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15 Alliance, Ezra Ministries, and Ruth Mastron

16 *\*Pro Hac Vice Motion forthcoming*

17 **UNITED STATES DISTRICT COURT**  
18 **SOUTHERN DISTRICT OF CALIFORNIA**

19 Christian and Jewish Alliance Inc., a  
20 California not-for-profit corporation,  
21 Ezra Ministries, a California not-for-  
22 profit religious corporation, d/b/a The  
23 Mission Church, and Ruth Mastron,

24 *Plaintiffs,*

25 v.

26 Daniel Brunner, Aimee Magda Werth,  
27 Kristina Turner-Brown, Patrick Hartley,  
28 Sasha Spite Miller, Jacob Pagaduan,  
Esmat “Essie” Baradar, Jonathan  
Provance, Maya Karalius, and Does 1-  
40,

*Defendants.*

Case No. **'25CV2992 W AHG**

**COMPLAINT FOR:**

- 1. **Violations of 18 U.S.C. § 248(a)(1)**
- 2. **Trespass**

**DEMAND FOR JURY TRIAL**

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**INTRODUCTION**

1. As worshipers have gathered at three separate events this year, a mob has targeted Plaintiffs The Mission Church (the “Church”) of Carlsbad and The Christian & Jewish Alliance (the “Alliance”) of the San Diego area, interfering with their worship services, intimidating their members and guests, and obstructing their access to gather safely. This mob targeted the Church and the Alliance due to the sincere religious beliefs of their members that require support for Israel. Plaintiff Ruth Mastron, a Jewish resident of Oceanside, was assaulted as she attempted to enter one of these events.

2. The campaign of disruption and harassment was perpetrated by Defendants Daniel Brunner, Aimee Magda Werth, Sasha Spite Miller, Kristina Turner-Brown, Patrick Hartley, Jacob Pagaduan, Essie Baradar, Jonathan Provance, Maya Karalius, and Does 1-40.

3. On March 19, Christian congregants and Jewish visitors at the Church who hoped to worship together and learn about religious persecution in Israel instead endured unsolicited vitriol and harassment. Once the event started, Defendants Brunner, Hartley, and Does 1-17 began loudly protesting outside the front door of the Church, which abuts a narrow sidewalk that abuts the street. Once the outside protesters were audible in the Sanctuary, Defendants Turner-Brown, Miller, Pagaduan, Baradar, and Does 17-20, who had obtained access to the Church by providing false names and pretending to be event attendees, began disrupting the event from inside the sanctuary in staggered intervals—screaming, threatening congregants, and physically resisting removal. Once the event ended, all attending Defendants blockaded egress from the Church to the parking lot, intentionally creating a chaotic and violent environment for hundreds of guests seeking to leave.

4. One month later, on Easter Sunday, Defendants Brunner, Turner-Brown, Hartley, and Does 21–25 returned to the Church to spoil the holiest day on the Christian calendar. Defendants and other disruptors shouted with bullhorns on

1 the sidewalk, targeting children’s activities in the parking lot, obstructing access to  
2 the overflow parking lot, and deterring visitors from attending the Church’s Easter  
3 services. This four-hour disruption had its intended effect: to further intimidate the  
4 members and guests (including small children) who attended the Church’s services.

5 5. On September 7, 2025, Defendants Brunner, Werth, Miller, Turner-  
6 Brown, Hartley, Provance, Karalius, and Does 26–40 disrupted another worship  
7 event, which the Alliance hosted, the Church sponsored, and Mastron attended.  
8 Defendants and other disruptors blocked off one of the entrances to the worship  
9 venue and surrounded the other entrance, jumping on Mastron’s car and hitting and  
10 blocking other guests’ cars as they tried to enter. The disruptors then gathered at  
11 the back of the amphitheater, blaring imitation police sirens and hurling epithets for  
12 three hours during the interfaith prayer and worship service.

13 6. Defendants’ actions have created a culture of anxiety and fear within  
14 both the Church and the Alliance, causing both to cancel religious events and  
15 expend additional resources to ensure the safety of their members. The Church has  
16 also lost membership as a result of Defendants’ disruptions, while the Alliance has  
17 found it increasingly difficult to secure safe locations to host interfaith worship and  
18 prayer events.

19 7. Defendants’ actions have likewise caused severe stress and lingering  
20 anxiety for Mastron, who experiences heightened situational awareness and anxiety  
21 when in public in her own community, due to the threat posed by Defendants.

22 8. Defendants have no regrets about their actions. They have publicly  
23 vowed to continue “doing our part to fight the war against Zionism, which is an  
24 abomination ... We ain’t shuttin’ up and we ain’t goin nowhere.”

25 9. Federal and California law do not tolerate Defendants’ conduct, which  
26 violated the civil rights of The Mission Church, the Christian & Jewish Alliance,  
27 and their members and guests, including Mastron. Defendants’ conduct violates,  
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1 and is actionable under, the Freedom of Access to Clinic Entrances Act (“FACE  
2 Act”), 18 U.S.C. § 248, as well as California tort law.

3 10. Defendants have committed and are almost certain to continue  
4 committing violations of the FACE Act, by their injury, intimidation, and  
5 obstruction of Jews and Christians seeking to exercise their First Amendment rights  
6 of religious freedom at places of religious worship.

7 **JURISDICTION AND VENUE**

8 11. This Court has subject-matter jurisdiction under 28 U.S.C. §§ 1331,  
9 1343, and 1367. It has authority to provide compensatory, punitive, declaratory,  
10 injunctive, and other relief in this action, including under 18 U.S.C. § 248(c)(1)(B);  
11 28 U.S.C. §§ 1343, 2201, 2202; and Cal. Civ. Code §§ 3294, 3333.

12 12. Venue is proper under 28 U.S.C. § 1391(b) because all events giving  
13 rise to the claims detailed in this Complaint occurred within the Southern District  
14 of California, and at least eight Defendants reside in the District.

15 **PARTIES**

16 ***The Mission Church***

17 13. Plaintiff The Mission Church is a non-denominational Christian church  
18 and a California not-for-profit religious corporation registered under the name Ezra  
19 Ministries. Its principal location is 825 Carlsbad Village Dr., Carlsbad, CA 92008.  
20 The Church owns and operates its place of religious worship.

21 14. The Church serves the Carlsbad community and region through  
22 worship services, prayer, community events, and outreach.

23 15. Established in 2011 as a home Bible study, and moving to its current  
24 facility in 2018, the Church holds a “simple” guiding philosophy of ministry: “We  
25 love Jesus and we love people.”

26 16. Since its founding, the Church has grown to a congregation of 3,000,  
27 becoming an integral part of the Carlsbad community. Attendance on a typical  
28 Sunday, including children, exceeds 1,000 worshipers. In addition to weekly

1 services, Bible studies, and ministry work, the Church hosts a wide range of  
2 community service and social events.

3 17. Pastor David Menard is the founding and lead pastor of the Church. He  
4 leads the team that established and nurtured the Church into a thriving resource for  
5 Christians in Carlsbad and beyond.

6 18. Pastor JC Cooper is an assistant pastor at the Church, where he has  
7 served since 2018.

8 ***The Christian & Jewish Alliance***

9 19. Plaintiff The Christian & Jewish Alliance Inc. is an interfaith  
10 organization and a California not-for-profit corporation.

11 20. The Alliance was founded in May 2024 in the wake of the horrific  
12 massacre of over 1,200 Jews on October 7, 2023, and the surge in antisemitic  
13 attacks worldwide in the months after.

14 21. In the aftermath of the October 7 attacks, members of the Jewish  
15 community in the San Diego area felt isolated and alone, having witnessed not  
16 only the largest massacre of Jews since the Holocaust, but also widespread hatred  
17 even among their own neighbors after that massacre.

18 22. Refusing to believe that Jews were alone in their struggle, a local  
19 Jewish leader, Liat Cohen-Reeis, felt called to reach out to churches and  
20 synagogues in the San Diego area with a proposal to create an interfaith  
21 organization to support Israel and the Jewish community.

