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ST. PAUL, MN

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5 **UNITED STATES DISTRICT COURT**
6 **DISTRICT OF MINNESOTA**

7 **ANN DOUCETTE,**
8 *Plaintiff, Pro Se,*

9 v.

Case No. 26-cv-1606-JMB/ECW

COMPLAINT FOR DAMAGES

DEMAND FOR JURY TRIAL

- 10 1) NEKIMA LEVY ARMSTRONG,
11 aka "Nekima Valdez Levy-
12 Pounds,"
- 13 2) WILLIAM SCOTT KELLY,
14 aka "DaWokeFarmer,"
- 15 3) CHAUNTYLL LOUISA ALLEN
- 16 4) DON RENALDO LEMON,
- 17 5) JAMAEL LYDELL LUNDY,
- 18 6) TRAHERN JEEN CREWS,
- 19 7) GEORGIA ELLYSE FORT,
- 20 8) JEROME DEANGELO RICHARDSON,
21 and DOES 1 through 25 inclusive,
22 *Defendants.*

23 **INTRODUCTION**

- 24 1. The Cities Church ("the Church") is a Christian house of worship in St. Paul, Minnesota.
- 25 2. On the morning of Sunday, January 18, 2026, Plaintiff Ann Doucette attended a worship
26 service led by the Church's pastor.
- 27 3. During the service, a coordinated group of individuals, including all named Defendants,
28 unlawfully entered the Church as part of a pre-planned and organized disruption
intended to interfere with worship.
- 4. As a result of Defendants' actions, the worship service was disrupted, congregants

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1 experienced fear and distress, and Plaintiff's ability to freely exercise her religion in a
2 private place of worship was unlawfully interfered with.

- 3 5. This action seeks to hold Defendants accountable for their unlawful coordination,
4 trespass, interference with religious exercise, and intentional infliction of emotional
5 distress, and to obtain damages, injunctive relief, and other remedies as allowed under
6 Minnesota law and federal civil rights statutes.

7 **PARTIES**

8 6. Plaintiff Ann Doucette is an individual who, at all times relevant, was attending a
9 worship service at Cities Church ("the Church") in St. Paul, Minnesota.

10 7. Defendants are the following individuals and additional unknown persons who,
11 according to federal indictments, social media evidence, and whistleblower statements,
12 coordinated, planned, and participated in an unlawful disruption of the Church on or
13 about January 18, 2026, causing harm to Plaintiff:

14 NEKIMA LEVY ARMSTRONG ("ARMSTRONG"),

15 CHAUNTYLL LOUISA ALLEN ("ALLEN"),

16 WILLIAM SCOTT KELLY ("KELLY"),

17 DON RENALDO LEMON ("LEMON"),

18 JAMAEL LYDELL LUNDY ("LUNDY"),

19 TRAHERN JEEN CREWS ("CREWS"),

20 GEORGIA ELLYSE FORT ("FORT"),

21 JEROME DEANGELO RICHARDSON ("RICHARDSON"),

22 and DOES 1 through 25 inclusive.

23 **JURISDICTION AND VENUE**

24 8. This Court has subject matter jurisdiction under 28 U.S.C. § 1331 because Plaintiff's
25 claims arise under the United States Constitution and federal law, including
26 interference with the free exercise of religion and civil rights.

27 9. Venue is proper in this district because the events giving rise to Plaintiff's claims
28 occurred in St. Paul, Minnesota.

FACTUAL ALLEGATIONS

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2 10. On January 18, 2026, Plaintiff was attending a worship service at Cities Church in
3 St. Paul, Minnesota.

4 11. Defendants, acting together, beginning on a date prior to January 18, 2026, and
5 continuing through that morning, planned and executed a coordinated disruption of the
6 worship service and entered the Church without consent and/or exceeded the scope of
7 any implied consent by entering for the pre-planned purpose of disrupting worship,
8 intimidating congregants, and obstructing the service.

9 12. Defendants' coordinated conduct included:

- 10 a. Pre-arranged meetings and communications to plan the operation dubbed
11 "Operation Pullup", including a pre-operation briefing in a public parking lot;
- 12 b. Organizing and promoting the operation on social media, including livestreams and
13 promotional flyers; (Exhibit A)
- 14 c. Positioning themselves among congregants to block movement and create
15 disruption;
- 16 d. Loud chanting, shouting, and aggressive gestures inside the sanctuary;
- 17 e. Direct interference with Plaintiff's ability to pray and participate in worship;
- 18 f. Causing fear, distress, and emotional trauma to Plaintiff and other congregants;
- 19 g. Obstructing safe movement within the Church, including areas used by children.

20 Defendant RICHARDSON admitted via social media to assisting Defendant LEMON
21 with logistics and local contacts in support of the operation. He described his role as
22 ground coordination and facilitation, providing direct evidence of the planning and
23 coordination among Defendants. (Exhibit B)

24 13. Defendants LEMON, FORT, ARMSTRONG, ALLEN, KELLY, LUNDY and CREWS
25 personally participated in disrupting the service, chanting slogans such as "ICE Out!"
26 and "Hands Up, Don't Shoot!," obstructing aisles, and confronting the pastor and
27 congregants in a menacing manner.

