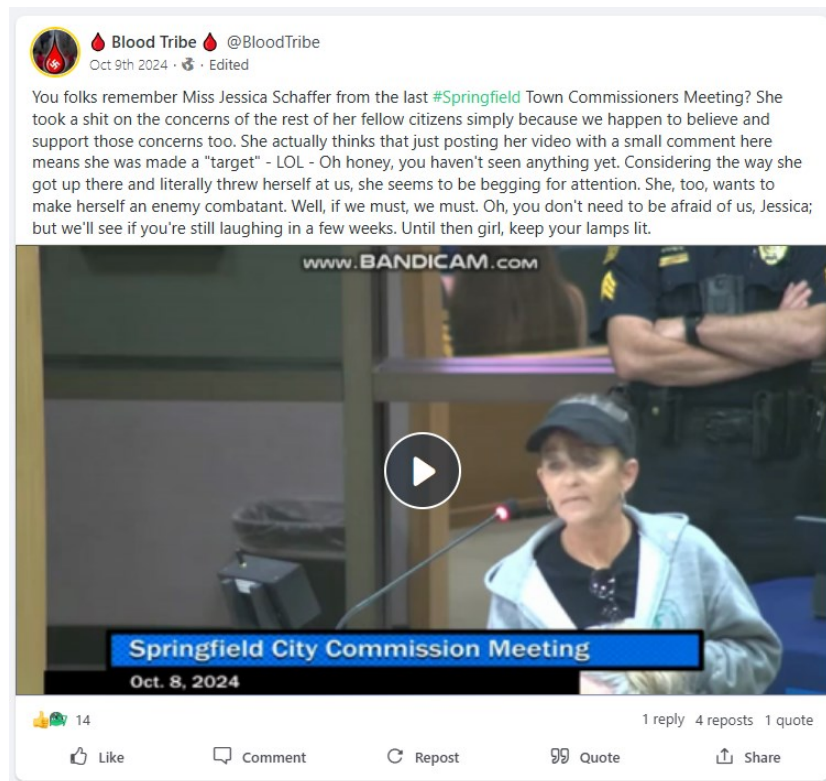
107. Shafer spoke out again at a City Commission meeting on October 8, 2024, describing how she had been targeted by the Blood Tribe.³⁶ The Blood Tribe responded by subjecting Shafer to a barrage of harassment and intimidation.

108. On October 9, 2024, the Blood Tribe issued a harrowing post on social media. They labelled Shafer an “enemy combatant,” warning her that “you haven’t seen

³⁵ Springfield City Commission Meeting (Sept. 24, 2024), at 16:53–20:01
<https://www.youtube.com/watch?v=a4iJNSZoUFM>.

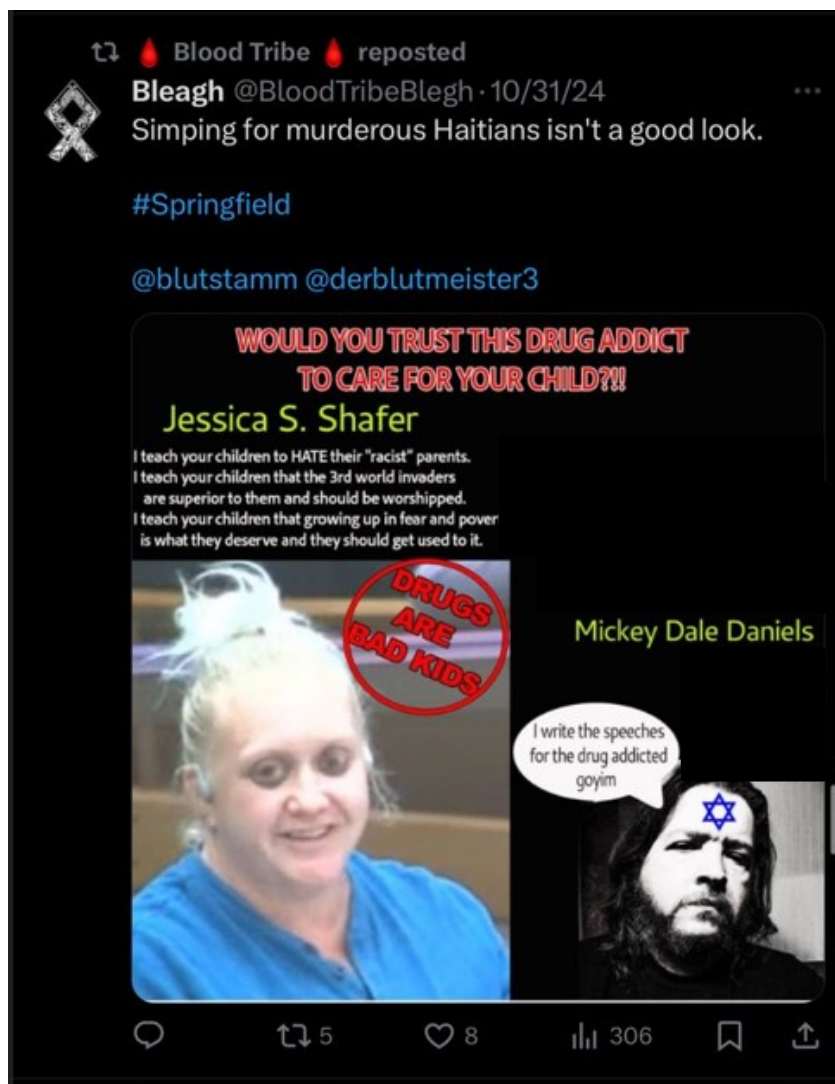
³⁶ Springfield City Commission Meeting (Oct. 8, 2024), at 1:08:40–1:11:07
<https://www.youtube.com/watch?v=uB9F4lmjPgk>.

anything yet” and threatening “we’ll see if you’re still laughing in a few weeks.” “Until then,” they warned, “keep your lamps lit.”



109. On October 31, 2024, the Blood Tribe “doxed” Shafer, publicizing on social media Shafer’s work and home phone numbers and addresses and her work email address. It also posted the name of her partner. The post falsely claimed that Shafer is a drug addict and superimposed a Star of David on her partner’s head with a text bubble that read, “I write the speeches for the drug addicted goyim.”³⁷

³⁷ The address and contact information of Shafer and Daniels have been redacted from the screenshot below.