22 23. A number of synagogues and churches, including The Mission Church,  
23 answered Cohen-Reeis's call, acting out of sincere religious beliefs to support  
24 Israel. These groups formed the Alliance.

25 24. Cohen-Reeis serves as the President of the Alliance, which also has a  
26 Vice President and Treasurer.

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***Defendants***

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2           32. Defendant *Daniel Brunner* is a resident of San Diego, California. He  
3 led the other Defendants in the illegal conduct at the Church during the March 19  
4 and Easter Sunday events, and at the interfaith worship service on September 7.  
5 Targeting churches and worshipers, he has maintained a campaign to recruit others  
6 to join his “war against Zionism, which is an abomination.”

7           33. Defendant *Aimee Magda Werth* is a resident of La Jolla, California. She  
8 led the other Defendants in the illegal conduct interfering with the interfaith  
9 worship service on September 7. She likewise recruits others to join her efforts to  
10 intimidate supporters of Israel, even when gathered in worship.

11           34. Defendant *Kristina Turner-Brown* is a resident of Escondido,  
12 California. She participated alongside the other Defendants in the illegal conduct  
13 interfering with worship at the Church during the March 19 and Easter Sunday  
14 events, as well as at the interfaith worship service on September 7.

15           35. Defendant *Patrick Hartley* is a resident of San Diego, California. He  
16 participated alongside the other Defendants in the illegal conduct interfering with  
17 worship at the Church during the March 19 and Easter Sunday events, as well as  
18 at the interfaith worship service on September 7.

19           36. Defendant *Sasha Spite Miller* is a resident of Escondido, California.  
20 She participated alongside the other Defendants in the illegal conduct interfering  
21 with worship at the Church on March 19 and at the interfaith worship service on  
22 September 7.

23           37. Defendant *Jacob Pagaduan* is a resident of San Diego, California. He  
24 participated alongside the other Defendants in the illegal conduct interfering with  
25 worship at the Church on March 19.

26           38. Defendant *Esmat “Essie” Baradar* is a resident of San Diego,  
27 California. She participated alongside the other Defendants in the illegal conduct  
28 interfering with worship at the Church on March 19.



1 Genesis 12:2 (“I will make you a great nation; I will bless you And make your  
2 name great; And you shall be a blessing.”).

3 46. Likewise, the Church believes that God “will bless those who bless  
4 [Israel], and ... will curse him who curses [Israel].” Genesis 12:3; *see also, e.g.,*  
5 Zechariah 2:8–9 (“[F]or he who touches [Israel] touches the apple of His eye. For  
6 surely I will shake My hand against them, and they shall become spoil for their  
7 servants.”).

8 47. Under these dispensationalist beliefs, supporting the Jewish people and  
9 the Nation of Israel is deeply and sincerely ingrained in the Church’s theological  
10 teaching and activities. The Church regularly hosts events with local Jewish groups,  
11 and its pastors are involved in the Christian & Jewish Alliance.

12 ***The Christian and Jewish Alliance’s and Ruth Mastron’s Religious Beliefs***

13 48. The Christian & Jewish Alliance formed for the religious purpose of  
14 uniting Christians and Jews in their religious beliefs to stand with Israel and against  
15 antisemitism. “[D]riven by a moral imperative to speak out and act,” the Alliance’s  
16 core belief is “that Israel is not only the historic and ancestral home of the Jewish  
17 people but also central to the unfolding plan of God.”

18 49. To further this religious mission, the Alliance holds itself out as a  
19 religious organization and hosts interfaith events involving prayer, worship, and  
20 messages from local faith leaders including rabbis and pastors. For example, Pastor  
21 David Menard has spoken at several events that the Alliance hosted.

22 50. For the Christian members of the Alliance, many of whom are members  
23 of San Diego-area churches, standing with Israel is a core expression of their  
24 Christian faith. These members follow dispensationalist beliefs like those of The  
25 Mission Church. *See supra* ¶¶ 44–47.

26 51. For the Jewish members of the Alliance, including Mastron, their faith  
27 includes traditional Torah beliefs that practicing Jews have held for millennia.  
28 Torah and Talmudic teaching are clear that Jews are the people of God and that

1 the land of Israel is their divinely ordained homeland. To support Israel is a core  
2 expression of their faith.

3 52. Torah and Talmudic teaching instruct that Israel is the land that God  
4 promised to the Jewish patriarchs, Abraham, Isaac, and Jacob. *See, e.g.*, Genesis  
5 12:7 (Contemporary Torah) (“I will assign this land to your offspring.”); Exodus  
6 3:17 (“I will take you out of the misery of Egypt to the land of the Canaanites, the  
7 Hittites, the Amorites, the Perizzites, the Hivites, and the Jebusites, to a land  
8 flowing with milk and honey”).

9 53. The modern Nation of Israel is seen as part of God’s promise to restore  
10 this land to the Jews. *See* Ezekiel 36:24 (“I will take you from among the nations  
11 and gather you from all the countries, and I will bring you back to your own land.”);  
12 *see also, e.g.*, Babylonian Talmud, Ketubot 110b (“[A]nyone who resides in Eretz  
13 Yisrael is considered as one who has a God.”).

14 54. Observant Jews pray three times a day facing Jerusalem for a return to  
15 Israel as their physical and spiritual homeland. Nissan Mendel, *The Three Daily*  
16 *Prayers*, <https://tinyurl.com/mrseu5z5>. Those prayers likewise seek God’s  
17 “[r]eturn in mercy to Jerusalem” to “rebuild it, soon in our days, as an everlasting  
18 edifice.” *Amidah (Weekday Morning Service)*, in *The Koren Siddur* 114 (J. Sacks  
19 trans. 2009). Every religious festival or holy day that Jews celebrate throughout  
20 the calendar year includes prayers for restoring the holy temple in Jerusalem. Many  
21 Torah commandments can only be performed in the Holy Land. Rabbi Aharon  
22 Lichtenstein, *Laws Dependent Upon the Land of Israel* (D. Strauss trans. 2015).

23 55. Under these religious beliefs, supporting the Nation of Israel and  
24 longing for a return to this physical and spiritual homeland is sincerely ingrained  
25 in the Jewish members of the Alliance, including Mastron, and informs their  
26 religious activities. Supporting Israel is a core expression of devout Jewish faith.

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1           ***The Increasingly Violent Climate of Antisemitism Since October 7, 2023***

2           56. Although Jews have long been outsized targets of race- and religion-  
3 based attacks, the number of antisemitic hate crimes has dramatically increased  
4 since the October 7, 2023, attack on Israeli civilians. The number of anti-Jewish  
5 hate incidents in the United States increased 63% in 2023, and another 5% in 2024.  
6 The thousands of anti-Jewish hate crimes recorded in 2023 represent the highest  
7 number ever recorded since the Federal Bureau of Investigation began collecting  
8 data in 1991, a record attributed to a surge following October 7.

9           57. According to the California Department of Justice, anti-Jewish hate  
10 crimes accounted for 73% of all hate crimes in the State tied to religious bias in  
11 2023, with an outsized number occurring after October 7.

12           58. In San Diego County, antisemitic incidents dramatically rose following  
13 the October 7, 2023, attack, setting new records in both 2023 and 2024.

14           59. Among the thousands of antisemitic incidents that have occurred since  
15 October 7, 2023, are high-profile bomb threats against Southern California  
16 synagogues, attempted murders in Los Angeles, and the murder of an engaged  
17 couple employed by the Israeli Embassy in broad daylight.

18           60. Anti-Israel protests have been focal points for antisemitic activity. In  
19 early 2024, protesters at a California university caused a campus-wide shutdown  
20 as they occupied a central administrative building for over a week—committing  
21 vandalism throughout the building and violently clashing with law enforcement.  
22 Anti-Israel protesters have engaged in similarly dangerous and lawbreaking  
23 activity across the country, including protests that block traffic and devolve into  
24 assaults on bystanders.

