

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

CHARLES M. MURRELL III,
Plaintiff,

v.

PATRIOT FRONT, THOMAS ROUSSEAU,
AND JOHN DOES 1-99,
Defendants.

Civil No. _____

Jury Trial Demanded

COMPLAINT

For his Complaint, plaintiff Charles M. Murrell III (“Mr. Murrell”) alleges against the defendants Patriot Front, Thomas Rousseau, and John Does 1-99 (collectively, “Defendants”) as follows:

INTRODUCTION

1. This action arises out of a coordinated, brutal, and racially motivated attack committed on the streets of Boston, Massachusetts by members of the white supremacist organization Patriot Front against Mr. Murrell, an unarmed black man.

2. On July 2, 2022, dozens of white men descended on Boston, Massachusetts to participate in a meticulously planned Patriot Front “flash” march along the federally protected Freedom Trail. Dressed in matching clothing—the now infamous white supremacist uniform of khaki pants, polo shirts, hats, and face coverings—the men marched in unison under banners displaying the words “RECLAIM AMERICA” and flags depicting fascist imagery. And as in other Patriot Front “flash” marches that erupted in violence, many of the participants carried silver, rectangular metal shields as they walked down Boston’s streets in lockstep formation.

3. Following a brief stop at the Boston Public Library—at which Patriot Front’s leader, Thomas Rousseau, gave a speech expressing his view that, among other things, the public could not both be “safe” and retain “liberty”—Patriot Front’s members encountered Mr. Murrell on the sidewalk. Mr. Murrell had no advance knowledge of the group’s presence in Boston; rather, he encountered the mob as he was heading to a location near the Boston Public Library to perform music on his saxophone.

4. Almost immediately, members of Patriot Front surrounded Mr. Murrell. Using tactics that Patriot Front members had practiced at training sessions preceding their Boston “flash” march, Patriot Front members then began to beat Mr. Murrell with their metal shields, eventually pressing him against a concrete pole and knocking him to the ground. From there, the beating continued, with Patriot Front’s members using their shields, fists, and feet to further inflict harm on Mr. Murrell.

5. As a result of this beating, Mr. Murrell sustained physical injuries to his face, head, and hand, all of which required medical attention. Mr. Murrell also continues to suffer significant emotional distress to this day as a result of the incident. Among other harms, those physical and emotional injuries have adversely affected Mr. Murrell’s ability to earn a living as a musician.

6. What happened to Mr. Murrell was no accident. For years, Patriot Front—an organization designated as a hate group by the Southern Poverty Law Center—has publicly and privately advocated for the use of violence against those who disagree with its express goal of creating an entirely “white” United States. And for years, under the leadership of Thomas Rousseau, Patriot Front has trained its members to commit acts of violence against its perceived opponents. Indeed, video footage created by Patriot Front that came to light in early 2022 shows

Patriot Front's members practicing using their shields in concert to harm innocent bystanders in the exact manner that Patriot Front members used them against Mr. Murrell on July 2, 2022.

7. Patriot Front's demonstrations in Boston were racially motivated and the product of considerable planning and coordination. Patriot Front members who marched along Boston's Freedom Trail and in the shadow of historic Boston buildings and landmarks were primed and ready to commit acts of violence against any perceived opponents that crossed their path. Mr. Murrell happened upon the mob of Patriot Front members on the sidewalk in Back Bay on July 2, 2022, where he became a victim of their hate.

8. By engaging in coordinated, pre-planned, and racially motivated violence against Mr. Murrell, Patriot Front, its leader Thomas Rousseau, and its members violated the rights and privileges guaranteed to Mr. Murrell by the laws of the United States of America and the Commonwealth of Massachusetts. Mr. Murrell brings this action to recover all the damages he sustained and continues to sustain as a result of Defendants' repugnant and illegal conduct, as well as to punish Defendants for that conduct, thereby serving notice that their racially charged violence will not be tolerated.

PARTIES

9. Plaintiff Charles M. Murrell III is an African American musician, composer, and civil rights activist who resides in Massachusetts. Mr. Murrell often wears clothes inspired by his heritage and art and wears his hair in a dreadloc style.

10. Defendant Patriot Front has been categorized by the Southern Poverty Law Center as a "white nationalist hate group that broke off from Vanguard America in the aftermath of the deadly 'Unite the Right' rally in Charlottesville, Virginia[.]" According to the Anti-Defamation League, "Patriot Front falls into the alt right segment of the white supremacist movement but

presents itself as a ‘patriotic’ nationalist group.” Upon information and belief, Patriot Front is an unincorporated association that is based in Texas but has members across the United States. As an unincorporated association, Patriot Front has the capacity to “be sued in its common name to enforce a substantive right existing under the United States Constitution or laws” pursuant to Federal Rule of Civil Procedure 17(b)(3)(A).

11. Defendant Thomas Rousseau is an individual who resides in Texas, and is the leader of Patriot Front. Rousseau organized, planned, and led Patriot Front’s march through Boston on July 2, 2022, and he was part of the mob of Patriot Front members who attacked Mr. Murrell. Unlike most of his confederates, Rousseau did not cover his face.

12. Defendants John Does 1-99 are the masked and presently unidentified individuals who planned and participated in Patriot Front’s July 2, 2022 march through Boston, including those individuals who attacked Mr. Murrell. Mr. Murrell will seek their identities through discovery and, should one or more responsible individuals be identified, Mr. Murrell will amend his Complaint accordingly.

JURISDICTION AND VENUE

13. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1331 because Mr. Murrell brings a claim pursuant to 42 U.S.C. § 1985. This court has supplemental jurisdiction over the state law claims alleged herein pursuant to 28 U.S.C. § 1367.

14. This Court has personal jurisdiction over Defendants because they willingly came to Massachusetts for their demonstrations and the attack on Mr. Murrell occurred in Boston.

15. Venue is proper in this district pursuant to 28 U.S.C. § 1391.

FACTS

16. The attack on Mr. Murrell perpetrated by Patriot Front and its members on the streets of Boston on July 2, 2022, was not a spontaneous incident. Instead, the tactics deployed

by Patriot Front against Mr. Murrell on that date—including using their shields to beat Mr. Murrell after Patriot Front identified him as someone who disagreed with their message of white supremacy—were only the latest instance of Patriot Front’s systematic and coordinated efforts to commit acts of violence against individuals because of their race, all in furtherance of their stated goal of advancing their white supremacist agenda in the United States.

A. Patriot Front Is the “Rebranded” Name for Vanguard America, An Organization That Engaged In Coordinated, Racially-Motivated Violence While Under Defendant Rousseau’s Leadership.

17. Patriot Front evolved from Vanguard America, one of the white supremacist groups responsible for the deadly acts of racial violence committed in Charlottesville, Virginia, in August 2017. Although separate entities, both organizations were led by Thomas Rousseau, shared a common mission, and had a significant overlap in membership.

18. On August 11 and 12, 2017, approximately 600 individuals descended upon Charlottesville, Virginia, to participate in a “Unite the Right” rally. Those participants represented approximately 50 different extreme-right movements, groups, and entities, all of which are part of the broader “white supremacist” movement. One of those groups was Vanguard America.

19. Vanguard America was a white supremacist group founded in 2015 that opposed multiculturalism and believed that the United States of America should be an exclusively white nation. Vanguard America’s manifesto (as of 2018) made that view point explicit: “The racial stock of this nation was created for white Christian Anglo/Europeans by white Christian Anglo/Europeans. All other ethnicities, religions and demographics are absolutely not compatible with this nation’s original culture. With such being stated, a mass exodus, isolation, apartheid, segregation and/or separation must be implemented to retain the good order and longevity of the country.”