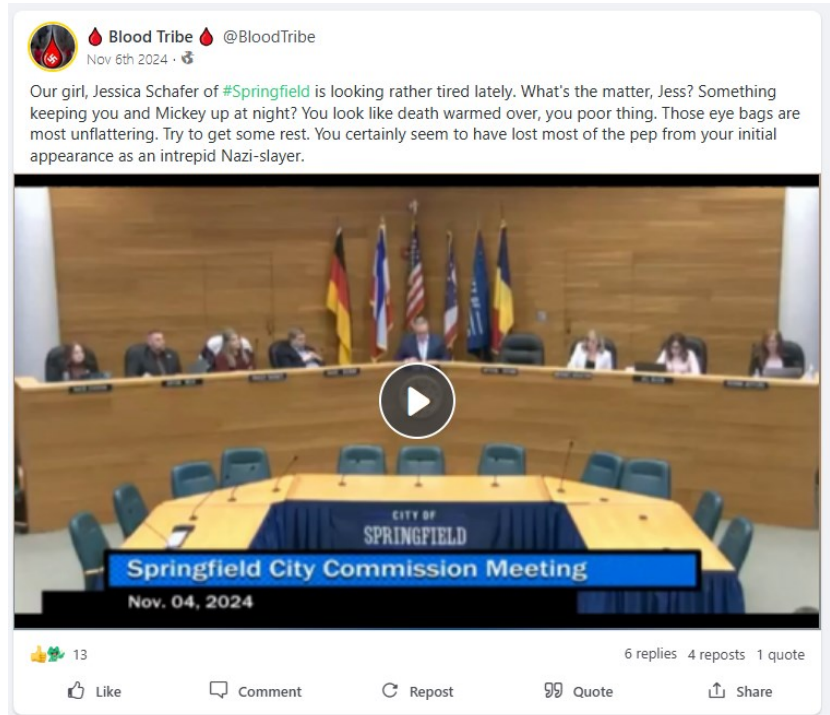


110. Late in the evening of October 30, a Black man showed up at Shafer’s home. He identified himself as Juan and said he was solicited to visit Shafer from an LGBTQ+ dating app called “Jack’d.” Shafer’s partner asked Juan what he was doing outside their home, and Juan replied that someone told him to come there for drugs and sex. The man was sent by Blood Tribe member John Doe 5.

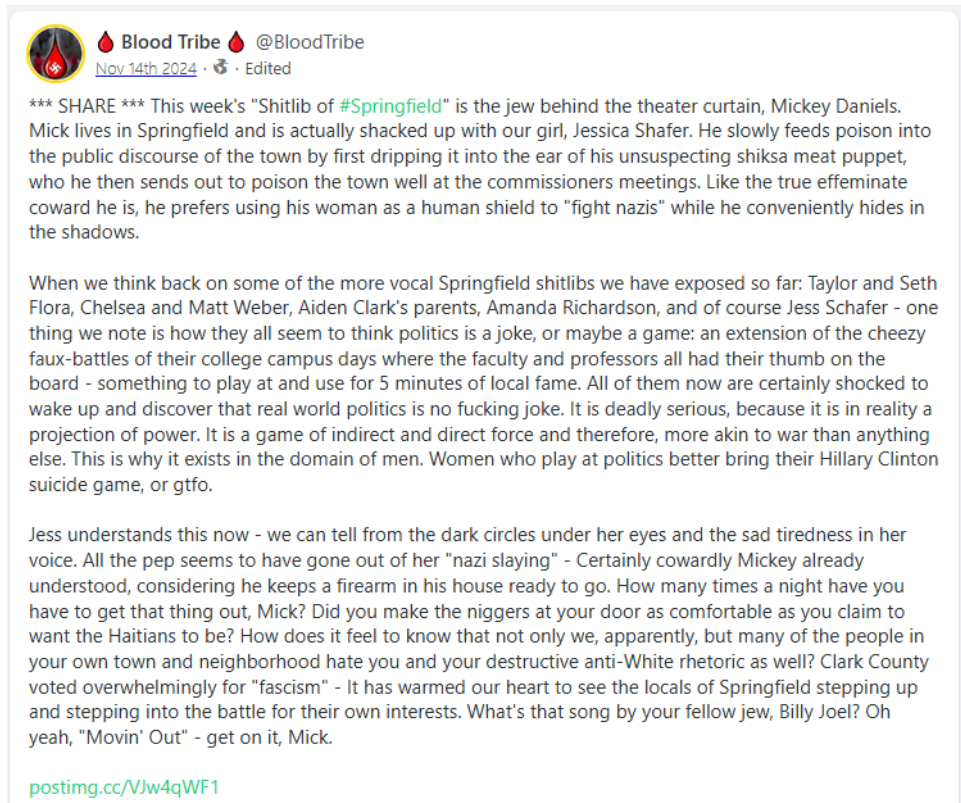
111. On November 2, 2024, John Doe 1, using the pseudonym “Mike Doehunter,” contacted Shafer on Facebook. He called Shafer a “miscreant,” a “freak,” and a “bitch.”

112. On November 8, 2024, another stranger arrived at Shafer's home, again late at night. The man left when Shafer's partner came out with a gun and confronted him.