25           61. Antisemitic disruptions have targeted religious services of Jews and  
26 Christians who support Israel. Since the October 7 massacre, multiple suits have  
27 been filed seeking relief from violent mobs that harassed, intimidated, and harmed  
28 worshipers seeking to exercise the right to freely exercise their religion. *See, e.g.,*

1 *United States v. Party for Socialism & Liberation N.J.*, No. 2:25-cv-16049 (D.N.J.,  
2 filed Sept. 29, 2025); *Pollak v. CODEPINK Women for Peace*, 2:24-cv-06253  
3 (C.D. Cal., filed July 24, 2024).

4 62. Unchecked antisemitism expands, adding to its target any who show  
5 solidarity with the Jewish people and the nation of Israel. Christians, like those of  
6 The Mission Church, make easy targets for those hoping to isolate the Jewish  
7 people, intimidating those who would otherwise be their closest supporters. Such  
8 anti-Christian prejudice thus becomes a subset of antisemitism.

9 63. Blaming the victims for what they have suffered is a common  
10 antisemitic tactic, also called “inversion.” Because Jews suffered a genocide  
11 during the Holocaust, Defendants’ accusation that Jews are committing “genocide”  
12 is especially offensive. Because Jews were slaughtered by Nazis, Defendants’  
13 calling them “Nazis” is deeply hurtful. Because Jews have long called themselves  
14 Zionists (Zion refers to their biblical homeland as the city of God), Defendants  
15 attempting to convert that into a slur is likewise offensive.

16 64. Both the broader statistics regarding violent crimes against supporters  
17 of Israel and individual high-profile instances of hate crimes and incidents are well  
18 known to officers of the Church, Church congregants, the Alliance, and attendees  
19 of the Alliance’s events.

### 20 *The March 19 Worship Service*

21 65. The Church found itself in the crosshairs of this opposition after Pastor  
22 David Menard spoke at events for the Alliance and a nearby Jewish center in  
23 October 2024. Those events were disrupted by Brunner and other individuals who  
24 would later disrupt the Church’s events.

25 66. On March 19, 2025, the Church hosted an event headlined by Dr. Einat  
26 Wilf, who is Jewish, a former member of the Israeli Knesset, a renowned scholar,  
27 and an expert on the current conflict in the Middle East.

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1           67. The purpose of the event was religious. Members of the Church  
2 gathered to pray corporately for their Jewish neighbors and the peace of Israel,  
3 worship, learn about the ongoing conflict, and encourage the local Jewish  
4 community as a part of their Christian duty.

5           68. The Church hosted this event during its weekly Wednesday night  
6 worship service for young adults.

7           69. The Church partnered with the Alliance to host the event.

8           70. The Church required guests to pre-register by name to attend, though  
9 the event was free. The Church conditioned entrance on asking for the names of  
10 individual attendees and checking their responses against the registration list.

11           71. Approximately 400 people attended the event, including about 200  
12 members of the local Jewish community. The sanctuary, which ordinarily seats  
13 nearly 450 individuals, was nearly full.

14           72. Many of those in attendance were young children, including Pastor  
15 Cooper's four children.

16           73. The event opened with prayer by Pastor Menard and worship using  
17 hymns. As part of the worship service, Dr. Wilf provided a discussion of Israel's  
18 religious history and current status.

19                   ***Defendants' Disruption of the March 19 Worship Service***

20           74. Approximately twenty-five minutes after the event started, several  
21 dozen disruptors (the "outside disruptors"), including Defendants Brunner, Hartley,  
22 and Does 1-16, began occupying the sidewalk outside of the Church's front door.

23           75. The front door of the Church is a few feet from the street. It is separated  
24 from the sidewalk by only a small stoop and two steps.

25           76. The sidewalk immediately abuts both the stairs and the street. It is five  
26 feet, 11 inches wide, providing only a narrow pathway from the front door to the  
27 parking lot, without extra space on either side between the church building on one  
28 side and a main roadway on the other.

1 77. The sidewalk is the only direct path from the front door to access the  
2 Church's primary parking lot along the west side of the building. A person leaving  
3 the Church through its front door must immediately turn right and walk down that  
4 sidewalk to reach that lot.



Image 1: The Mission Church sidewalk



Image 2: The Mission Church

27 78. The outside disruptors occupied the sidewalk from outside the front  
28 door along the sidewalk leading to the parking lot on the west side of the building.

1 79. Once in place, the outside disruptors sought to halt the in-progress  
2 event by shouting and drowning out the speaker in the auditorium. The outside  
3 disruptors wielded bullhorns and graphic signs with bloody images of  
4 dismembered children.

5 80. Shouting through bullhorns, the outside disruptors warned the Church  
6 through loud chants including, “Mission Church, you can’t hide! We charge you  
7 with genocide!” They also loudly and falsely accused each individual in the  
8 sanctuary of being “a Nazi” and one of the church officers of being a “F--king  
9 pervert.”

10 81. The outside disruptors were clearly audible to event attendees,  
11 interfering with the worship service inside.

12 82. At one opportunity, Pastor Cooper said to one of the outside disruptors,  
13 “If you’d like to reasonably talk, I would be happy to.” The disruptor responded,  
14 “F--- you! F--- you! There’s nothing to talk about!”

15 83. Defendant Hartley attempted to enter the Church’s front doors while  
16 wearing a large sign, but he was unable to get around the Church’s safety team and  
17 returned to the sidewalk.

18 84. Separate from the outside disruptors, a group of individuals, including  
19 Defendants Turner-Brown, Miller, Pagaduan, Baradar, and Does 17–20 (the  
20 “inside disruptors”), had gained entry to the sanctuary under the false pretense of  
21 being attendees. These Defendants used pseudonyms to pre-register for the event,  
22 posing falsely as guests, as part of a coordinated strategy to intentionally disrupt  
23 the event.

24 85. Once the outside disruptors were clearly audible to attendees, the inside  
25 disruptors began to interfere with the event from the inside. At staggered intervals,  
26 the inside disruptors would stand up, begin screaming epithets at the peaceful  
27 audience, and film individual congregants. The disruptors would not stop shouting  
28 until the Church’s safety team escorted them out.

1 86. Most of the disruptors, including Defendants Turner-Brown and  
2 Pagaduan, physically and forcefully fought removal by kicking and hitting  
3 members of the Church’s safety team. While forcefully resisting, the inside  
4 disruptors continued to shout epithets and to accuse the religious attendees, whom  
5 they were filming, of supporting genocide.

6 87. Each time an inside disruptor individually interfered with the service to  
7 intimidate and obstruct those gathered in worship, Dr. Wilf had to suspend her  
8 planned remarks.

9 88. Because of the inside disruptors’ forceful resistance, multiple members  
10 of the Church’s safety team had to escort each one out of the sanctuary and building.

11 89. The first disruptor was a middle-aged man wearing glasses, Doe 17.

12 90. The second disruptor was a brunette woman wearing a mask, Doe 18.

13 91. The third disruptor was Defendant Miller, who posted a video of herself  
14 on Instagram causing disruption, yelling epithets, and accusing congregants in the  
15 sanctuary of “murder.”



Image 3: Defendant Miller disrupting the service and resisting removal from sanctuary

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1           92. The fourth disruptor was Defendant Pagaduan, who kicked, fought, and  
2 struggled with physical force against the members of the Church’s safety team who  
3 sought to remove him from the sanctuary. Because Pagaduan is trained in martial  
4 arts, several members were needed to restrain and remove him safely. He refused  
5 to walk, so they had to carry him to the church door. Pagaduan injured at least one  
6 worshiper in the sanctuary as he leaped up and sought to disrupt the service,  
7 interfere with the free exercise of worshipers, and intimidate those gathered  
8 peacefully for worship.



18                           Image 4: Defendant Pagaduan resisting removal

19           93. The fifth and sixth disruptors were Does 19–20, both women who  
20 began yelling simultaneously and had to be removed from the Church balcony by  
21 the safety team.