20. In furtherance of its viewpoint that the United States of America should be an exclusively white nation, Vanguard America adopted the slogan “Blood and Soil.” That slogan—repeatedly chanted by attendees of the Unite the Right rally in Charlottesville—verbalizes the philosophy, which originated in Germany (as “Blut und Boden”) and was popularized by Hitler’s regime, that people with “white blood” have a special bond with their home soil, in this case, America’s.

21. At the time of the Unite the Right rally, Defendant Thomas Rousseau acted as the leader of Vanguard America’s Texas chapter. In the months leading up to the rally, however, Rousseau took multiple steps to assume de facto control over Vanguard America. On or around June 20, 2017, for example, Defendant Rousseau staged a takeover of Vanguard America’s servers and its website, bloodandsoil.org. Moreover, the dozens of Vanguard America members who arrived in Charlottesville on August 11, 2017, did so under the leadership of Defendant Thomas Rousseau.

22. Led by Thomas Rousseau, the members of Vanguard America arrived in Charlottesville on August 11, 2017 prepared for, and with the express intent to, commit acts of violence motivated by racial animus.

23. For instance, members were instructed to wear matching khaki pants and white polo shirts, which members liked because “it’s a good fighting uniform.”

24. Rousseau was involved in these instructions, as he communicated about a “gear list” in advance of the rally and acknowledged that some of his fellow Vanguard America members would be armed with concealed carry weapons.

25. The Vanguard America members also came armed with shields, many of which bore a Vanguard America logo. Vanguard America also made twenty extra shields to give to rally attendees who had not brought their own.

26. And members of Vanguard America did, in fact, proceed to commit horrific, and in one case, fatal, acts of violence, all under the leadership of Rousseau.

27. On August 12, 2017, for instance, Vanguard America members, dressed in matching khaki pants and polo shirts, marched in Charlottesville during the Unite the Right rally while carrying matching shields and flags. While marching, the Vanguard America members chanted their slogan, "Blood and Soil!"

28. When Vanguard America members encountered individuals who they deemed to be in their way and/or antithetical to their cause, they deployed coordinated tactics in which they used their shields to break through them.

29. Those tactics are substantially similar to those practiced by Patriot Front and ultimately deployed against Mr. Murrell.

30. Moreover, on August 12, 2017, during the Unite the Right rally, an individual named James Fields plowed his car into a group of counter-protestors, killing a woman named Heather Heyer and injuring 19 others. Fields was subsequently convicted for murder in the first degree, three counts of malicious wounding, five counts of aggravated malicious wounding, and one count of leaving the scene of an accident. Fields and a number of codefendants, including Vanguard America, were also sued in a civil action by the individuals injured in this incident. In November 2021, a jury found the defendants liable for conspiracy to engage in violence and related claims under Virginia law.

31. Prior to committing murder, James Fields was photographed donning the khaki pants and white polo uniform that Vanguard America members had been instructed to wear, and holding a shield bearing Vanguard America's logo. That photograph is below (Fields is the individual in the middle).



32. In another photograph taken before James Fields committed murder, Thomas Rousseau (left) is seen standing next to James Fields (right). Both individuals are seen wearing white polo shirts, and James Fields is depicted holding a shield with Vanguard America's logo. That photograph is below.



33. In the aftermath of the racial violence committed in Charlottesville, Thomas Rousseau and other likeminded Vanguard America members sought to solidify their hold on the ground by rebranding it with a new name. On August 30, 2017—just 18 days after the Unite the Right rally—Rousseau posted a message announcing the formation of a new group, called “Patriot Front.”

34. But despite that new name, Rousseau made clear that the overarching goals and conduct of the organization would remain the same as those held and deployed by Vanguard America. Specifically, Rousseau wrote: “Due to the unwillingness to meet any semblance of a compromise to resolve ongoing disputes with disagreeing parties, we are rebranding and reorganizing as a new entity. **Vanguard America, as you know it, will now be the ‘Patriots Front.’** Our website is under construction, and will be back online via the same domain. **Our focus will remain much the same, as will our overall [sic] goals,** this restructuring will happen alongside the creation of an extended manifesto, and a top-down reform of the entity’s ranking system.” (Emphasis added)

35. Rousseau further explained that he chose the new name “Patriot Front” because it allowed the organization to hide its blatantly white nationalist views under the guise of “patriotism.” As he wrote in the same August 30 post: “The new name was carefully chosen, as it serves several purposes. It can help inspire sympathy among those more inclined to fence-sitting, and can be easily justified to our ideology [sic] and worldview. The original American patriots were nothing short of revolutionaries. The word patriot itself comes from the same root as paternal and patriarch. It means loyalty to something intrinsically based in blood.”

36. As the Southern Poverty Law Center put it, Rousseau’s August 30, 2017 announcement confirmed that Patriot Front’s “rebranding was aesthetic, not ideological. The group’s politics remain staunchly white nationalist, albeit less explicitly.”

37. After announcing the creation of Patriot Front, Rousseau rebranded Vanguard America’s website from “bloodandsoil.org” to its current iteration, “patriotfront.us.” This current iteration is housed on the same domain that once belonged to Vanguard America.

38. Vanguard America members subsequently migrated to and became members of Patriot Front, including multiple individuals who had attended the “Unite the Right” rally under the Vanguard America umbrella.

39. As of the end of 2021, Patriot Front counted between 200 and 300 members in its ranks. All of those members operate under the leadership and strict control of the group’s leader, Thomas Rousseau.

B. Like Vanguard America, Patriot Front Seeks to Fulfill Its White Supremacist Goals by Routinely Engaging in the Coordinated and Racially Motivated Violence.

40. Since its rebranding in 2017, Patriot Front, through its leader Thomas Rousseau and its members, have strived to achieve the vision articulated by Thomas Rousseau in his August 30, 2017 announcement: namely, to operate with the same “focus” and “overall[] goals”

of white supremacy in the United States previously held Vanguard America. Two aspects of that continued focus are of particular relevance here: (1) Patriot Front's stated goal of denying individuals of different races, national origin, or creed the rights and privileges afforded by the United States Constitution, and (2) Patriot Front's willingness to use organized violence to further its white supremacist aims.

1. Like Vanguard America, Patriot Front's Mission Is to Form a "New" America as a White "Ethno-state."

41. Now operating under the name "Patriot Front," Thomas Rousseau and his co-conspirators maintained Vanguard America's goal of creating an exclusively white United States of America. That goal is apparent from Patriot Front's manifesto and the conduct of its members.

42. Patriot Front's manifesto, published on its website, expresses the organization's belief that only the descendants of white European immigrants are "true" Americans, and that any individuals who lack that background are the "enemy." The manifesto states: "When our pre-Columbian forefathers left their European homes, they found a savage continent. They held a variety of purpose, yet against the harsh life on the frontier and the common enemy in the strange and unexplored reaches of America yet to be touched by civilization, they found a common cause and a common identity as Americans. From the varied nations and cultures of Europe a new nation was forged in the flames of conquest. E Pluribus Unum was the new creed that bound our people together with their pan-European identity as Americans. **To be an American is to be a descendant of conquerors, pioneers, visionaries, and explorers. This unique identity was given to us by our ancestors, and this national spirit remains firmly rooted in our blood.**" (Emphasis added).

43. Patriot Front’s manifesto further states that any individual who lacks such “pan-European” blood cannot be considered a true American, regardless of their legal status. “Those of foreign birth may occupy civil status within the lands occupied by the state, and they may even be dutiful citizens, yet they may not be American. **Membership within the American nation is inherited through blood, not ink. Even those born in America may yet be foreign.** Nationhood cannot be bestowed upon those who are not of the founding stock of our people, and those who do not share the common spirit that permeates our greater civilization, and the European diaspora.” (Emphasis added).