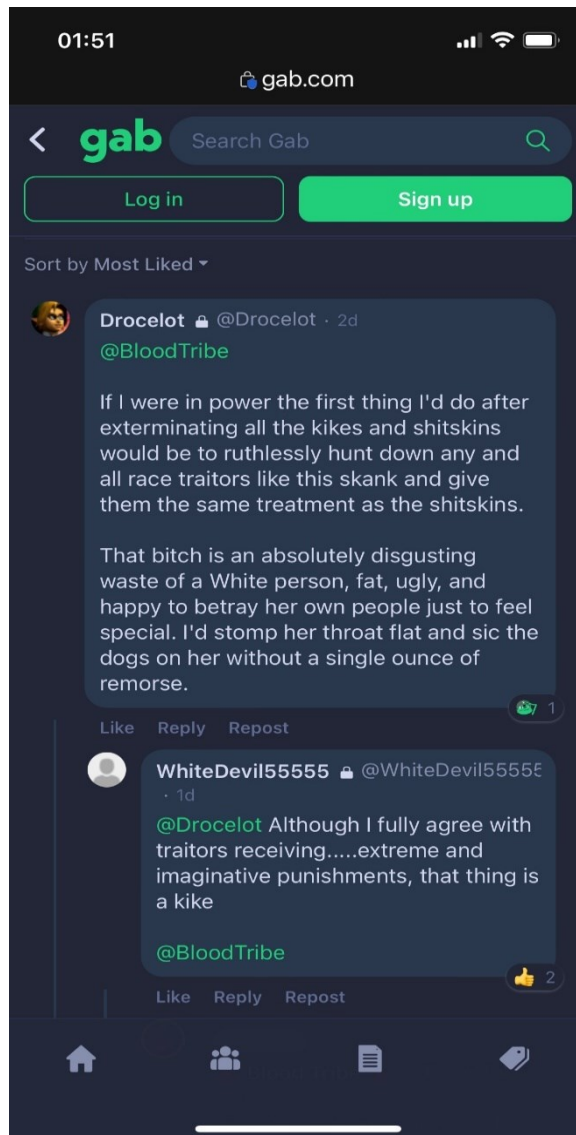
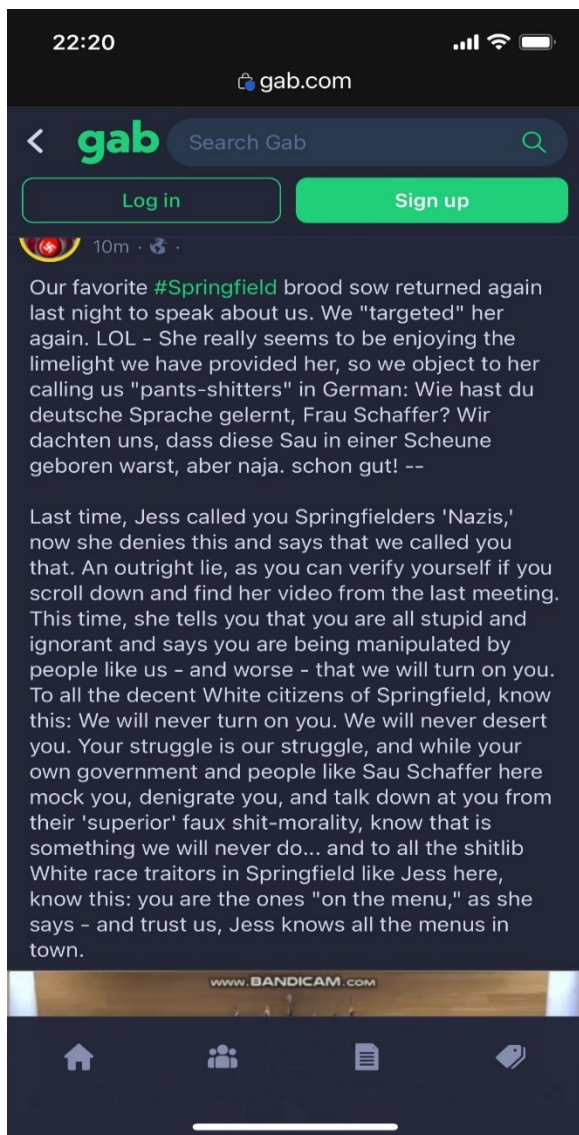
113. The Blood Tribe, including John Doe 5, watched Shafer's home during these encounters and mocked Shafer and her partner on social media. For example, on November 6, 2024, the Blood Tribe gloated, "something keeping you and Mickey up at night?"



114. On November 14, the Blood Tribe again mocked Shafer and her partner on social media, asking "how many times a night you have to get that [firearm] out . . .?" and if Shafer's partner "make[s] the niggers at your door as comfortable as you want the Haitians to be?"



115. Blood Tribe members continued to harass Shafer and other supporters of the Haitian community on social media, calling them “race traitors” and threatening that they are “on the menu.” A comment on one of the posts, referring to Shafer, threatened that if the commenter were in power, “the first thing I’d do after exterminating all the kikes and shitskins would be to ruthlessly hunt down any and all race traitors like this skank and give them the same treatment . . . I’d stomp her throat flat and sic the dogs on her without a single ounce of remorse.”



Harassment and Intimidation of Rollins

116. Rollins works as Executive Director of St. Vincent de Paul Society, a Catholic charitable organization that supports Haitians in the Springfield community.

117. Rollins was subjected to numerous threatening telephone calls from the Blood Tribe or those incited by the Blood Tribe. She has received messages calling her a “N—lover” and asking if she was “part of the importation of N— invaders.”

118. On October 4, 2024, the Blood Tribe attacked Rollins in a social media post, describing her as a “crass, self-centered race traitor, just like all the rest of the Shitlibs we

have so far encountered in Springfield,” and referring to Rollins’s “impending judgement by her god[.]” The Blood Tribe called on its members and others to “[l]et Casey know” that her work was “traitorous.”



119. The Blood Tribe’s social media post included a link to an image that revealed Rollins’s date of birth, email address, home address, and telephone number and included a photo of her home.³⁸

³⁸ The address and contact information of Rollins in the below post have been redacted from the screenshot below.

Casey Kelly Rollins
Executive Director and District President of
Springfield District Council of
St. Vincent de Paul (SVdP)

Miracle (n) - a surprising and welcome event not explicable by natural or scientific laws

Casey Rollins would have us believe the growth of Haitian invaders is some kind of miracle. This is not the case, as her own fingerprints are all over the importation of invaders, to the monetary gain of St. Vincent de Paul and to the detriment of local Springfield residents.

Since Clark County has experienced a miraculous growth in immigrants estimating over 7,000, St. Vincent has broadened its outreach, with deeper ministry to Springfield's Haitian & Hispanic neighbors. While food and shelter needs are essential, immigrants' focuses have centered around their rights to work and have clear immigration statuses.