22           94. The seventh disruptor was Defendant Kristina Turner-Brown, who  
23 physically and forcefully fought against removal by kicking and hitting the  
24 Church’s safety team.

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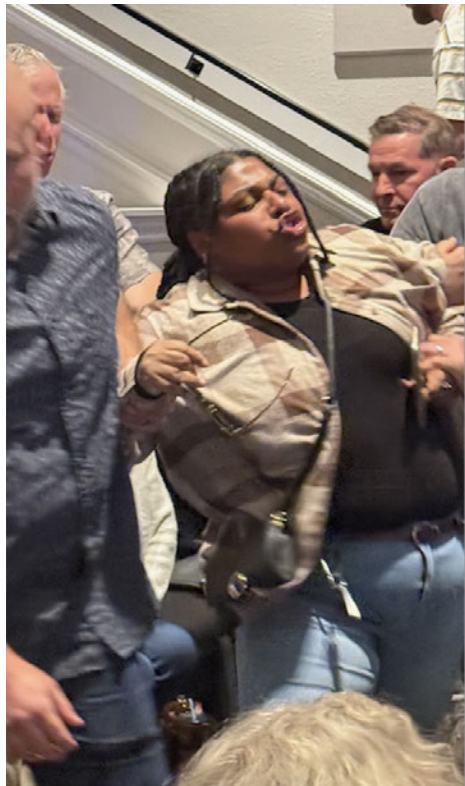


Image 5: Defendant Turner-Brown disrupting the service and resisting removal by throwing a punch

95. The eighth disruptor was Defendant Esmat “Essie” Baradar.

96. Once removed from the Church, each inside disruptor, including Defendants Miller, Pagaduan, Turner-Brown, and Baradar, joined the outside disruptors in seeking to further interfere with the event and intimidate those gathered peacefully for worship.

97. Because of the effectiveness of each disruptor in halting the event and precluding worshipers from hearing Dr. Wilf, the effort required to remove each disruptor, and the timing of disruptions every few minutes throughout the event, Defendants rendered it nearly impossible for Dr. Wilf to present her message to attendees. Those who had come to receive her message and respond in prayer were similarly thwarted.

98. Fearing for their safety and intimidated by the actions of protesters inside and outside the church, several attendees left early, asking the Church’s safety team to escort them to their cars through the narrow back exit.

1 99. Other attendees did not have that luxury, as the Church parking lot  
2 could not accommodate everyone in attendance. Those who parked at the overflow  
3 parking lot across the street and wished to leave early were forced to walk through  
4 a gauntlet of disruptors at the Church's entrance to reach their vehicles.

5 100. The disruptors, including Defendants Brunner, Turner-Brown, Miller,  
6 Pagaduan, Baradar, and Hartley, did not dissipate when the March 19 Worship  
7 Service ended and instead focused on creating an intentionally hostile environment  
8 for the Jewish and Christian congregants attempting to leave the event.

9 101. Approximately twenty-five disruptors, including Defendants Brunner,  
10 Turner-Brown, Miller, Pagaduan, Hartley, Baradar, and Does 1-20, occupied the  
11 narrow sidewalk between the Church's front door and parking lot, obstructing the  
12 only direct path to vehicles.

13 102. The disruptors, including Defendants, intentionally forced congregants  
14 to walk through a phalanx of obstruction and intimidation to reach their cars. The  
15 disruptors did not attempt to occupy the sidewalk space on the east side of the front  
16 door leading away from the parking lot; they focused on blocking congregants'  
17 path toward their cars as they left the Church.

18 103. One of the three police officers who arrived at the Church after  
19 receiving a disturbance call recommended that congregants try to exit through a  
20 narrow back door at the back of the Church, to avoid safety threats by the disruptors  
21 blocking the main entrance. But it was not logistically possible or safe to redirect  
22 several hundred congregants, who were already moving towards the front entrance  
23 of the Church, through that back door.

24 104. In addition to using their bodies, Defendants and other disruptors  
25 wielded signs, wagons, and bins to obstruct the narrow sidewalk between the  
26 Church's front door and the parking lot.

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1 105. Defendants continued to obstruct the sidewalk after a police officer  
2 warned them to cease their obstruction.



Image 6: Defendants Pagaduan and Hartley ignoring commands from a Carlsbad police officer

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13 106. Defendants vehemently screamed at the Jewish and Christian  
14 congregants attempting to leave the event, screaming epithets such as “F--- you!”  
15 and accusing congregants of being “a Nazi” and “Zionists.” Defendants used  
16 bullhorns to maximize the chaos and intimidation.

17 107. Defendant Turner-Brown recorded video of church members and  
18 guests on her phone as they left the event, signaling her intent to disseminate their  
19 identities to others who are hostile to the beliefs of attendees.

20 108. Defendant Turner-Brown intentionally struck one congregant leaving  
21 the event. The police officer witnessed the battery and detained Defendant Turner-  
22 Brown in his vehicle for the remainder of the event.

23 109. Defendants caused significant fear and intimidation to the members and  
24 guests of the Church.

25 110. On information and belief, Defendant Brunner planned and organized  
26 the disruption. Defendant Brunner directed individual disruptors at the event.  
27 Individual disruptors asked Defendant Brunner for guidance on how to proceed  
28 during the disruption.

1 111. Defendant Brunner has also taken a leading role in disruptive protests  
2 across Southern California, including at other houses of worship, Jewish  
3 gatherings, and events supporting Israel, such as an event by The Mission Church  
4 and the Christian & Jewish Alliance on October 20, 2024. He, along with  
5 Defendants Miller and Werth, holds himself out publicly as a leader of the  
6 CODEPINK organization in the San Diego area, which has a pattern of organizing  
7 disruptive protests against Jews and their supporters.

8 ***The Church's Easter Sunday Services***

9 112. Just one month later, on Easter Sunday, the Church joined with billions  
10 of other Christians around the world to celebrate the resurrection of Jesus of  
11 Nazareth, which is the central event in redemptive and Biblical history according  
12 to the Church's sincere religious beliefs.

13 113. The Church hosted three Easter services, welcoming a total of about  
14 1,500 people. This is a significantly higher number than usual attendance.

15 114. The Church planned special events for the children who would attend.  
16 It applied for and received a special permit from the city of Carlsbad to host Easter  
17 activities in their parking lot directly abutting the building, including a bounce  
18 house with a slide and a petting farm with baby chicks that children could hold.

19 ***Defendants' Disruption of the Easter Services***

20 115. At approximately 10:00 a.m., disruptors returned to the Church shortly  
21 after the start of its second service. Several disruptors, including Defendants  
22 Turner-Brown and Hartley, occupied the same space on the sidewalk between the  
23 front door and adjoining parking lot as at the March 19 Worship Service, holding  
24 signs with grotesque images of dead babies and yelling at the children of the church  
25 when they saw them outside.

26 116. Approximately thirty other disruptors, including Defendant Brunner  
27 and Does 21–25, were positioned on the other side of the street directly facing the  
28 Church. These disruptors again used bullhorns for maximum intimidating effect.

1 They screamed obscenities and slurs at the children trying to participate in Easter  
2 activities in the parking lot immediately adjacent to the church building.

3 117. The location of the disruptors was close to the children’s Sunday school  
4 classrooms, and their amplified yelling made it nearly impossible to conduct  
5 children’s classes inside the Church on Easter Sunday.

6 118. Concerned for the safety of church members, guests, and especially the  
7 children, Pastor Cooper contacted local police; a local officer arrived and told the  
8 disruptors to stay across the street.

9 119. Even when moved across the street, the disruptors were less than 60  
10 feet from the children, shouting and screaming through bullhorns for maximum  
11 intimidating effect. Defendants intentionally targeted children who had left the  
12 church building, shouting expletives at them and waving signs with grotesque  
13 images of bloody children.