44. Earlier versions of Patriot Front’s manifesto were even more explicit in their exclusion of people of color from its conception of pan-European identity, and thus, “[m]embership within the American nation.” For instance, Patriot Front’s manifesto previously stated: “An African, for example, may have lived, worked, and even been classed as a citizen in America for centuries, yet he is not American. He is, as he likely prefers to be labelled, an African in America. The same rule applies to others who are not founding stock of our people as well as to those who do not share the common unconscious that permeates throughout our greater civilization, and the European diaspora.”

45. Patriot Front’s manifesto views the presence of non-white individuals in America as an existential threat to the country. The manifesto states: “The nation will see the thin veneer of civilization begin to wane as the current plutocracy diverts the toils of Americans to extranational masses. The same population that has been imported to supersede the nation will then be enslaved upon our ashes. Those of our people in witness to this orchestrated tragedy will be compelled towards the only body whose vision of the future includes them.”

46. To avoid that purported existential threat, the manifesto calls its members to participate in a “revolution” aimed at creating an entirely white United States, and strongly implies that violence may be necessary to carry out that goal. For instance, the manifesto prominently features the following quote from Charles Lindbergh: “We can have peace and security only so long as we band together to preserve the most priceless possession, our inheritance of European blood, only so long as we guard ourselves against attack by foreign armies and dilution by foreign races.” The manifesto elsewhere states: “Democracy has failed this once great nation. The resurgence of the American Spirit will bring with it the death of tyranny. The torch of revolution has been lit.” And the manifesto states: “Our mission is a hard reset of the nation we see today—a return to the traditions and virtues of our forefathers.”

47. Patriot Front’s members promulgate the organization’s hateful, white supremacist mission by distributing propaganda with the intent to intimidate people of color and defacing property and billboards associated with or containing messaging antithetical to Patriot Front’s mission.

48. In March 2018, for instance, groups of homeowners in the Candler Park neighborhood of Northwest Atlanta—an area known for being one of “the most progressive areas of the metro, a place where people take pride in being inclusive”—discovered that flyers had been posted overnight in front of each home by Patriot Front. Each flyer took “aim at what it labels a ‘migrant underclass.’” Recipients of the flyers viewed them as a “threat,” with one resident stating: “I feel like it’s a threat, to say, ‘We’re here.’”

49. On June 4, 2021, Patriot Front members defaced a mural of George Floyd located at the intersection of 5th Street and Olney Avenue in Philadelphia, Pennsylvania with white paint

and spray painted stencils of various Patriot Front logos and insignia over what remained of the artwork.



50. Also in June 2021, a statue of George Floyd located on Flatbush Avenue in Brooklyn, New York, was discovered by police officers to be covered with black spray paint and marked with a stencil for Patriot Front. The statue had been unveiled one week earlier in celebration of the Juneteenth holiday.

51. On or around the same day that the George Floyd statue in Brooklyn, New York was found vandalized, another George Floyd statue located at city hall in Newark, New Jersey, was also found to be defaced by Patriot Front. The face of the statue had been painted black, and there were white words painted on its torso referring to Patriot Front.

52. On or around October 21, 2021, a tunnel containing a mural of black tennis legend Arthur Ashe located in Richmond, Virginia was vandalized. The image of Arthur Ashe had been covered in white paint, with Patriot Front symbols tagged on top as well as inside the tunnels on excerpts of Ashe's life. Video footage released in 2022 showed Nathaniel J. Noyce and Thomas Dail, two members of Patriot Front, defacing the mural with spray paint and celebrating its destruction.



53. Thomas Rousseau and Patriot Front revel in this destruction and the public attention it generates. For example, a video posted by Patriot Front on March 14, 2022, entitled “Unstoppable: 2019-2022 Activism Retrospective,” begins with news reports highlighting the defacement of the public monuments by Patriot Front, and ends with footage of Patriot Front members draping a banner over a “Black Lives Matter billboard.” The banner reads “The United States Is No Longer of America Now We Are on Our Own Patriotfront.us.”

54. Patriot Front’s members also seek to promulgate their white supremacist views by participating in what Patriot Front calls “flash demonstrations” in various cities around the United States, at which members show up unannounced and without having applied for a city permit, and proceed to march in formation on public streets.

55. While these flash demonstrations are not publicly announced in advance, they are highly organized affairs, with significant planning and coordination carried out by Patriot Front’s members beforehand. For example, in advance of a flash demonstration planned for Washington, D.C., members of Patriot Front created a detailed, 11-page internal document that outlined every step of the march, including vehicle pick-up and drop-off spots, the route for the planned march, the location of “shield crossings,” the location for a speech to be delivered by Thomas Rousseau, and contingencies for exiting the city.

56. Patriot Front members generally wear matching khaki pants and a blue or white polo shirt during these marches. As discussed further below, Patriot Front members also frequently bear matching shields as well as flags with Patriot Front’s logo or other white supremacist imagery.

57. Patriot Front members also routinely chant the slogan “Blood and Soil” during marches. As alleged above, that slogan originated in Nazi Germany and signifies Patriot Front’s

belief that, as white individuals of pan-European descent, they share a special bond with American soil that gives them an ownership right over America not shared by others.

58. Core components of Patriot Front’s “flash demonstrations” include speeches by Thomas Rousseau that reiterate Patriot Front’s white supremacist beliefs and goals, as well as coordinated photo ops that are then converted into online content.

59. Recent “flash demonstrations” by Patriot Front that possessed some or all of the characteristics described above include: a July 7, 2021 march in Philadelphia; a December 4, 2021 march in Washington, D.C.; the July 2, 2022 march in Boston, Massachusetts that is the subject of this lawsuit; and a September 3, 2022 march in Indianapolis, Indiana.

60. All of the above activities—including the dissemination of intimidating propaganda, vandalism of statues to George Floyd and Black Lives Matter billboards, and public marches in major United States cities—are done at the express direction of, and with the express approval of, Patriot Front’s leader, Thomas Rousseau.

61. Indeed, Rousseau and other leaders instruct Patriot Front members that if they fail to participate in the organization’s various activities and otherwise fail to engage in activism that can be posted on Patriot Front’s social media outlets, they will be removed from the group.

62. For example, in advance of the December 4, 2021 march in Washington, D.C., a leader of Patriot Front wrote in the group’s Rocket.chat¹ to an individual named “Michael”: “It has come to our attention that you do not wish to attend the upcoming event in December. You are obligated by membership in this organization to attend the demos, unless a valid excuse is

¹ According to its website, Rocket.Chat is a communications platform that allows its users to customize its offerings to their security and privacy desires. *See* <https://www.rocket.chat/>.

given. Simply wishing not to attend is not a valid excuse. If you have any issues, get them resolved or you can talk to Thomas.”

2. As With Vanguard America, Organized Violence Is a Central Component of Patriot Front’s Pursuit of Its White Supremacist Goals.