Casey Rollins goes above and beyond basic charity work when it comes to helping these invaders, to the detriment of her neighbors. Such services include:
Food, clothing, immigration lawyers, work permits, job placement & more

It is clear that under Casey's direction, the Society of Saint Vincent de Paul in Springfield, OH is a corrupted organization that does not prioritize local Springfield residents.

After you follow the money, why would they?

Every new immigrant brings money to organizations, either explicitly or implicitly in the form of grants, donations or in-kind gifts.

This and many other organizations shrug their shoulders at the imported crime and violence, at the increased auto insurance and cost of living, and difficulty in the local job market and act as if they aren't part of the pipeline filling Springfield, Ohio with Haitian invaders.

Springfield District Council St. Vincent de Paul Society
September 27 at 5:08 PM · 🌐

St. Vincent de Paul's heartfelt
THANK YOU to our supporters.

Hello Friends,
Thanks so much for your passion, empathy, and gifts of support for St. Vincent dePaul; as we help all neighbors. These heartbreaking couple of weeks have felt like we've lost a year. It's time for us all to move forward.

**PAY NO ATTENTION TO THE
CHURCH IMPORTING
HAITIAN INVADERS** - Casey Rollins

120. The Blood Tribe and/or the John Does working in concert with the Blood Tribe subsequently used Rollins's personal information to "swat" her (utilize a false police report to prompt an armed response team to come to one's home), and send a bomb threat from her email address.

121. Rollins also lived near Rue and, after the Blood Tribe showed up at Rue's house, she considered moving out of fear for her safety.

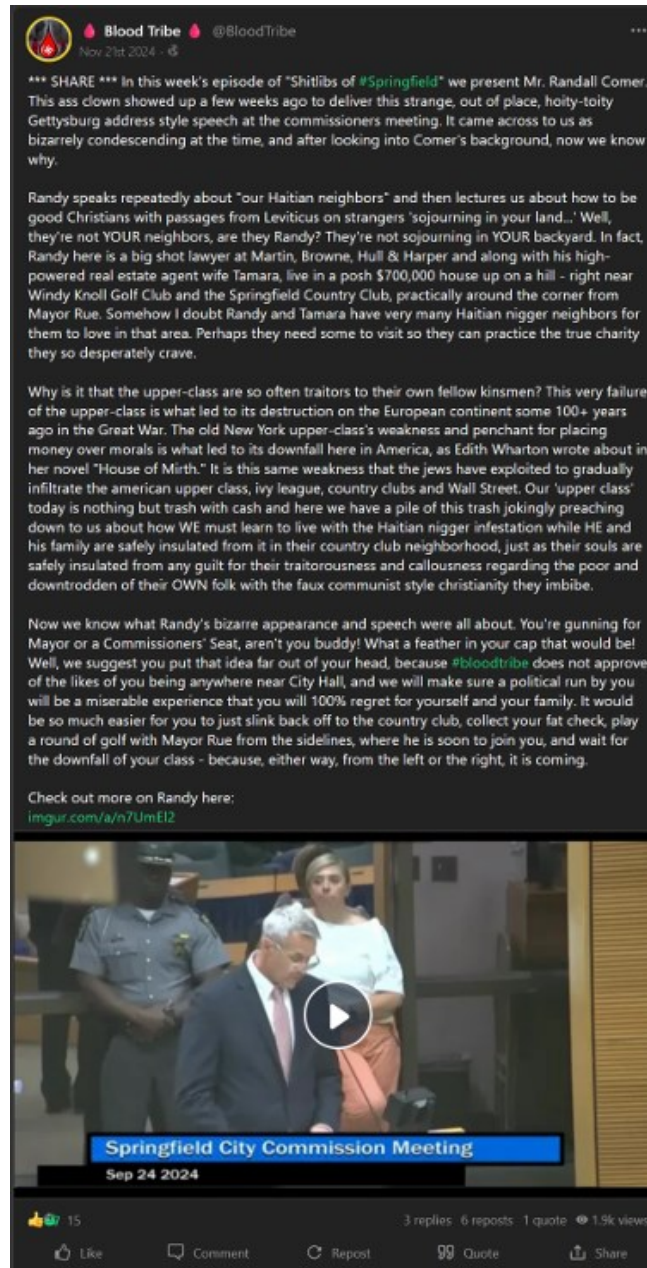
122. In response to the harassment and intimidation, Rollins also increased the security at her St. Vincent de Paul office, including the addition of security windows, alarms, and touch-key security pads, all of which cost at least \$20,000.

Harassment and Intimidation of Comer

123. On September 24, 2024, Comer spoke at a Springfield City Commission meeting to denounce the hate-based rhetoric directed towards the Haitian residents. Comer said that he felt “compelled” to show his “support for Springfield’s Haitian community” and his “solidarity with those who stand against the lies and hatred directed toward our Haitian neighbors.”³⁹ Comer appealed to “moral teachings” and the Bible to ask the audience to “love thy neighbor as thyself.”

124. On November 1, 2024, the Blood Tribe posted on social media that Comer was a race traitor and “upper class . . . trash.” The Blood Tribe vowed to ruin Comer’s professional career, stating that “[it] does not approve of the likes of you being anywhere near City Hall,” and that they would “make sure a political run by you will be a miserable experience that you will 100% regret for yourself and your family.” The Blood Tribe suggested that Comer “wait for the downfall of your class—because . . . it is coming.” Lastly, the Blood Tribe posted images of Comer’s home, work information, and his wife.

³⁹ City Commission Meeting (Sept. 24, 2024), at 1:07:04–1:10:41, <https://www.youtube.com/watch?v=a4iJNSZoUFM>.



125. At approximately 12:00 a.m. on November 27, 2024, an unidentified, uninvited man visited Comer's home. Comer was out of town, but his adult son and elderly mother-in-law were present at the house.