14 120. The disruptors were also in the pathway between the Church and the  
15 overflow parking lot the Church leased across the street.

16 121. Defendants’ tactics disrupted the service and intimidated congregants,  
17 many of whom had to be escorted to their vehicles by safety officers. There was  
18 no way for church members and guests who had parked at the Church’s overflow  
19 parking on the other side of the street to reach the Church without walking directly  
20 past the hostile disruptors and enduring their vitriolic chants and graphic signs.

21 122. The disruptors continued their disruption through the end of the  
22 Church’s Easter Sunday services.

23 123. Many congregants and other guests who intended to attend the service  
24 left without entering the Church when they saw the Defendants and other  
25 disruptors standing in the path to the front door of the Church.

26 124. In a coordinated effort to intimidate church members and guests about  
27 their Church’s beliefs about Israel as God’s chosen people, the disruptors also  
28

1 placed flyers on 30–50 cars in the Church’s primary parking lot on Easter Sunday  
2 morning accusing the Church and its members of supporting genocide.

3 125. On information and belief, Defendant Brunner planned and organized  
4 the disruption. He directed individual disruptors at the event. Individual disruptors  
5 asked him for guidance on how to proceed during the disruption.

6 ***The September 7 Worship Service***

7 126. On September 7, 2025, the Christian & Jewish Alliance hosted an  
8 interfaith worship gathering at the amphitheater of the Legacy International Center  
9 in San Diego, California. The Center is a Christian religious center in San Diego’s  
10 Mission Valley. It includes an amphitheater that is primarily used for worship,  
11 prayer, and other religious events that require a large outdoor space.

12 127. The Alliance rented the Center’s amphitheater on September 7 for the  
13 purpose of hosting a worship and prayer service.

14 128. The Alliance maintained operational control of the area during on-site  
15 preparation, including bringing in a stage for the event, directing how the area  
16 would be set up, and employing a security team to handle potential threats.

17 129. The Alliance held operational control of the worship service throughout  
18 the event, including setting the schedule, selecting speakers, and designing the  
19 message.

20 130. The purpose of this interfaith gathering was to worship and pray  
21 together about Israel and to enable attendees to better understand how to support  
22 Israel in accordance with their religious beliefs.

23 131. The event opened with a prayer from an Orthodox Rabbi and worship  
24 led by multiple praise bands and gospel choirs from local churches.

25 132. Following worship, several pastors and rabbis from local churches and  
26 synagogues, including Pastor Menard, spoke to attendees and led attending  
27 worshipers in prayer.

28

1 133. The Mission Church sponsored the event along with several other  
2 churches and synagogues. Several dozen members of The Mission Church  
3 attended, and their praise band led the worshipers in song. Pastor Menard spoke  
4 about God’s love for Israel as His chosen people, and he shared how, as a matter  
5 of Biblical faith, religious congregations need to stand together against hatred and  
6 violence.



18 Image 7: Gospel choir leading worship at Alliance event

19 134. Mindful of security concerns based on disruption of previous events,  
20 the Alliance planned carefully and required online registration. They also checked  
21 identification as guests entered the amphitheater space and used a wand metal  
22 detector.

23 ***Defendants’ Disruption of the September 7 Worship Service***

24 135. In response to the disruptions of the March 19 and Easter services, the  
25 Church had retained counsel and sent Defendant Brunner a cease-and-desist letter  
26 in early May 2025.

27 136. Undeterred, Brunner joined with Defendants Turner-Brown, Hartley,  
28 and Miller to target the September 7 worship service for disruption. They were

1 joined by Defendants Aimee Magda Werth, Jonathan Provance, Maya Karalius,  
2 and Does 26–40, as well as several dozen other disruptors.

3 137. According to Defendant Werth, their group chose to target this event  
4 because the attendees were “in there, feasting, listening to music, and raising  
5 money for genocide . . . . [W]e will not give them a moment of peace. Free  
6 Palestine.”

7 138. The September 7 Service was neither a feast nor a fundraiser. It was an  
8 interfaith worship event, marred irreparably by hostile disruptors.

9 139. Defendants’ plan for disruption and intimidation proceeded in two  
10 phases: (1) obstructing and deterring attendees from reaching the event and  
11 (2) interfering with the program itself.

12 140. Defendants and other disruptors arrived long before the event started  
13 and intentionally occupied the road to block both entrances to the venue and then  
14 obstruct individuals from attending the event.

15 141. Defendants and other disruptors fully blocked one of two entrances to  
16 the venue parking lots, funneling the vehicles into the only other entrance.

17 142. Defendants and other disruptors partially blocked the other entrance by  
18 occupying the street. This blockage forced guests to drive very slowly to enter the  
19 property. Disruptors walked directly in front of and behind guests’ cars, yelling  
20 through bullhorns statements such as, “Zionists, you’re not welcome here!,” “Go  
21 back to Israel!,” “Zionism is Naziism!,” “You are a Nazi!,” and “You are a baby  
22 killer!”

23 143. As Mastron attempted to enter into the parking lot to the venue with her  
24 husband in their small compact car, they were confronted by a group of protesters  
25 in the driveway. Doe 26, a pink-haired woman wearing a full black face mask,  
26 leaped onto the hood of Mastron’s car and began slamming her fist on the  
27 windshield while screaming at Mastron and her husband. Mastron’s husband rolled  
28

1 slowly into a nearby parking spot, leading Doe 26 to jump off of their hood and  
2 run back to the crowd of disruptors.

3 144. As another guest was slowly rolling her car into the parking lot, with  
4 the tail end still in the street, several disruptors ran in front of her car and  
5 surrounded it, and another disruptor slammed his hand on the back of the member’s  
6 car and cursed at her.



Image 9: Disruptor with a bullhorn.

17 145. Another church member, also obstructed from accessing the event by  
18 disruptors, rolled down her car window as she slowly tried to enter; several  
19 disruptors leaned into her vehicle window and yelled, “Christians kill babies!” to  
20 dissuade her from entering the event.

21 146. Multiple other attendees faced obstruction, as Defendants and other  
22 disruptors surrounded their cars, screamed at them, and blocked their ability to  
23 move forward.

24 147. Defendant Jonathan Provance walked close to guests’ cars, filming  
25 them with his phone to intimidate them.

26 148. Two children’s dolls were laid on the path so that cars would have to  
27 run over them to enter. Disruptors walked directly in front of and behind guests’  
28

1 cars, yelling “Shame on you! You have blood on your hands too!” through  
2 bullhorns.

3 149. Many guests who were planning to attend drove away out of fear when  
4 they saw the disruptors blocking the entrances and obstructing access to the event.  
5 Due to the obstruction and intimidation, the number of persons who ultimately  
6 made it to the service was far less than the number of pre-registered guests.



Image 8: Disruptors obstructing the driveway of Legacy.

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17 150. Attendees who managed to park their vehicles then faced further  
18 obstruction and harassment from Defendants, who occupied the sidewalk directly  
19 between the parking area and the venue and harassed attendees as they attempted  
20 to walk into the event.

21 151. Doe 26 carried a sign stating, “Only C---s Support Israel.” Defendant  
22 Werth carried a sign that said “FCK NZIS” featuring a swastika combined with a  
23 star of David, and other Defendants carried signs stating, “Zionism is the evil cult  
24 built on Christian white supremacy and antisemitism” and “America Funds Israel’s  
25 Genocide.”

26 152. The disruptors also scrawled hostile messages in chalk on the sidewalk  
27 along the entrance to the event, private driveway, and outer wall of the event venue,  
28

1 including “Baby Killers,” “Death 2 Israel,” “F--- Israel,” and “Zionists for  
2 Genocide.” They also vandalized the private property of Legacy International  
3 Center.

4 153. Defendant Miller, in particular, sought to block attendees’ path towards  
5 the event, crowding them off the sidewalk onto a busy street and screaming at them  
6 at point-blank range with a megaphone.