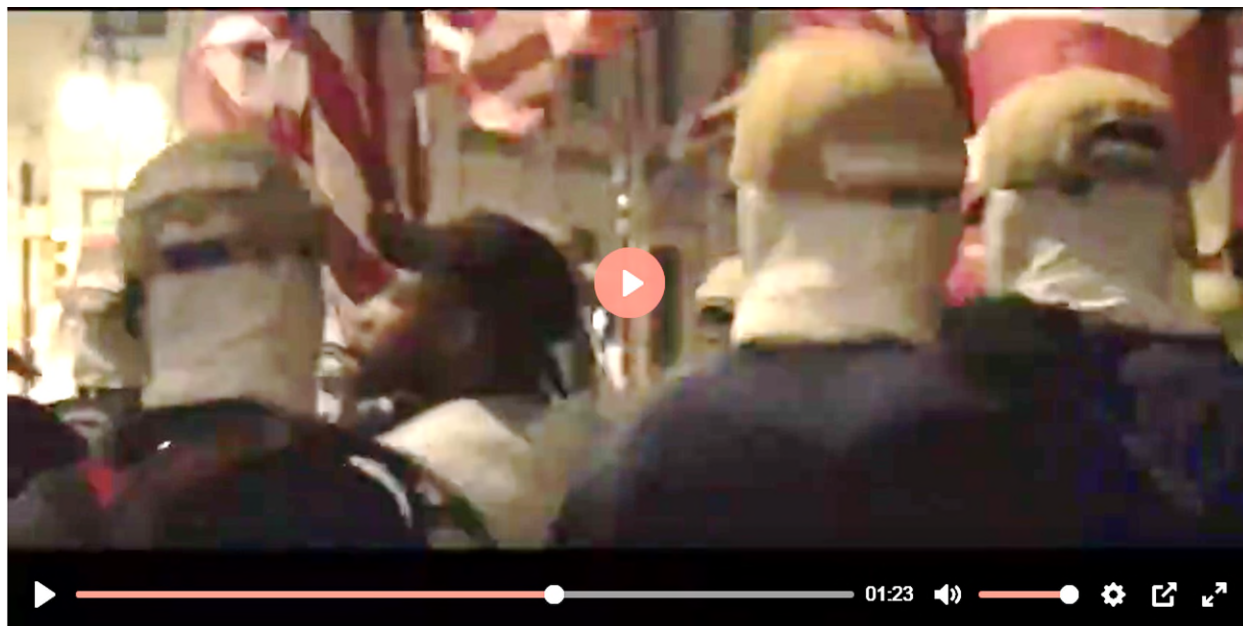
63. As Patriot Front’s own materials reflect, organized violence is a central component to carrying out the organization’s white supremacist goals. That is apparent from (a) the organization’s rhetoric and promotional materials, (b) the training it provides to its members to prepare for violent encounters, and (c) acts of violence committed by Patriot Front members in public.

a. Violence Is Frequently Featured in Patriot Front’s Public and Private Messaging.

64. Patriot Front’s official website and social media accounts frequently promote violence—including against people of color.

65. For example, a video posted by Patriot Front on March 14, 2022, entitled “Unstoppable: 2019-2022 Activism Retrospective,” contains a montage of Patriot Front members engaging in violent clashes with members of the public and law enforcement at various “flash demonstrations” conducted by the group.

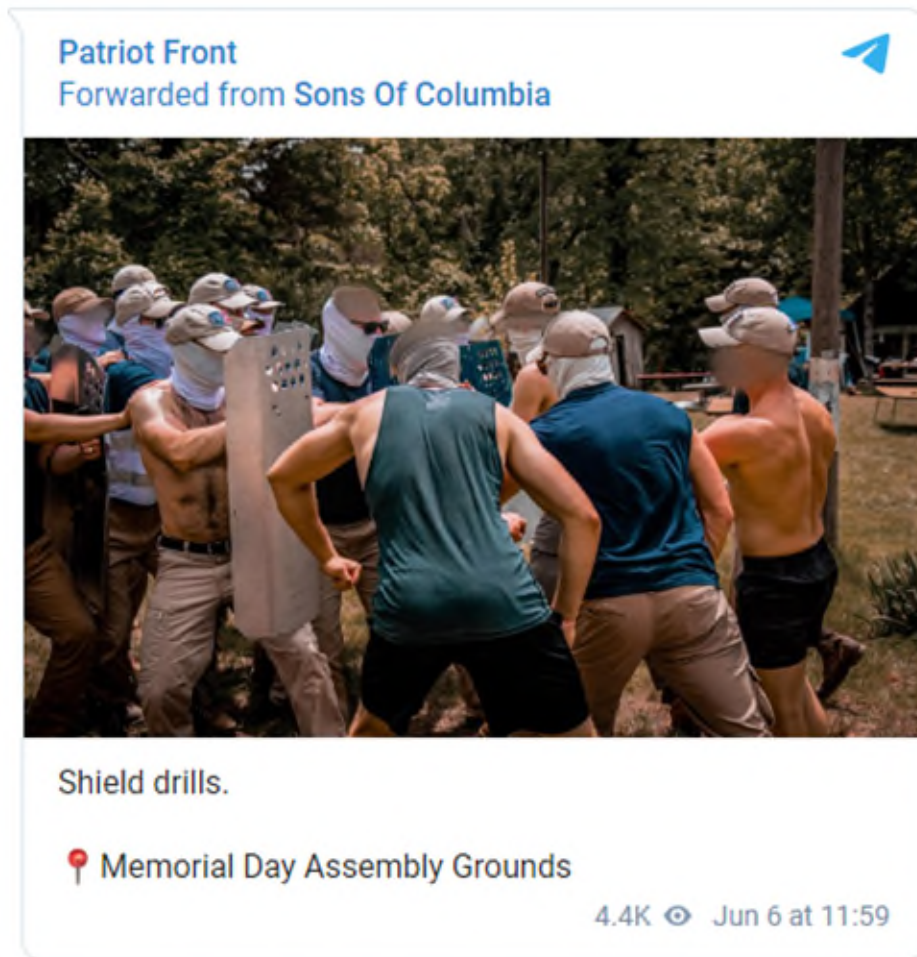
66. During one frame of this montage, Patriot Front members—each wearing the organization’s signature blue polo, white head cover, and khaki uniform—are shown surrounding and then pushing and shoving a black man during a march.



67. In another frame, the video shows a black man with what appears to be blood on his shirt while Patriot Front members—again wearing their signature uniform—march past.



68. Patriot Front also frequently posts images of its members training for violent confrontations. The below image posted on Patriot Front’s Telegram page, for example, shows Patriot Front members engaging in “Shield drills.”



69. In addition to imagery, Patriot Front also posts audio content confirming that the organization expects violence to erupt at its public flash demonstrations. For example, in a June 23, 2022 post—posted just days before Patriot Front’s march in Boston in which Patriot Front members committed acts of violence against Mr. Murrell—Patriot Front posted an interview of Thomas Rousseau in which he explained “why its important to do public demonstrations, **and why its worth risking personal safety.**” (emphasis added).

70. The internal communications of Patriot Front’s members, too, are saturated with endorsements of violence.

71. For example, in recorded conversations revealed by the media outlet *Unicorn Riot*, Patriot Front members are heard saying that raping women is acceptable “as long as you’re

raping, like, people in your own race” and describing how in their ideal society, “ethnstate rape gangs” would be allowed to freely target unmarried white women who did not adhere to “traditional values.”

72. Similarly, Patriot Front Discord chats revealed by *Unicorn Riot* show that Patriot Front members frequently share images of themselves engaged in what they casually refer to as “violence training.”

b. Patriot Front Prepares Its Members to Use Shields to Engage in Violence.

73. Patriot Front does not just talk about violence. Rather, it actively prepares for it by coaching its members in shield formations and other tactics that it can later deploy during its public marches.

74. An example of such coaching is found in a video produced by Patriot Front, entitled “Drilling Instruction,” released in October 2021.

75. The October 2021 video shows Thomas Rousseau and other Patriot Front leaders teaching Patriot Front members how to utilize shields in an organized fashion when marching as a group. Segments of the video include “Shields lockstep formation,” “Shields moving as a Section,” “Shields cycling as a row,” and “Shields cycling as a column.”

76. The shield tactics taught in the October 2021 video were utilized by members of Patriot Front during the July 2, 2022 flash demonstration in Boston, Massachusetts. Moreover, the shields that Patriot Front members are depicted using in the October 2021 video are silver and rectangular with a series of holes present at the top—the same type used by members of Patriot front during the July 2, 2022 flash demonstration in Boston, Massachusetts.