126. The man banged on the front door. Comer's son and mother-in-law were startled and looked out a window to see who was at the door at such a late hour. They did not recognize the man but witnessed him on his cell phone pacing around the front yard. Not

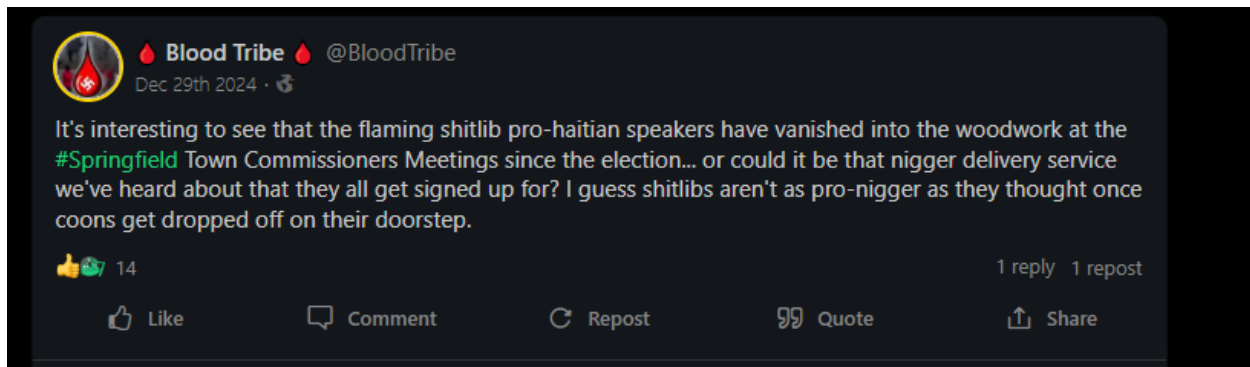
recognizing him, Comer's son and mother-in-law did not answer the door. The man returned to his vehicle and drove away.

127. Approximately 10 minutes later, the man returned to Comer's home whereupon he sat in his vehicle in Comer's driveway for approximately 15 minutes. Thereafter, the man returned to Comer's house and again banged on the front door. Comer's son encountered the man, who was Black, and asked him who he was and what he was doing there. The man indicated that he was there to meet a friend. Comer's son informed him that he had the wrong address and asked him to leave.

128. The man returned to his vehicle and drove away. However, approximately 10 minutes later he returned in his vehicle and again parked in Comer's driveway and remained there for approximately 5 minutes. He then got out of his vehicle, came to the house, and banged on the front door for a third time.

129. Comer's mother-in-law and son were frightened and called Mr. Comer. Mr. Comer instructed his son to call the police. When the police arrived, they identified the man and determined he had been sent to the address at the behest of an individual, going by the name of "Andy" that he had met on "Jack'd." Upon information and belief, the man was sent to Mr. Comer's house by John Doe 6.

130. On December 29, 2024, The Blood Tribe took gleeful credit for purportedly silencing their critics, proclaiming: "It's interesting to see that the flaming shitlib pro-haitian speakers have vanished into the woodwork at the #Springfield Town Commissioners Meetings . . . or could it be that nigger delivery service we've heard about that they all get signed up for? I guess shitlibs aren't as pro-nigger as they thought once coons get dropped off on their doorstep."



131. Other Springfield residents have been targeted. At least one businessman in Springfield has received death threats, was forced to lock down his company, and has been the target of posters around town labeling him a traitor for hiring Haitians.⁴⁰ Springfield residents have also been followed, harassed, and forced to avoid public settings.⁴¹ Many members of the Haitian community are fearful of attending church and have stopped taking their children to amusement centers or letting them play in their own backyards.⁴² One resident even shared that a friend had been attacked walking to a Walgreens.⁴³

CAUSES OF ACTION

COUNT I

Conspiracy to Violate Civil Rights under the Ku Klux Klan Act of 1871, 42 U.S.C. § 1985(3), by the Individual Plaintiffs against All Defendants

132. Plaintiffs reallege and incorporate all prior paragraphs of this Complaint as if fully set forth herein.

133. Section 1985(3) makes it unlawful for two or more persons to conspire “for the purpose of depriving, either directly or indirectly, any person or class of persons of the equal protection of the laws, or of equal privileges and immunities under the laws[.]” Moreover,

⁴⁰ See <https://www.nytimes.com/2024/09/30/us/springfield-ohio-haitians-threats.html>.

⁴¹ See <https://www.pbs.org/newshour/show/how-life-in-springfield-has-been-disrupted-by-lies-about-its-haitian-community>; <https://www.cnn.com/2024/09/18/media/haitian-times-springfield-ohio-immigrants-false-claim/index.html>.

⁴² See <https://www.nytimes.com/2024/10/11/us/haitians-springfield-ohio-pets.html>.

⁴³ See <https://www.nytimes.com/2024/10/11/us/haitians-springfield-ohio-pets.html>.

§ 1985 provides a private right of action where any person does, or causes to be done, “any act in furtherance of the conspiracy, whereby another individual is injured in his person or property, or deprived of having and exercising any right or privilege of a citizen of the United States.” *Id.*

134. Defendants Pohlhaus, Berentz, and John Does 1–7 each agreed, coordinated, and executed a common plan with at least one other person to engage in a campaign of threats, intimidation, and harassment directed at Haitian, Jewish, and nonwhite individuals, as well as those opposed to white supremacy, including Individual Plaintiffs, in denial of their equal protection of the laws and equal privileges thereunder.

135. As set forth in the paragraphs above, one or more of co-conspirator Pohlhaus, Berentz, and John Does 1–7 repeatedly engaged in overt acts in furtherance of this conspiracy, as set forth in the paragraphs above.

136. The illegal activities described above were undertaken by Defendants, their agents, and co-conspirators as express overt acts pursuant to an unlawful conspiracy, the purpose of which was and is to discriminatorily deprive Haitian, Jewish, and nonwhite individuals, and their supporters, of their rights to the equal protection of the laws and their rights to the equal enjoyment of the privileges and immunities of citizens of the United States guaranteed by the Constitution and laws, because of their race, religion, and open and obvious advocacy and support for the rights of nonwhite individuals.

137. The Blood Tribe is vicariously liable for the violations of § 1985 by its agents, each of whom acted within the scope of their agency. At the time of the conspiracy alleged herein, Blood Tribe members acted as the Blood Tribe’s agents within their roles as members of the Blood Tribe.