7 154. Once the event began, Defendants and other disruptors shifted towards  
8 preventing worshipers from hearing the service, effectively denying access to the  
9 event.

10 155. Defendants and other disruptors lined up along the back of the  
11 amphitheater, about 30 feet from the guests trying to pray and worship, and about  
12 10 feet from members of the Church’s safety team.



Image 10: Disruptors in close proximity to worshipers during the service

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22 156. For more than three hours—nearly the entire event—Defendants  
23 Brunner, Werth, Miller, Turner-Brown, Hartley, Provance, Karalius, Does 21–30,  
24 along with other disruptors, blared sirens imitating emergency vehicles and banged  
25 pots and pans, preventing worshipers from hearing and participating fully in the  
26 service. The purpose and effect were to disrupt the event and intimidate worshipers.

27 157. Defendants Brunner, Werth, Provance, and Baradar also used bullhorns  
28 to lead chants criticizing guests for their religious views and calling them “liars.”

1 158. Defendants’ noise drowned out the service for a large portion of  
2 attendees. Many fled to a nearby building to seek shelter from the noise. Several  
3 senior citizens were forced to take out their hearing aids, which precluded them  
4 from hearing the event entirely. They remained only to show solidarity at the event.

5 159. Defendants’ hours-long sonic assault caused ongoing physical harm to  
6 event attendees and participants due to the dangerous noise levels Defendants  
7 produced. Several guests’ ears continued ringing the next day. Defendants  
8 intended to cause this physical harm: They protected themselves from this harm  
9 by wearing ear protection throughout the event, and they never provided attendees  
10 any such notice to allow them to do the same.

11 160. Fearing for their own safety and the safety of all other attendees,  
12 worshipers called the police to seek protection. The police told callers that they  
13 “don’t enforce noise ordinances.”

14 161. When an officer finally arrived and witnessed the scene, he was not  
15 able to effectively intervene due to the chaos. He instead called for backup.

16 162. A police presence was established only midway through the event, and  
17 that did not stop the blaring sirens or aggressive disruptions.

18 163. The disruptors interfered with at least three worshipers’ ability to safely  
19 exit the event. After the event, Cohen-Reeis was walking toward the exit with two  
20 of the event speakers, and a four-door white BMW car began aggressively driving  
21 toward them. The three changed course and stepped inside the lobby of the Legacy  
22 International Center, asking an armed security guard to escort them to their cars  
23 for safety.

24 ***Defendants’ Continued Intimidation and Targeting of Event Attendees***

25 164. Defendants have had no remorse over their actions and the damage they  
26 caused. To the contrary, they expressed pride at their civil rights violations and  
27 continued their intimidation online, targeting individual worshipers for retaliation.  
28

1 165. The day after his disruption of the Church’s Easter Services, Defendant  
2 Brunner contacted Pastor Menard and threatened to return on Mother’s Day,  
3 calling it “another wonderful occasion when folks who normally do not attend  
4 show up. Any special plans that day?”

5 166. Pastor Menard responded, “[I]f you ever want to have a genuine  
6 conversation, the offer stands. Until then, please leave us alone. What you are  
7 doing is not free speech - it is just harassment. If it happens again, we will take  
8 legal action against you. But I hope for better things. If you really care about  
9 making a positive difference in the world - let’s move on to greater good.”

10 167. The Church continued to fear intimidation, interference, and  
11 obstruction from these hostile disruptors. For the safety of its members, the Church,  
12 as noted, retained counsel and sent Defendant Brunner a cease-and-desist letter  
13 regarding any interference with the Church’s Mother’s Day services. *See supra*  
14 ¶ 135. At least one disruptor did show up on Mother’s Day, but left when he saw  
15 that others had not come.

16 168. The letter did not dissuade Brunner or any other Defendant from  
17 continuing to disrupt the Church’s events, as reflected by the disruption of the  
18 September 7 Service.

19 169. The day after the September 7 worship service, Defendants Werth and  
20 Brunner posted videos boasting about their actions. Defendant Brunner  
21 (@charismaticelisha) posted, “Go live in Israel. We’re fine here without that Israeli  
22 baggage and cost to our country. PARIAH,” and Defendant Werth  
23 (@resistthepropaganda) added, “How does it feel to go on record as a supporter of  
24 a holocaust of children?”

25 170. Several Defendants and other disruptors posted photos of Jewish and  
26 Christian worshipers to expose their identities, open them up to further attack, and  
27 intimidate them from exercising their religious beliefs in support of the Nation of  
28 Israel.

1 171. Another disruptor (@awesomefridge) posted next to a photo of a  
2 Christian worshiper at the September 7 event, “this guy works as security at the  
3 mission church of Carlsbad.”



17 Image 12: Instagram post on Sept. 7 targeting a member of the Church safety team

18 172. Defendant Maya Karalius (@mayapapaya66) posted about one Jewish  
19 worshiper, saying he was “wearing the black leather arm Tefillin and head Totafot  
20 tradition of Orthodox Jew Tradition.”  
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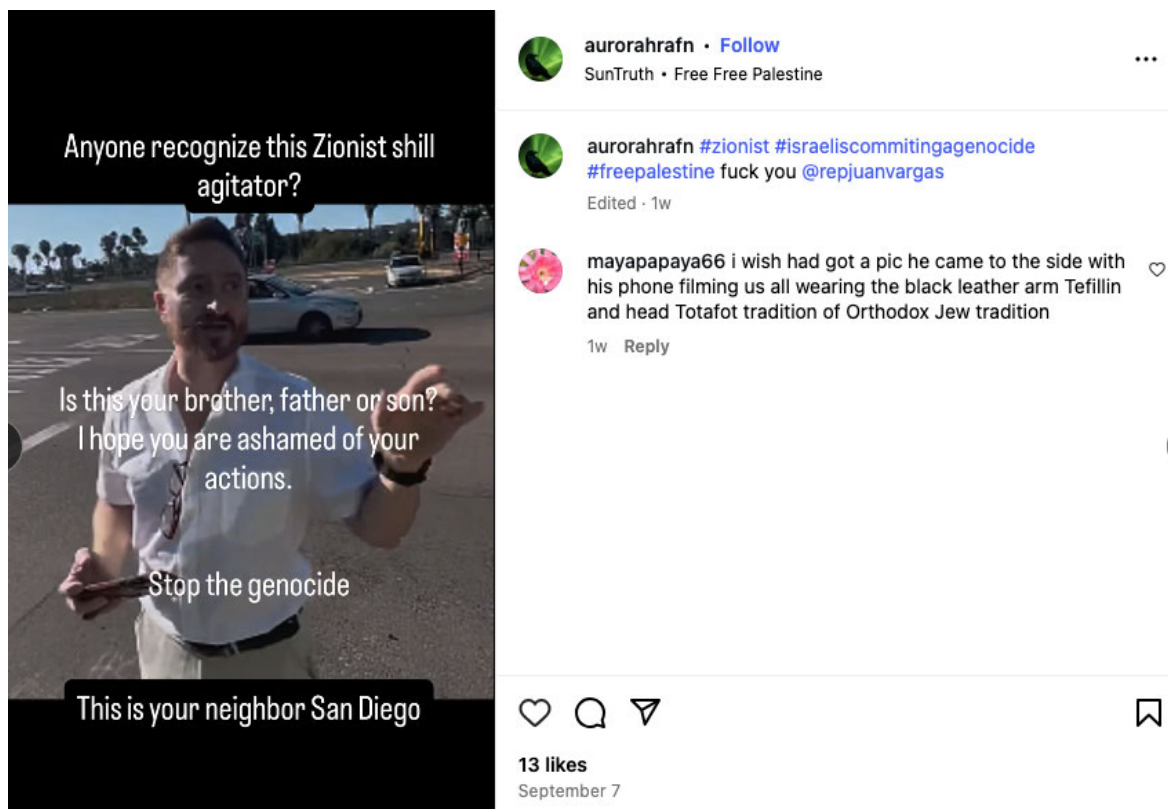


Image 13: Instagram post on Sept. 7 targeting a Jewish worshiper

173. Defendants have harassed other attendees through social media, targeting worshipers’ businesses and personal lives to dissuade them from adhering to their religious convictions to support Israel.