77. Two other videos revealed by *Unicorn Riot* show members of Patriot Front training to use their shields to batter individuals who are perceived to be in the way of Patriot Front during a march.

78. Specifically, one video depicts Patriot Front members dressed in matching khaki pants, blue jackets, and khaki hats holding shields emblazoned with a matching red, white, and blue logo. With one member simulating the role of a bystander, the Patriot Front members practice using their shields to prevent the individual from passing them, including by hitting the individual with their shields. While the Patriot Front members engage in this exercise, one member yells: “Don’t let him pass!”

79. The shield tactics practiced in the above-referenced video were utilized by members of Patriot Front against Mr. Murrell during the July 2, 2022 flash demonstration in Boston, Massachusetts.

80. In another video, Patriot Front members are depicted encountering multiple bystanders. The Patriot Front members again practice surrounding these individuals and hitting them with their shields. They also practice responding to an individual attempting to wrestle away one of their shields. In response to that attempt, the uniformed Patriot Front members encircle the individual and hit him with their shields.

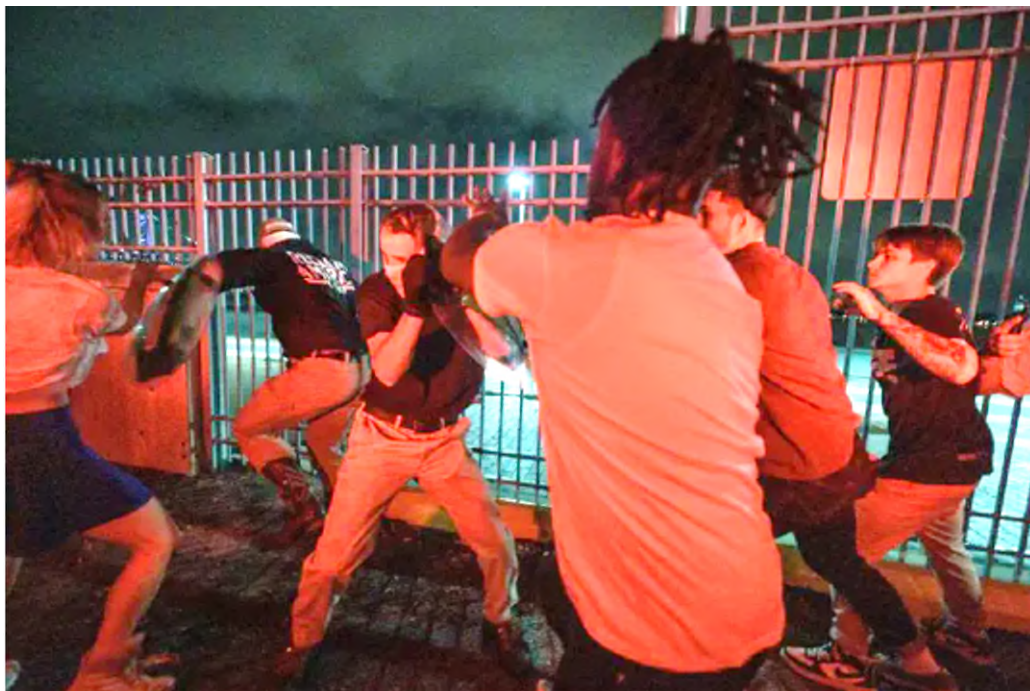
81. The shield tactics practiced in the above-referenced video were utilized by members of Patriot Front against Mr. Murrell during the July 2, 2022 flash demonstration in Boston, Massachusetts.

c. Like Vanguard America, Patriot Front Uses Organized Violence to Pursue Its White Supremacist Goals.

82. Patriot Front’s members deploy the battlefield tactics they train upon against actual people who they encounter during their “flash” demonstrations.

83. For example, during the July 3, 2021 flash demonstration held in Philadelphia, Pennsylvania, *NBC News* reported that Patriot Front members were seen using smoke bombs and “hitting people.”

84. Consistent with that report, a photograph from the July 3, 2021 flash demonstration in Philadelphia shows a Patriot Front member using his shield to hit a bystander.



85. Another photograph from the July 3, 2021 flash demonstration in Philadelphia similarly shows a Patriot Front member wielding his shield against an African-American individual.



86. Upon information and belief, the shield tactics used in the above images are of the same type that were the subject of the training videos discussed in Part B(2)(b), *supra*.

87. Patriot Front itself publicly touted this violence. Indeed, violence is an integral part of the recruitment and mobilization strategy for its members. For example, in the March 14, 2022 Patriot Front video entitled “Unstoppable: 2019-2022 Activism Retrospective,” at approximately the 1:21 mark, members of Patriot Front are depicted using their shields to hit a bystander. In that same video, at approximately the 1:22 mark, members of Patriot Front are depicted using their shields to encircle and attack an African American man.

88. Patriot Front members also reveled in the racially motivated violence they committed in Philadelphia. For instance, on November 3, 2021 a user of the anonymous forum 4chan (using the anonymized user tag “ID:+YDF/A9u”) made a series of posts showing that user’s activities with Patriot Front. When discussing the July 3, 2021 Philadelphia march, this user wrote: “Cute story. The [n word] who started all that shit ended up bloody.” In the same thread, that same user wrote: “The [n word] in that picture got fcked up and bloodied.” And still

later in the thread, the user wrote: “He started it, we (the shield team) ended it and the whole time the men kept marching.”

89. And in June 2022, just one month before their flash demonstration in Boston, Massachusetts, Thomas Rousseau and more than two dozen other Patriot Front members traveled to Coeur d’Alene, Idaho with the purpose of engaging in violent rioting at the community’s weekend Pride festival.

90. Specifically, on June 11, 2022, approximately 20 Patriot Front members were seen loading into a U-Haul truck in a hotel parking lot. According to an eyewitness account reported by NPR.org, the members were “wearing masks, carrying shields,” and otherwise “looked like a little army.”

91. The Patriot Front members in the U-Haul wore Patriot Front’s signature uniform: khakis, navy blue shirts, beige shirts, and white balaclavas covering their faces. The individuals also wore arm patches and logos on their hats that identified them as members of Patriot Front.

92. Police subsequently found at least one smoke grenade in the U-Haul truck, as well shin guards and shields. Police also found paperwork that appeared to show a master plan to riot both at the Pride event and along the main commercial strip of downtown Coeur d’Alene. According to a report in the *Washington Post*, that documentation was “similar to an operations plan that a police or military group would put together for an event.”

93. Upon information and belief, the detailed planning discovered by authorities in Idaho is akin to preparations Patriot Front made before other demonstrations, including in Washington, D.C. and Boston, Massachusetts.

94. Thomas Rousseau and 30 other members of Patriot Front were subsequently arrested by the authorities and were each charged with one count of criminal conspiracy to riot.

95. On July 21, 2023, a jury found five members of Patriot Front guilty of conspiring to riot. One other individual pled guilty to disturbing the peace. Trial proceedings against the remaining charged defendants, including Thomas Rousseau, remain ongoing.

C. Patriot Front’s March on Boston.

1. From Haymarket to Back Bay.

96. Patriot Front began planning for a demonstration on or around Independence Day 2022 at least as far back as December 10, 2021. During a national meeting on December 10, 2021, which followed a recent demonstration, Defendant Thomas Rousseau informed the group that “we will be doing something for Independence Day [in 2022] Let there be no doubt we will be doing something on Independence Day or the otherwise nearest weekend. So obviously it’s quite early, but plan to be available.”

97. On June 8, 2022, Defendant Rousseau again highlighted the weekend of July 4, 2022 as a date on which members of Patriot Front were expected to be available. On that date, Patriot Front released a video on its Telegram social media page of its members engaging in “training,” which, according to Patriot Front’s post, “included boxing and grappling tournaments, drilling, physical training, workshops, seminars, and presentations.” The video footage shows Patriot Front members holding metal shields akin to those wielded by Patriot Front’s members on July 2, 2022.