138. As a direct and proximate result of the overt acts in furtherance of this conspiracy, as set forth in the above paragraphs, each Individual Plaintiff was deprived of one or more of their rights or privileges as a citizen of the United States, including, but not limited to, the right to equal protection of the laws and to equal privileges thereunder.

139. As a direct and proximate result of Defendants' conspiracy and conduct, each Individual Plaintiff suffered injury to their person, including, but not limited to, emotional injury, and is entitled to compensatory, consequential, and punitive damages in an amount to be determined by the Court.

COUNT II

Failure to Prevent Interference with Civil Rights under the Ku Klux Klan Act of 1871, 42 U.S.C. § 1986, by the Individual Plaintiffs against All Defendants

140. Plaintiffs reallege and incorporate all prior paragraphs of this Complaint as if fully set forth herein.

141. Section 1986 makes liable any person who knows that the wrongs conspired to be done as part of a § 1985 conspiracy are about to be committed, has the power to prevent or aid in preventing those wrongs, and yet neglects or refuses to help prevent their occurrence.

142. Defendants had knowledge that the wrongs conspired to be done, as set out in this Complaint, were about to be committed and neglected or refused to prevent or aid in preventing those wrongs.

143. Defendants were in a position and otherwise had the power to prevent, or aid in preventing, the wrongs conspired to be done as asserted in Count I.

144. Defendant Christopher Pohlhaus had knowledge of the conspiracy in violation of 42 U.S.C. § 1985(3) and had the power to prevent or aid in preventing the wrongs conspired to be done under Count I. As the founder of the Blood Tribe and its leader during the

time of the conspiracy alleged herein, Pohlhaus had the power to stop any wrongful action by Blood Tribe members but neglected to take such actions to prevent the conspiracy alleged herein or to make other reasonably diligent efforts to prevent the conspiracy from occurring.

145. Defendant Drake Berentz had knowledge of the conspiracy in violation of 42 U.S.C. § 1985(3) and had the power to prevent or aid in preventing the wrongs conspired to be committed under Count I. As a high-ranking member of the Blood Tribe and its leader on the ground in Springfield during the time of the conspiracy alleged herein, Berentz had the power to stop any wrongful action by Blood Tribe members but neglected to take such actions to prevent the conspiracy alleged herein or to make other reasonably diligent efforts to prevent the conspiracy from occurring.

146. Defendants John Does 1–7 are presently unknown individuals and entities, including associates of Defendants, who knew about the conspiracy alleged in Count I and had the power to prevent or aid in preventing that conspiracy from occurring and neglected or refused to do so.

147. Defendant Blood Tribe is vicariously liable for the violations of § 1986 by its agents, each of whom acted within the scope of its agency. At the time of the conspiracy alleged herein, Blood Tribe members acted as its agents within their roles as members of the Blood Tribe.

148. The Individual Plaintiffs suffered their injuries and damages as a direct and proximate result of the neglect and failure of each Defendant, separately and collectively, to prevent or aid in preventing the wrongs conspired to be done as described in this Complaint.

COUNT III

**Common Law “Absolute” Public Nuisance by Plaintiff City of Springfield
against the Blood Tribe, Christopher Pohlhaus, and Drake Berentz**

149. Plaintiffs reallege and incorporate all prior paragraphs of this Complaint as if fully set forth herein.

150. Defendants intentionally and unreasonably created and maintained an absolute public nuisance through their ongoing conduct of targeting the City of Springfield and its residents with threatening, harassing, and hate-based conduct and messages that:

- a. Significantly interfered with the public health, public welfare, public safety, the public peace, the public comfort, and/or the public convenience of the City of Springfield and its residents and their right to be free from such conduct;
- b. Violated federal and Ohio statutes as described herein; and
- c. Are of a continuing nature and have produced a long-lasting effect, and, as Defendants know or have reason to know, have had a significant effect upon the public rights to health, welfare, safety, peace, comfort, and convenience.

151. The significant interference with rights common to the general public is described in detail throughout this Complaint and includes, but is not limited to, the following:

- a. Repeated bomb and shooting threats directed at schools, hospitals, government buildings, and other public places which required their evacuation and closure;
- b. Reduced ability of emergency services and law enforcement to respond to and address other matters related to public health and safety;

- c. The lost value of productive employees who fear violence or threats directed at them and/or their places of work; and
- d. Increased absenteeism among students in the Springfield City School District who feared violence in their schools.

152. It was reasonably foreseeable that Defendants' actions and omissions would result in the public nuisance and harm to Plaintiff City of Springfield as described herein.

153. The nuisance created by Defendants' misconduct is abatable.

154. Defendants' misconduct is ongoing and persistent.

155. Defendants' misconduct does not concern a discrete event or discrete emergency of the sort that a political subdivision would reasonably expect to occur and is not part of the normal and expected costs of a local government's existence. The City of Springfield alleges wrongful acts which are neither discrete nor of the sort that a local government may reasonably expect.

156. The City of Springfield has incurred significant expenditures as a direct and proximate result of having to respond to Defendants' misconduct over and above the costs of the City's ordinary public services.

157. As a direct and proximate result of Defendants' tortious conduct and the public nuisance created by Defendants, the City of Springfield has suffered and will continue to suffer economic damages, including, but not limited to, significant expenses for police, security, emergency, health, social, and other services, endangering the public welfare, safety, peace, comfort, and convenience of the City and its residents.

158. As a direct and proximate result of Defendants' tortious conduct and the public nuisance created by Defendants, the City of Springfield has suffered and will continue to suffer stigma damage and damage to its proprietary interests.

159. Defendants acted with actual malice because they acted with a conscious disregard for the rights and safety of other persons, and those actions had a great probability of causing substantial harm.

160. The City of Springfield seeks to abate the nuisance created by the Defendants' unreasonable, unlawful, intentional, ongoing, continuing, and persistent actions and omissions and unreasonable interference with rights common to the general public.

161. The City of Springfield has suffered and will continue to suffer unique harms as described in this Complaint, which are of a different kind and degree than those suffered by citizens at large. These are specific harms that can only be suffered by the City of Springfield.