174. Since October 2024, Defendant Brunner and the other Defendants have shown a consistent pattern and practice of targeting The Mission Church, the Christian & Jewish Alliance, and similar organizations because of their shared religious beliefs supporting Israel.

175. On August 25, 2025, Defendant Brunner and several other individuals shouted epithets outside a different church in San Diego, challenging the church’s religious beliefs about Israel. As he bragged in a video posted on social media, “we’re challenging church members to ask their pastors...what is Christian Zionism? What is Christian Nationalism? What do they mean by ‘what would Jesus do?’”

1 176. On September 14, 2025, Defendant Brunner posted the following  
2 image:



Image 14: Social media post by Daniel Brunner

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10 177. On September 28, 2025, Defendant Brunner posted a video of himself  
11 saying, “We’re doing our part to fight the war against Zionism, which is an  
12 abomination that says that some people are less human than other people. It uses  
13 forms of terror and starvation . . . We ain’t shuttin’ up and we ain’t goin’ nowhere.  
14 We’re going to keep fighting.”

15 178. On September 29, 2025, Defendant Werth posted a video of herself and  
16 Defendant Brunner as CODEPINK leaders recruiting new disruptors. Defendant  
17 Werth said, “every time we come out here, we have new comrades that are joining  
18 us,” and Defendant Brunner encouraged viewers to “look us up...it’s all about the  
19 numbers right now.”

20 ***The Lingering Effects of Defendants’ Unlawful Interference***

21 179. As a result of the ongoing intimidation, interference, and obstruction of  
22 religious exercise at the Church and other places of worship that Defendants  
23 caused, the Church has cancelled events that were intended to support the local  
24 Jewish community.

25 180. On March 25, one week after the March 19 Worship Service, the  
26 Church had planned to host a movie screening of *October 8*, a documentary about  
27 the persecution of Jews worldwide. Because of the Church’s reasonable fear of  
28 further hostile disruption from the Defendants, and fears for the safety of its own

1 members and the Jewish guests that members would invite, the Church made the  
2 difficult decision to cancel this event.

3 181. The Church has lost members because of the intimidation, interference,  
4 and obstruction that Defendants caused on March 19 and Easter.

5 182. Defendants' actions have created an environment of fear among the  
6 Church and its remaining congregants, who remain on edge when attending events  
7 at the Church. On one Sunday soon after the disruption of the March 19 Service, a  
8 bottle dropping on the floor of the Sanctuary caused severe distress to congregants  
9 due to the loud noise it made.

10 183. The Church has had to expend additional resources and effort on  
11 security since the disruptions, training additional members of the safety team and  
12 purchasing equipment in anticipation of future disruption.

13 184. The cities of Carlsbad and San Diego have likewise spent significant  
14 resources due to the threat of future disruptions by Defendants. Multiple officers  
15 were necessary to escort guests to safety following the March 19 Service. An  
16 officer was necessary to protect the Church's congregants during and after the  
17 Easter services. And due to Defendant Brunner's Mother's Day threat, the City  
18 deployed twenty additional police officers downtown to patrol the area and spent  
19 significant resources preparing for disruptions. Multiple San Diego police officers  
20 were called to the September 7 event and were needed to physically remove the  
21 trespassing disruptors from private property (though they returned to trespassing  
22 soon after the police left).

23 185. The Church's pastors are committed to supporting Israel, but due to  
24 ongoing and escalating attacks on places of worship, they are concerned about the  
25 safety of their members and guests if they continue hosting events.

26 186. Because it cannot find a safe venue to host these events, the Alliance  
27 cannot safely further its religious mission of bringing Jewish and Christian  
28 congregations together to exercise their religious belief to support Israel.

1 **FIRST CLAIM FOR RELIEF**

2 **VIOLATIONS OF THE FACE ACT (18 U.S.C. § 248)**

3 187. Plaintiffs hereby incorporate and re-allege paragraphs 1–186.

4 188. The FACE Act imposes civil liability on anyone who “by force or threat  
5 of force or by physical obstruction, intentionally injures, intimidates or interferes  
6 with or attempts to injure, intimidate or interfere with any person lawfully  
7 exercising or seeking to exercise the First Amendment right of religious freedom  
8 at a place of religious worship.” 18 U.S.C. § 248(a)(2).

9 189. Defendants’ disruption of each worship service was motivated by the  
10 religious nature of the event and the Jewish and Christian identities of the  
11 worshipers.

12 190. Defendants’ actions reflect a pattern of targeting the Church and the  
13 Alliance because of their religious beliefs, seeking to interfere with and prevent  
14 their religious gatherings.

15 ***The March 19 Worship Service***

16 191. Defendants Brunner, Miller, Turner-Brown, Hartley, Pagaduan,  
17 Baradar, and Does 1-20 intentionally used force, threats of force, and physical  
18 obstruction to intentionally interfere with egress from the Church and access to the  
19 Church’s parking lot following the March 19 Worship Service.

20 192. The Church has an actionable claim against these individuals for their  
21 actions on March 19.

22 193. By physically occupying the narrow sidewalk, Defendants Brunner,  
23 Miller, Turner-Brown, Hartley, Pagaduan, Baradar, and Does 1-20 intentionally  
24 rendered passage to the Church unreasonably difficult, causing late arrivals to the  
25 Worship Service to leave without attempting to enter the Church.

26 194. By physically occupying the narrow sidewalk, blockading access to the  
27 parking lot, and creating a hostile environment through their repeated disruptions  
28 of the event, Defendants Brunner, Miller, Turner-Brown, Hartley, Pagaduan,

1 Baradar, and Does 1-20 intentionally intimidated attendees to leave the event early  
2 through a narrow rear entrance from the Church.

3 195. By obstructing egress from the Church and access to the Church's  
4 parking lot following the Worship Service, Defendants Brunner, Miller, Turner-  
5 Brown, Hartley, Pagaduan, Baradar, and Does 1-20 intentionally sought to  
6 interfere with attendees' free exercise of religion and to intimidate attendees from  
7 attending future events at the Church.

8 196. By forcefully resisting removal from the Sanctuary, Defendants  
9 Turner-Brown, Miller, Pagaduan, Baradar, and Does 17-20 intentionally used  
10 force to injure and attempt to injure congregants and attendees of the Worship  
11 Service for exercising their religious beliefs.

12 197. By striking congregants seeking to leave the event, Defendant Turner-  
13 Brown intentionally used force to injure and attempt to injure attendees of the  
14 Worship Service for exercising their religious beliefs.

15 198. By forcefully resisting removal from the Sanctuary while filming  
16 congregants and accusing them of being Nazis, perverts, and proponents of  
17 genocide, Defendants Turner-Brown, Miller, Pagaduan, Baradar, and Does 17-20  
18 intentionally sought to intimidate attendees of the Worship Service against  
19 exercising their religious freedom by attending future events at the Church or  
20 openly adhering to their beliefs regarding Israel.

21 199. Defendants Brunner, Werth, Miller, Turner-Brown, Hartley, Provance,  
22 Karalius, and Does 1-20 are jointly and severally liable for the FACE Act violation  
23 in relation to the March 19 Worship Service.

24 ***The Easter Worship Service***

25 200. Defendants Brunner, Turner-Brown, Hartley, and Does 21-25  
26 intentionally used physical obstruction to intentionally interfere with access to and  
27 egress from the Church and its parking lots during and following the Church's  
28 Easter Services.

1 201. The Church has an actionable claim against these individuals for their  
2 actions on Easter Sunday.

3 202. By occupying the space of the narrow sidewalk between the Church’s  
4 front doors and parking lot during the Church’s Easter services, Defendants  
5 Turner-Brown and Hartley intentionally sought to obstruct egress from the Church  
6 and ingress to the events the Church had set up for children in the parking lot.