98. The video footage also depicts Thomas Rousseau watching Patriot Front’s members train and stating: “You will have the chance to push yourself to the point of failure today and tomorrow, and you’ll be expected to do so. **You will receive no such lenience if you reach failure in the presence of our enemies on Independence Day.**” (Emphasis added).

99. Upon information and belief, just as they did in advance of their “flash” march in Washington, D.C. and their planned riot in Coeur d’Alene, Idaho, Patriot Front, Rousseau, and

Patriot Front’s members formulated detailed plans for a “flash” demonstration to take place on July 2, 2022 in Boston.

100. Defendants agreed in advance of July 2, 2022 that, as they had in prior “flash demonstrations” in Washington, D.C. and Philadelphia, Patriot Front’s members would descend upon Boston armed with shields—the same shields that Patriot Front’s members had specifically trained to use to batter individuals who disagreed with their white supremacist agenda.

101. Consistent with these plans, on July 2, 2022, the Saturday before the Independence Day holiday, a group of approximately 100 Patriot Front members, including Defendant Rousseau, arrived in Boston, Massachusetts to partake in a “flash demonstration.” After assembling, Patriot Front’s members paraded through downtown Boston carrying shields, banners displaying the words “Reclaim America,” and a wide variety of flags, some of which depicted well-known Mussolini-era fascist imagery. At least one Patriot Front member carried a snare drum and played a military-style cadence to set a tempo while the group marched through the city.

Patriot Front Marches Through Boston Common²



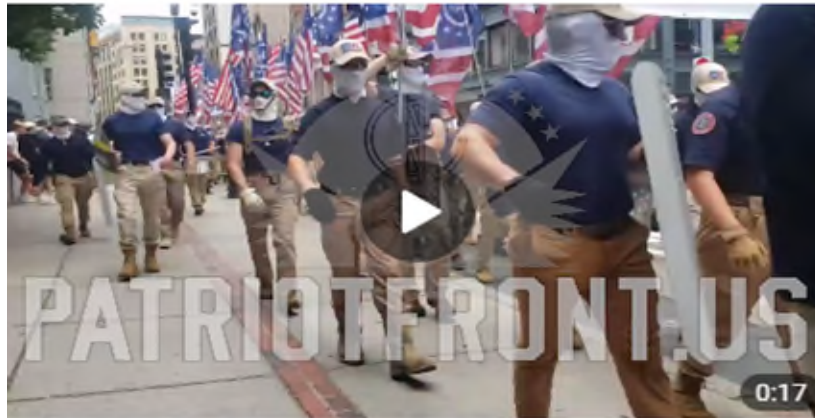
Patriot Front demonstrators march through Boston Common on July 2. (Michael Dwyer/AP)

102. The men dressed uniformly, khaki pants and navy or dark-colored shirts, and, except for Defendant Rousseau, they all wore cloth coverings, sunglasses, and baseball hats to hide their faces.

² This image appears in an article published in the Boston Globe on July 12, 2022, available here: <https://www.bostonglobe.com/2022/07/12/metro/white-nationalists-increase-attempts-recruit-new-england/>

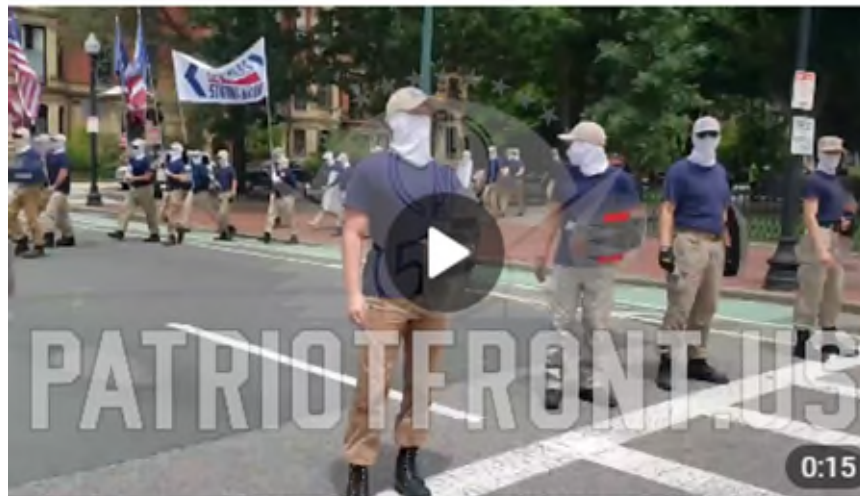
Screenshots of Videos from July 2, 2022 Posted on Patriot Front's Telegram Page

Patriot Front
Forwarded from Patriot Front Videos



LIVE UPDATE: #PatriotFront activists are currently marching in Boston, MA in recognition of Independence Day. 11.1K 👁 16:55

Patriot Front
Forwarded from Patriot Front Videos



LIVE UPDATE: #PatriotFront activists are currently marching in Boston, MA in recognition of Independence Day. 11.8K 👁 16:55

Patriot Front
Forwarded from Patriot Front Videos



LIVE UPDATE: #PatriotFront activists are currently marching in Boston, MA in recognition of Independence Day. 12.5K 16:55

103. According to eye witnesses and news reports, the group's demonstrations began when, sometime before 12:30 p.m. on July 2, 2022, a large group of Patriot Front members approached a rental truck parked near the Haymarket T stop and unloaded shields bearing the Patriot Front emblem and a number of different flags. Those flags included: flags bearing the Patriot Front emblem, U.S. flags, some of which were flown upside down, flags with 13 stars representing the original U.S. colonies, and flags displaying symbols associated with Benito Mussolini's National Facist Party.

104. The march loosely followed Boston's Freedom Trail for about 2 miles, with stops in front of the Old State House and the Boston Public Library.

105. The Boston Freeom Trail is an approximately 2.5 mile long trail that passes by historical structures and properties significant to the histroy of the United States. Many of those sites (and the land therein) are part of a National Historical Park of the United States pursuant to the Boston National Historical Park Act of 1974. *See* 16 U.S.C. § 410z; *see also* Public Law 93-

431, 88 Stat. 1184. Pursuant to that Act, the Boston National Historical Park is administered by the Secretary of the Interior in accordance with the laws of the United States. *See* 16 U.S.C. § 410z-4.

106. During their stops in front of the Old State House and the Boston Public Library, Patriot Front members distributed flyers and shouted hateful rhetoric through a bullhorn. While in front of the Boston Public Library, Defendant Thomas Rousseau was quoted stating, among other things, “[i]f you truly wish for safety, you will have it. But you can take nothing else with you . . . Not your home, not your family, not your liberty. There you will be alone with your safety in a rotted world.”³

Images From July 2, 2022 Posted on Patriot Front’s Telegram Page

Patriot Front



³ This quote comes from an article published in the Boston Herald, available here: <https://www.bostonherald.com/2022/07/02/white-supremacist-group-the-patriot-front-reportedly-marching-through-boston/>



2. The Patriot Front Mob Attacks Mr. Murrell.

107. While marching away from the Boston Public Library, Patriot Front and its members encountered Mr. Murrell near the intersection of Dartmouth Street and Stuart Street in Boston's Back Bay neighborhood.

108. At the time of their encounter, Mr. Murrell had been traveling on foot from the Back Bay T Station to perform Bach on his saxophone near the Boston Public Library. As part of those travels, Mr. Murrell had traversed near and/or across various federal, state, and/or local public highways and other thoroughfares.

109. Mr. Murrell had no prior knowledge that the Patriot Front mob would be in Boston that day. But when he saw throngs of masked individuals traveling toward him and carrying shields, signs and flags, he reached for his phone to record the scene.