162. Defendant Blood Tribe is vicariously liable for the absolute public nuisance created by its agents, each of whom acted within the scope of its agency. At the time of the conspiracy alleged herein, Blood Tribe members acted as its agents within their roles as members of the Blood Tribe.

COUNT IV
Civil Action for Telecommunications Harassment, Ohio Rev. Code § 2917.21,
by All Plaintiffs against All Defendants

163. Plaintiffs reallege and incorporate all prior paragraphs of this Complaint as if fully set forth herein.

164. Ohio Revised Code § 2307.60(A)(1) creates a civil cause of action for "[a]nyone injured in person or property by a criminal act," and allows for the recovery of "full damages," court costs, and attorneys' fees.

165. Ohio Revised Code § 2917.21(A) provides that “[n]o person shall knowingly make or cause to be made a telecommunication, or knowingly permit a telecommunication to be made from a telecommunications device under the person’s control, to another, if the caller,” among other things: (i) “[m]akes the telecommunication with purpose to harass, intimidate, or abuse any person at the premises to which the telecommunication is made”; (ii) “[k]nowingly makes any comment, request, suggestion, or proposal to the recipient of the telecommunication that is threatening, intimidating, menacing, coercive, or obscene with the intent to abuse, threaten, or harass the recipient”; or (iii) “[k]nowingly incites another person through a telecommunication or other means to harass or participate in the harassment of a person.”

166. Ohio Revised Code § 2917.21(B)(1) provides that “[n]o person shall make or cause to be made a telecommunication, or permit a telecommunication to be made from a telecommunications device under the person’s control, with purpose to abuse, threaten, or harass another person.”

167. Under Ohio Revised Code §§ 2917.21(G)(3) and 2913.01(X), the term “telecommunication” means “the origination, emission, dissemination, transmission, or reception of data, images, signals, sounds, or other intelligence or equivalence of intelligence of any nature over any communications system by any method, including, but not limited to, a fiber optic, electronic, magnetic, optical, digital, or analog method.”

168. Defendants Pohlhaus, Berentz, and John Does 1–7 violated Ohio Revised Code § 2917.21 by repeatedly sending telecommunications, including phone calls, emails, and other messages with the purpose of harassing, intimidating, or abusing Plaintiffs and others and

inciting others to harass or participate in the harassment of Plaintiffs and others, as described herein.

169. Defendant Blood Tribe is vicariously liable for the violations of Ohio Revised Code § 2307.60(A) by its agents, each of whom acted within the scope of its agency. At the time of the conspiracy alleged herein, Blood Tribe members acted as its agents within their roles as members of the Blood Tribe.

170. Plaintiffs suffered their injuries and have been damaged as a direct and proximate result of Defendants' acts of telecommunications harassment.

COUNT V
Civil Action for Menacing, Ohio Rev. Code §§ 2903.21, 2903.22, and 2903.211,
by the Individual Plaintiffs against All Defendants

171. Plaintiffs reallege and incorporate all prior paragraphs of this Complaint as if fully set forth herein.

172. Ohio Revised Code § 2307.60(A)(1) creates a civil cause of action for “[a]nyone injured in person or property by a criminal act” and allows for the recovery of “full damages,” court costs, and attorneys’ fees, as well as punitive damages.

173. Ohio Revised Code § 2903.21 (aggravated menacing) provides that “[n]o person shall knowingly cause another to believe that the offender will cause serious physical harm to the person or property of the other person, the other person’s unborn, or a member of the other person’s immediate family.”

174. Ohio Revised Code § 2903.22 (menacing) provides that “[n]o person shall knowingly cause another to believe that the offender will cause physical harm to the person or property of the other person, the other person’s unborn, or a member of the other person’s immediate family.”

175. Ohio Revised Code § 2903.211(A) (menacing by stalking) provides that “[n]o person by engaging in a pattern of conduct shall knowingly cause another person to believe that the offender will cause physical harm to the other person or a family or household member of the other person or cause mental distress to the other person or a family or household member of the other person.”

176. Ohio Revised Code § 2903.211(A)(2) makes it a crime to “urge or incite another to commit a violation of division (A)(1)” through the “use of any form of written communication or any electronic method.”

177. Defendants Pohlhaus, Berentz, and John Does 1–7 violated Ohio Revised Code §§ 2903.21 and 2903.22 by repeatedly targeting the Individual Plaintiffs with threats, harassment, and stalking and urging and inciting others to do the same, which caused the Individual Plaintiffs to fear that Defendants Pohlhaus, Berentz, and John Does 1–7 would cause serious physical harm to them or to members of their immediate families, as described herein.

178. Defendant Blood Tribe is vicariously liable for the violations of Ohio Revised Code § 2307.70(A) by its agents, each of whom acted within the scope of its agency. At the time of the conspiracy alleged herein, Blood Tribe members acted as its agents within their roles as members of the Blood Tribe.

179. Individual Plaintiffs suffered their injuries and have been damaged as a direct and proximate result of Defendants’ acts of menacing.

COUNT VI
Civil Liability for Inciting to Violence, Ohio Rev. Code § 2917.01(A)(1),
by All Plaintiffs against All Defendants

180. Plaintiffs reallege and incorporate all prior paragraphs of this Complaint as if fully set forth herein.

181. Ohio Revised Code § 2307.60(A)(1) creates a civil cause of action for “[a]nyone injured in person or property by a criminal act” and allows for the recovery of “full damages,” court costs, and attorneys’ fees, as well as punitive damages.

182. Ohio Revised Code § 2917.01(A)(1) (inciting to violence) provides that “[n]o person shall knowingly engage in conduct designed to urge or incite another to commit any offense of violence, when . . . [t]he conduct takes place under circumstances that create a clear and present danger that any offense of violence will be committed.”

183. Defendants Pohlhaus, Berentz, and John Does 1–7 violated Ohio Revised Code § 2917.01(A)(1) by urging and inciting Blood Tribe members, their followers, and members of the public to “hit” Springfield and to commit violence against Plaintiffs and other residents of Springfield. And, in the weeks and months that followed, Defendants continued to violate Ohio Revised Code § 2917.01(A)(1) by repeatedly targeting Plaintiffs with harassing and hate-based conduct and messages that threatened violence against them.