7 203. By occupying the pathway between the Church and its overflow  
8 parking lot across the street, Defendants Brunner, Turner-Brown, Hartley, and  
9 Does 21–25 intentionally sought to obstruct access to and from the Church for  
10 congregants and attendees during the Church’s Easter services.

11 204. Defendants Brunner, Turner-Brown, Hartley, and Does 21-25 are  
12 jointly and severally liable for the FACE Act violation in relation to the Easter  
13 Worship Service.

14 ***The September 7 Worship Service***

15 205. Defendants Brunner, Werth, Miller, Turner-Brown, Hartley, Provance,  
16 Karalius, and Does 26–30 intentionally used force, threats of force, and physical  
17 obstruction to intentionally interfere with ingress to and egress from the worship  
18 venue for the interfaith event hosted that the Christian & Jewish Alliance hosted  
19 and Mastron attended.

20 206. The Alliance and Mastron have actionable claims against these  
21 individuals for their actions on September 7.

22 207. By surrounding guests’ cars while yelling hostile epithets, physically  
23 striking and jumping on cars in a show of force, blocking the main entrance to the  
24 venue, and partially blocking the side entrance to the venue, Defendants Brunner,  
25 Werth, Miller, Turner-Brown, Hartley, Provance, Karalius, and Does 26–40 used  
26 force and physical obstruction to interfere with the ability of worshipers, including  
27 Mastron, to attend the event and exercise their religious freedom.  
28



1           216. On March 19, 2025, the Church gave limited consent to enter its  
2 property to individuals who registered by name and only for the purpose of  
3 attending the March 19 Worship Service as audience members.

4           217. Defendants Turner-Brown, Pagaduan, Baradar, and Does 17–20 each  
5 entered the Church’s property by deceiving the Church, intentionally providing  
6 false names.

7           218. The Church was not aware that Defendants Turner-Brown, Pagaduan,  
8 Baradar, and Does 17–20 had provided false names when they entered Church  
9 property.

10           219. On information and belief, Defendant Miller registered twice, as  
11 “Sasha Spite” and “Sasha Miller,” gaining entry for another disruptor under false  
12 pretenses.

13           220. Defendants Turner-Brown, Pagaduan, Miller, Baradar, and Does 17–  
14 20 each intentionally entered the Church’s property for purposes other than to  
15 attend the March 19 Worship Service as audience members.

16           221. The Church was not aware that Defendants Turner-Brown, Pagaduan,  
17 Miller, Baradar, and Does 17–20 had entered Church property for purposes other  
18 than to attend the March 19 Worship Service as worshipers.

19           222. Deception aside, Defendants Turner-Brown, Miller, Pagaduan,  
20 Baradar, and Does 17–20 each exceeded the scope of the Church’s consent for  
21 individuals to enter its property as attendees of the March 19 Worship Service  
22 when they intentionally began loudly disrupting the event.

23           223. Reflecting this exceeding of consent, Church safety team members  
24 quickly sought to remove Defendants Turner-Brown, Miller, Baradar, and Does  
25 17–20 after each began disrupting the event.

26           224. Despite seeing that previous disruptors had been escorted off the  
27 property, Defendants Turner-Brown, Miller, Pagaduan, Baradar, and Does 18–20  
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1 continued the disruption in excess of any consent the Church provided to audience  
2 members.

3 225. After the Church informed Defendants Turner-Brown, Miller,  
4 Pagaduan, and Does 17–20 that they were no longer welcome on Church property,  
5 Defendants Turner-Brown, Miller, Pagaduan, Baradar, and Does 17–20  
6 intentionally and affirmatively refused to leave the Church’s property.

7 226. Defendants Turner-Brown, Miller, Pagaduan, Baradar, and Does 17–  
8 20 continued to resist agents of the Church who sought to remove them peacefully  
9 from the property.

10 227. Defendants Turner-Brown, Miller, Pagaduan, Baradar, and Does 17–  
11 20 harmed the Church through decreased membership, the cancellation of events  
12 focused on Israel, and increased security costs due to their trespass.

13 228. Defendants Turner-Brown, Miller, Pagaduan, Baradar, and Does 17–  
14 20 are jointly and severally liable for each trespass committed because they formed  
15 a civil conspiracy to trespass on the Church, acted in furtherance of that conspiracy,  
16 and damaged the Church as a result.

17 229. Defendant Brunner is liable for each alleged trespass because he joined  
18 and acted in furtherance of the civil conspiracy to trespass and because he aided  
19 and abetted the actions of Defendants Turner-Brown, Miller, Pagaduan, Baradar,  
20 and Does 17–20.

21 230. Defendant Brunner planned, organized, and coordinated the disruption  
22 of the March 19 Worship Service, including the sequential individual disruptions  
23 by Defendants Turner-Brown, Miller, Pagaduan, Baradar, and Does 17–20 to  
24 maximize disruption of the March 19 Worship Service.

25 231. On information and belief, Defendant Brunner informed Defendants  
26 Turner-Brown, Miller, Pagaduan, Baradar, and Does 17–20 of the March 19  
27 Worship Service and instructed them how to obtain access to the March 19  
28 Worship Service and when to disrupt the event.

1 232. Defendant Brunner acted to facilitate the intentional trespass by  
2 Defendants Turner-Brown, Miller, Pagaduan, Baradar, and Does 17–20.

3 233. When trespassing, conspiring to trespass, and facilitating trespass, each  
4 Defendant acted with malicious disregard of the rights of the Church and event  
5 attendees and with an intent to injure and annoy the Church and event attendees.

6 **JURY DEMAND**

7 Plaintiffs request a trial by jury of all issues so triable.

8 **PRAYER FOR RELIEF**

9 Plaintiffs respectfully request that the Court:

10 a. Enter judgment declaring that Defendants violated the FACE Act;

11 b. Enter judgment declaring that Defendants Turner-Brown, Miller, Pagaduan,  
12 Baradar, and Does 17–20 trespassed on the Church’s property;

13 c. Enter judgment declaring that Defendant Brunner aided and abetted the  
14 trespass by Defendants Turner-Brown, Miller, Pagaduan, Baradar, and Does 17–  
15 20;

16 d. Enter judgment permanently enjoining Defendants from obstructing access to  
17 the Church, from entering the Church without advance permission from the Church,  
18 from knowingly seeking to intimidate members of the Church from attending  
19 religious events at the Church, and from future violations of the FACE Act against  
20 the Church or its congregants;

21 e. Enter judgment permanently enjoining Defendants from obstructing access to  
22 religious events hosted by the Alliance at places of worship, from knowingly  
23 seeking to intimidate members of the Alliance from attending religious events at  
24 places of worship, and from future violations of the FACE Act against the Alliance  
25 or its members;

26 f. Enter judgment permanently enjoining Defendants or their agents from  
27 participating in or promoting any demonstration within 500 feet of the Church or  
28 an Alliance event;

- 1 g. Award appropriate relief to Plaintiffs under 18 U.S.C. § 248(c)(1)(B);
- 2 h. Award compensatory damages under 18 U.S.C. § 248(c)(1)(B) and/or Cal.
- 3 Civ. Code § 3333;
- 4 i. Award punitive damages to Plaintiffs under 18 U.S.C. § 248(c)(1)(B) and Cal.
- 5 Civ. Code § 3294;
- 6 j. Award attorneys’ fees, expert witness fees, and costs under 18 U.S.C.
- 7 § 248(c)(1)(B) and Cal. Civ. Proc. Code § 1021.5; and
- 8 k. Award any such other relief as the Court may deem just and proper.

9  
10 Dated: November 4, 2025

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 13 John C. Brinkerhoff Jr.\*  
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Respectfully submitted,  
 /s *David J. Hacker*  
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19 \* *pro hac vice forthcoming*

20 Attorneys for Plaintiffs Christian and Jewish Alliance Inc., Ezra Ministries, and  
21 Ruth Mastron