110. Before he had a chance to begin recording, however, Mr. Murrell heard one of the masked men utter a derogatory and racist remark. While Mr. Murrell was unfamiliar with the man's terminology (he believes the word "tar" was used), he instantly understood from the

man's tone and the reference to "tar" that he was being targeted due to his race. The masked and shield-wielding mob then yelled, together, "DO NOT BREAK OUR RANKS," and quickly surrounded Mr. Murrell.

111. As the mob surrounded Mr. Murrell, Defendant Thomas Rousseau yelled, "RIGHT SCREEN!" Upon information and belief, "right screen" is a command that instructs specific members of Patriot Front's shield guard to begin using their shields in a violent manner.

112. Using their shields, a number of Patriot Front members began shoving Mr. Murrell on the sidewalk. When Mr. Murrell tried to protect himself, all while telling the men to stop pushing him and move along, a large number of the Patriot Front mob jumped in and pressed Mr. Murrell up against a concrete light post, knocked him to the ground, and continuously hit and kicked him. The assault continued in this manner for several minutes until law enforcement intervened.

113. The attack on Mr. Murrell was captured by members of the press and public, as the following images reflect.

Patriot Front Attacks Mr. Murrell⁴



⁴ The following images appear in articles published in the Boston Herald and Boston Globe, available here: <https://www.bostonherald.com/2022/07/02/white-supremacist-group-the-patriot-front-reportedly-marching-through-boston/>, and <https://www.bostonglobe.com/2022/07/23/metro/far-right-patriot-front-is-getting-bigger-more-visible-new-england/>

114. The shield tactics used by Patriot Front's members to batter Mr. Murrell are the same tactics that Patriot Front's members trained to use against bystanders they encounter while marching, as described in detail *supra* Section B.2.

115. After law enforcement broke up the attack at around 1:30 p.m., the Patriot Front members loaded their materials back into the rental truck, which other members had moved near Back Bay Station, and decamped via the T.

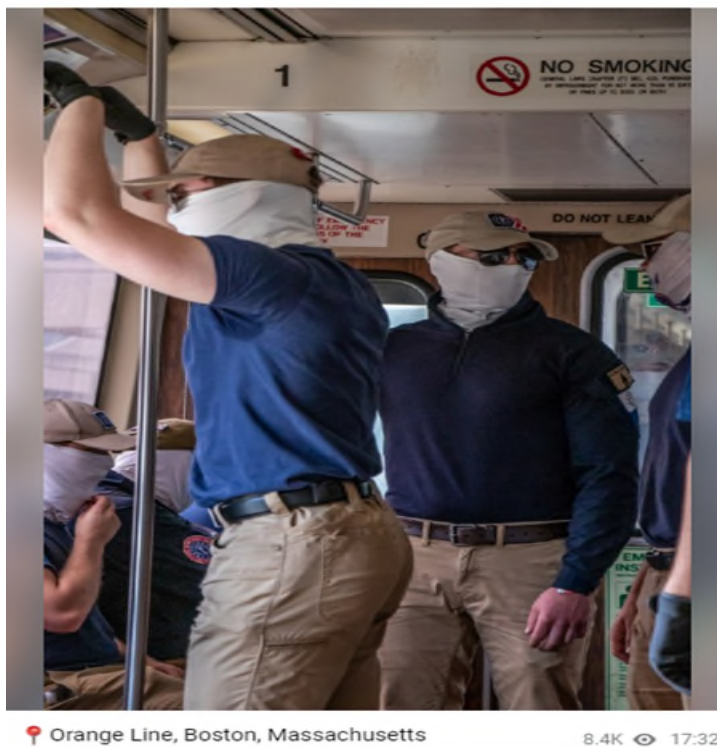
Patriot Front Members Loading Flags and Shield into Rental Truck⁵



⁵ This image appears in an article published in the Boston Herald, available here: <https://www.bostonherald.com/2022/07/02/white-supremacist-group-the-patriot-front-reportedly-marching-through-boston/>

Image Posted to Patriot Front's Telegram Page of Patriot Front Members Riding the T

Patriot Front
Forwarded from Sons Of Columbia



116. Later, state police officers tracked Defendants' rental truck to Stoneham, Massachusetts, where they found three Patriot Front members hauling dozens of metal shields, flag poles, banners, flags, a drum, and a megaphone. After officers stopped the rental truck, they discovered that Patriot Front members had attached an unregistered Arizona license plate to the truck. Upon information and belief, Patriot Front members swapped the license plate on their rental truck in an effort to avoid detection by law enforcement, which is further evidence of their planning, coordination, and intent to engage in unlawful activity.

117. After the attack, Mr. Murrell was taken by ambulance to Tufts Medical Center, where he was treated for lacerations to the head, hand, and face. Some of his physical injuries required stitches and, for days following the incident, adversely affected his ability to perform music and earn a livelihood.

Mr. Murrell Speaking at a Press Conference Two Days After the Attack⁶



118. The emotional damage Mr. Murrell has suffered, however, has lasted much longer, and continues to this day. According to the police report, in the immediate aftermath of the attack, Mr. Murrell told officers that “he was quite emotional . . . and that he needed to calm down.” Since the attack on July 2, Mr. Murrell has been plagued by severe anxiety, mental anguish, invasive thoughts, and emotional distress, including, but not limited to, persistent concern for his physical safety and loss of sleep. The incident incessantly haunts Mr. Murrell—he routinely has nightmares and flash backs about the attack, which makes him feel like he is constantly having to relive it. For example, every time Mr. Murrell goes to open his music composition book, which was on his person on July 2, 2022, he sees residue of his own blood spattered on the cover—a gruesome reminder of the attack.

⁶ This image comes from an article published in the Boston Herald, available here: <https://www.bostonherald.com/2022/07/04/black-leaders-man-injured-by-patriot-front-mob-speak-out-against-hate/>

119. Such emotional trauma has negatively affected Mr. Murrell's ability to earn a living as a composer and musician. He has been unable to complete musical composition contracts and has generally lost the will to write or perform music.

120. In the aftermath of July 2, 2022, Patriot Front has used footage of its members' assault of Mr. Murrell in multiple videos published online to promote their group and advocate for similar in-person activity in the future. Violence is a central tactic of Patriot Front as reflected in its use of this video as a propaganda tool and valorization of the violence against Mr. Murrell.

COUNT ONE
(42 U.S.C. § 1985(3))
(Against All Defendants)

121. Mr. Murrell incorporates by reference the averments contained in all preceding paragraphs.

122. Defendants Patriot Front (by and through its members), Thomas Rousseau, and John Does 1-99, agreed upon and executed a common plan to engage in obstruction, intimidation, and violence in the public streets of Boston against those who disagreed with their white supremacist agenda in violation of those individuals' constitutional rights.

123. In furtherance of that conspiracy to violate the rights of Mr. Murrell, Defendants engaged in acts of force, intimidation, and threats in Boston, Massachusetts on July 2, 2022.

124. Each Defendant committed an overt act in furtherance of the conspiracy to violate Mr. Murrell's rights when they blocked him from travelling along a public thoroughfare and then violently attacked him with their shields, fists, and feet. That conduct is detailed in the paragraphs above.

125. Co-conspirators whose identities are not currently known committed additional acts in furtherance of the conspiracy to violate Mr. Murrell's rights, including those alleged here.

126. The illegal activities described were undertaken by Defendants as overt acts pursuant to an unlawful conspiracy, the purpose of which was and is to discriminatorily deprive black people, their non-black supporters, and all individuals who disagree with Defendants' white supremacist agenda of their rights to 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 and open advocacy for the rights of nonwhite individuals.