184. Given the hateful nature of Defendants’ calls to action, their brandishing of assault weapons during marches in Springfield, and the threats of imminent violence that followed, their conduct took place under circumstances creating a clear and present danger that any offense of violence would be committed.

185. Defendant Blood Tribe is vicariously liable for violations of Ohio Revised Code § 2917.01(A)(1) by its agents, each of whom acted within the scope of its agency. At the time of the conspiracy alleged herein, Blood Tribe members acted as its agents within their roles as members of the Blood Tribe.

186. Plaintiffs suffered their injuries and have been damaged as a direct and proximate result of Defendants’ acts of incitement to violence.

COUNT VII
Civil Liability for Ethnic Intimidation, Ohio Rev. Code § 2307.70(A),
by All Plaintiffs against All Defendants

187. Plaintiffs reallege and incorporate all prior paragraphs of this Complaint as if fully set forth herein.

188. Ohio Revised Code § 2307.70(A) creates a civil cause of action for “[a]ny person who suffers injury or loss to person or property as a result of an act committed in violation of section 2909.05, 2927.11, or 2927.12 of the Revised Code” and allows for the recovery of compensatory damages, punitive damages, court costs, and attorneys’ fees.

189. Ohio Revised Code § 2927.12 (ethnic intimidation) prohibits acts of intimidation or harassment “by reason of the race, color, religion, or national origin of another person or group of persons.”

190. The actions of Defendants Blood Tribe, Pohlhaus, Berentz, and John Does 1–7, in violation of Ohio Revised Code §§ 2903.21 (aggravated menacing), 2903.22 (menacing), and 2917.21 (telecommunications harassment), were motivated by reason of race, color, religion, or national origin of another person or group of persons, as described herein.

191. Defendant Blood Tribe is vicariously liable for the violations of Ohio Revised Code § 2307.70(A) by its agents, each of whom acted within the scope of its agency. At the time of the conspiracy alleged herein, Blood Tribe members acted as its agents within their roles as members of the Blood Tribe.

192. Plaintiffs suffered their injuries and have been damaged as a direct and proximate result of Defendants’ acts of ethnic intimidation.

COUNT VIII
Civil Conspiracy
by All Plaintiffs against All Defendants

193. Plaintiffs reallege and incorporate all prior paragraphs of this Complaint as if fully set forth herein.

194. Each Defendant conspired together and combined with one or more persons to accomplish, through the concerted action described above, unlawful and tortious acts, including, but not limited to, the following:

- a. Subjecting persons to menacing and harassment by reason of the race, color, religion, or national origin of another person or group of persons in violation of Ohio Revised Code § 2927.12;
- b. Knowingly causing persons to fear serious physical harm to their person or property or members of their immediate family in violation of Ohio Revised Code §§ 2903.21(A), 2903.22(A)(1), and 2903.211(A)(1);
- c. Knowingly making or causing to be made harassing telecommunications in violation of Ohio Revised Code §§ 2917.21(A) and (B);
- d. Knowingly engaging in conduct designed to urge or incite another to commit an offense of violence in violation of Ohio Revised Code § 2917.01;
- e. Causing the evacuation of a public place or otherwise causing serious public inconvenience or alarm in violation of Ohio Revised Code § 2917.31(A); and

- f. Reporting or causing to be reported knowingly false or misleading information to a law enforcement agency, emergency service provider, or public safety answering point, in violation of Ohio Revised Code § 2917.321(B).

195. Each of the Plaintiffs suffered damages resulting from acts committed in furtherance of the conspiracy.

196. As co-conspirators, Defendants are civilly liable to Plaintiffs for the actions of all individuals who acted in pursuit of the common conspiratorial scheme.

197. Defendant Blood Tribe is vicariously liable for acts committed in furtherance of the conspiracy by its agents, each of whom acted within the scope of its agency. At the time of the conspiracy alleged herein, Blood Tribe members acted as its agents within their roles as members of the Blood Tribe.

COUNT IX
Intentional Infliction of Emotional Distress by the Individual Plaintiffs
against All Defendants

198. Plaintiffs reallege and incorporate all prior paragraphs of this Complaint as if fully set forth herein.

199. Defendants acted extremely and outrageously by encouraging the members of the Blood Tribe and other neo-Nazi organizations to “hit” Springfield and its residents with threats and harassment.

200. Defendants further acted extremely and outrageously by, among other things, the following actions:

- a. Issuing bomb threats and calling for the death of the City Commissioners;

- b. Using dating sites to prompt men to appear at the homes of Flora, Shafer, and Comer in the middle of the night with the intent of frightening them and provoking a violent response;
- c. Sending voicemails and messages to Flora threatening her and her family with physical harm; and
- d. Issuing threats to the home and family of Rue.

201. Defendants intentionally caused emotional distress to Plaintiffs through their threats and conduct. Defendants intended to cause this distress to dissuade Plaintiffs and others from supporting Springfield's Haitian community in the hope of causing further harm to Springfield and its Haitian community.

202. Defendants' actions caused severe emotional injury to Plaintiffs.

203. As a direct and proximate result of Defendants' concerted actions, Plaintiffs are entitled to compensatory damages, punitive damages, and damages for costs and reasonable attorneys' fees.

204. Defendant Blood Tribe is vicariously liable for intentional infliction of emotional distress its agents, each of whom acted within the scope of its agency. At the time of the conspiracy alleged herein, Blood Tribe members acted as its agents within their roles as members of the Blood Tribe.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully request an award of the following relief:

- a. A declaratory judgment that Defendants deprived Plaintiffs of their rights under federal and state law;
- b. Injunctive relief enjoining Defendants from future violations of rights guaranteed by federal and state law;

- c. Compensatory and statutory damages in an amount to be determined at trial;
- d. Punitive damages in an amount to be determined at trial;
- e. Interest, attorneys' fees, and costs; and
- f. Such other relief as the Court deems necessary and just.

JURY DEMAND

Plaintiffs demand a trial by jury on all issues so triable.

Dated: February 6, 2025

Respectfully submitted,

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