28 14. Defendant LEMON livestreamed portions of the operation, noting congregants' fear

1 and distress, and appeared to take satisfaction in the disruption.

2 15. As a result of Defendants' coordinated actions, Plaintiff suffered severe emotional
3 distress, fear, anxiety, and trauma, as well as interference with her religious exercise
4 and invasion of a private and sacred space.

5 **CAUSES OF ACTION**

6 **Count 1 – Civil Conspiracy (Minnesota Common Law)**

7 16. Plaintiff realleges all preceding paragraphs.

8 17. Defendants agreed to engage in unlawful conduct, namely the disruption of the
9 Church, with an overarching plan to coordinate logistics, timing, and conduct in
10 furtherance of the disruption.

11 18. Defendant RICHARDSON's admission of logistical assistance to Defendant LEMON
12 demonstrates the existence of an agreement to coordinate and plan the unlawful
13 conduct.

14 19. Defendants committed acts in furtherance of the agreement, including:

- 15 • Pre-operation briefings and social media promotion;
16 • Traveling to the Church in coordinated groups;
17 • Obstructing and intimidating congregants inside the sanctuary.

18 20. Plaintiff suffered harm as a direct and proximate result of this conspiracy.

19 **Count 2 – Aiding and Abetting / Facilitating Tortious Conduct**

20 21. Plaintiff realleges all preceding paragraphs.

21 22. Defendants substantially assisted, encouraged, or facilitated the unlawful disruption,
22 including those who did not physically enter the Church.

23 23. Defendants LEMON and FORT materially assisted by receiving logistical support and
24 promoting the operation via livestream, enabling other Defendants to execute the plan.

25 **Count 3 – Intentional Infliction of Emotional Distress (IIED)**

26 24. Plaintiff realleges all preceding paragraphs.

27 25. Defendants' conduct was extreme and outrageous, intended or recklessly disregarding
28 the likelihood of causing severe emotional distress.

1 26. Plaintiff suffered severe emotional distress, fear, anxiety, and trauma as a result of
2 Defendants' actions, including the terror they caused children and vulnerable
3 congregants.

4 **Count 4 – Interference with Religious Exercise / Disruption of Worship**

5 27. Plaintiff realleges all preceding paragraphs.

6 28. Defendants intentionally interfered with Plaintiff's ability to exercise her religion,
7 pray, and participate in worship services, intentionally preventing the service from
8 proceeding and threatening congregants.

9 29. Defendants' actions violated Plaintiff's rights to free exercise of religion and
10 peaceable assembly.

11 **Count 5 – Trespass / Aiding and Abetting Trespass**

12 30. Plaintiff realleges all preceding paragraphs.

13 31. Defendants, and persons whose trespass they facilitated, entered the Church without
14 consent and/or exceeded the scope of any implied consent by entering for the pre-
15 planned purpose of disrupting worship, obstructing access and movement within the
16 Church, and interfering with the Church's possessory and property rights.

17 **PRAYER FOR RELIEF**

18 WHEREFORE, Plaintiff Ann Doucette respectfully requests that this Court enter
19 judgment against Defendants NEKIMA LEVY ARMSTRONG, CHAUNTYLL LOUISA
20 ALLEN, WILLIAM SCOTT KELLY, DON RENALDO LEMON, JAMAEL LYDELL
21 LUNDY, TRAHERN JEEN CREWS, GEORGIA ELLYSE FORT, JEROME DEANGELO
22 RICHARDSON, and DOES 1 through 25, inclusive, as follows:

- 23 1. General damages according to proof, including but not limited to emotional
24 distress, fear, anxiety, trauma, and interference with Plaintiff's ability to freely
25 exercise her religion;
- 26 2. Punitive and exemplary damages in an amount sufficient to punish Defendants and
27 deter future similar misconduct, pursuant to Minnesota Statutes § 549.20, and
28 applicable federal law, because Defendants' actions were willful, malicious,

1 oppressive, and done with reckless disregard of Plaintiff's civil rights, including the
2 right to freely exercise religion and the right to be free from intentional infliction of
3 emotional distress;

4 3. Injunctive relief restraining Defendants and any persons acting in concert with them
5 from entering Cities Church or otherwise interfering with worship services,
6 congregants, or religious activities;

7 4. Attorneys' fees, costs of suit, and pre- and post-judgment interest to the extent
8 permitted by law, including but not limited to those available under federal civil rights
9 statutes (e.g., 42 U.S.C. § 1988) and Minnesota law;

10 5. Any other relief the Court deems just and proper to redress the harms suffered by
11 Plaintiff and to prevent future violations of civil rights and religious freedoms.

12 Plaintiff demands a trial by jury on all issues so triable.

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Dated: February 12, 2026

Respectfully submitted,



Ann Doucette
Plaintiff, Pro Se