127. As a result of the acts set out in the above paragraphs committed in furtherance of this conspiracy, Mr. Murrell suffered injuries to his person and suffered the discriminatory deprivation of one or more of his rights or privileges guaranteed to him by the United States Constitution and/or its laws because of the illegal overt acts of Defendants. These rights include, but are not limited to, Mr. Murrell's right to be free of the badges and incidents of slavery pursuant to the Thirteenth Amendment, as well as Mr. Murrell's rights to travel protected by the Fourteenth Amendment.

128. Because of Defendants' violation of his rights, Mr. Murrell has suffered numerous and various injuries, including bodily injury, lost income, and severe emotional distress in an amount to be proven at trial.

129. An award of punitive damages is appropriate because Defendants were motivated by an evil motive and intent, or were reckless or callously indifferent to Mr. Murrell's federally protected rights when they blocked him from travelling along a public thoroughfare and then violently attacked him with their shields, fists, and feet in violation of his Thirteenth and Fourteenth Amendment rights.

COUNT TWO
(Violation of Massachusetts Civil Rights Act; Mass. Gen. Laws c. 12, § 11)
(Against All Defendants)

130. Mr. Murrell incorporates by reference the averments contained in all proceeding paragraphs.

131. As detailed above, upon encountering Mr. Murrell on July 2, 2022, Defendants Patriot Front (by and through its members), its leader Rousseau, and John Does 1-99, blocked him from travelling along a public thoroughfare and then attacked him with their shields, fists, and feet.

132. Through that unlawful conduct, which included both intimidation and threats as well as actual physical violence, Defendants prevented Mr. Murrell from exercising or enjoying rights secured by the United States Constitution, the Massachusetts Declaration of Rights, and the laws of the Commonwealth of Massachusetts. Such rights include, without limitation, his right to free speech in a traditional public forum, his right to be free from racial harassment and violence, and his right to travel along the Commonwealth's public thoroughfares.

133. As a direct and proximate result of Defendants' actions, Mr. Murrell suffered physical and emotional damage in amounts to be proven at trial.

COUNT THREE
(Civil Conspiracy)
(Against Defendants Rousseau, in his individual capacity and as representative of Patriot Front, and the John Doe Defendants)

134. Mr. Murrell incorporates by reference the averments contained in all proceeding paragraphs.

135. As detailed above, starting at least as far back as December 2021, Patriot Front's leader, Rousseau, and members, John Does 1-99, conspired together and combined with one or

more persons to accomplish, through concerted action, unlawful and tortious acts in Boston on July 2, 2022, including:

- a. Subjecting persons to intimidation and violent conduct to prevent them from exercising rights secured by the United States Constitution, the Massachusetts Declaration of Rights, and the laws of the Commonwealth of Massachusetts, in violation of Mass. Gen. Laws. c. 12, § 111;
- b. Engaging in overt acts intended to place victims in fear or apprehension of bodily harm (assault);
- c. Committing unwanted, intentional touching resulting in harmful bodily contact (battery); and
- d. Engaging in extreme and outrageous conduct intended to inflict emotional distress on the victim (intentional infliction of emotional distress);

136. All Defendants, including Defendant Rousseau (in his individual and representative capacities), agreed to join the conspiracy, as demonstrated by their significant planning and preparations for, and participation in, the July 2, 2022 demonstrations and tortious conduct, and all purposefully assisted in the commission of the underlying torts and civil rights violations described herein.

137. Mr. Murrell suffered damages resulting from acts committed in furtherance of the conspiracy.

138. As co-conspirators, Defendants are jointly and severally liable to Mr. Murrell for the actions of all individuals who acted in pursuit of the common conspiratorial scheme.

COUNT FOUR
(Civil Aiding and Abetting)
(Against Defendants Rousseau, in his individual capacity and as representative of Patriot Front, and the John Doe Defendants)

139. Mr. Murrell incorporates by reference the averments contained in all proceeding paragraphs.

140. As described in detail above, Patriot Front's leader, Rousseau, and members, John Does 1-99, aided and abetted one another in committing the civil rights violations and tortious conduct described herein. Specifically, Defendants, including Rousseau, knew that the conduct of their confederates was tortious and unlawful and nonetheless gave their confederates substantial assistance and encouragement. For example, in a concerted and choreographed effort, some Defendants attacked Mr. Murrell directly, while others stood back and shouted commands such as "RIGHT SCREEN!" in an effort to coach the attackers while they surrounded and beat Mr. Murrell.

141. Mr. Murrell suffered damages resulting from Defendants' aiding and abetting of the tortious and unlawful conduct.

COUNT FIVE
(Civil Assault and Battery)
(Against Defendants Rousseau, in his individual capacity and as representative of Patriot Front, and the John Doe Defendants)

142. Mr. Murrell incorporates by reference the averments contained in all proceeding paragraphs.

143. Patriot Front's leader, Rousseau, and members, John Does 1-99, intentionally intimidated and threatened imminent physical harm on Mr. Murrell by directing derogatory and racist comments to him and by brandishing, and eventually using, their shields as weapons.

144. As a direct and proximate result of Defendants' intimidating and threatening conduct, Mr. Murrell was put in reasonable apprehension of immediate physical harm. By attacking Mr. Murrell with their shields, hands, and feet, Defendants also acted with intention to cause harmful contact with Mr. Murrell's person.

145. As a direct and proximate result of Defendants' intentionally harmful conduct, Mr. Murrell suffered harmful contact and received injuries to his head, hand and face. Some of these injuries required stitches and, for many days, hindered his ability to play music and earn a livelihood. Through this action, Mr. Murrell seeks compensatory damages for the injuries he sustained. Mr. Murrell also suffered emotionally as a result of the assault and battery and seeks emotional distress damages in an amount to be proven at trial.

COUNT SIX
(Intentional Infliction of Emotional Distress)
(Against Defendants Rousseau, in his individual capacity and as representative of Patriot Front, and the John Doe Defendants)

146. Mr. Murrell incorporates by reference the averments contained in all proceeding paragraphs.

147. The intimidating and violent conduct of Patriot Front's leader, Rousseau, and its members, John Does 1-99, toward Mr. Murrell was extreme and outrageous. Such extreme and outrageous conduct included Defendants threatening and intimidating Mr. Murrell with their words and by brandishing, and then using, their shields as weapons, as well as attacking Mr. Murrell with their fists and feet.

148. Defendants intended to cause Mr. Murrell to suffer emotional distress by engaging in the above acts that Defendants knew or should have known would cause a reasonable person emotional distress.

149. As a direct and proximate result of Defendants' conduct, Mr. Murrell has suffered severe emotional distress, as described *supra*, which has resulted in trauma that has negatively affected his ability to earn a living as a composer and musician.

150. By this action, Mr. Murrell seeks to recover monetary damages in an amount to be proven at trial.

PRAYER FOR RELIEF

WHEREFORE, plaintiff Charles M. Murrell III respectfully prays that the Court:

- A. Award Mr. Murrell compensatory and statutory damages in an amount to be determined at trial, plus pre- and post-judgment interest as allowed by law;
- B. Award Mr. Murrell punitive damages in an amount to be determined at trial;
- C. Award Mr. Murrell his costs, including his reasonable attorney's fees;
- D. Enter judgment for Mr. Murrell on each of his claims; and
- E. Award Mr. Murrell such other and further relief as the Court deems just and equitable.

CHARLES M. MURRELL III

By his attorneys,

/s/ Anthony Mirenda

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Dated: August 8, 2023

DEMAND FOR JURY TRIAL

Pursuant to Federal Rule of Civil Procedure 38, Mr. Murrell hereby demands a jury trial on all claims so triable.

CHARLES M. MURRELL III

By his attorneys,

/s/ Anthony Mirenda

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Dated: August 8, 2023