

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
PENNSYLVANIA

ROUTES 202 AND 309 AND NOVELTIES
GIFTS, INC.
608 UPPER STATE ROAD
NORTH WALES, PA 19454

Plaintiff

CIVIL ACTION

v.

THE KINGS MEN
88 E. Pennsylvania Avenue
Oreland, PA 19075

No:

AND

MARK HOUCK

Quakertown, PA 18951

AND

DAMIAN WARGO

Philadelphia, PA 19119

AND

DAVID DINUZZO, SR.
C/O THE KINGS MEN
88 E. PENNSYLVANIA AVENUE
ORELAND, PA 19075

AND

DESARAE MCDONNELL

North Wales, PA 19454

AND

JOHN A. MCGANN, 3RD

Easton, PA 18042

AND

4. Defendant Damian Wargo (“Wargo”) is a citizen and resident of the Commonwealth of Pennsylvania, County of Philadelphia, residing at, Philadelphia, PA. Upon information and belief, Wargo is the Director of Operations of TKM.

5. Defendant David DiNuzzo, Sr. (“DiNuzzo”) is a citizen and resident of the Commonwealth of Pennsylvania, with a business address at 88 E. Pennsylvania Avenue, Oreland, PA. Upon information and belief, DiNuzzo is the Director of Programming president of TKM.

6. Defendant Desarae McDonnell (“McDonnell”) is a citizen and resident of the Commonwealth of Pennsylvania, County of Montgomery, residing at, North Wales, PA 19454. Upon information and belief, McDonnell was a participant in the protest of August 3, 2011 described *infra*.

7. Defendant John R. McGann, 3rd (“McGann”) is a citizen and resident of the Commonwealth of Pennsylvania, County of Northampton, residing at, Easton, PA 18042. Upon information and belief, McGann was a participant in the protest of August 3, 2011 described *infra*.

8. Defendant Robert Lechter (“Lechter”) is a citizen and resident of the Commonwealth of Pennsylvania, County of Montgomery, residing at, North Wales, PA. Upon information and belief, Lechter was a participant in the protest of August 3, 2011 described *infra*.

9. Defendant Charles Harvey (“Harvey”) is a citizen and resident of the Commonwealth of Pennsylvania, County of Philadelphia, residing at, Philadelphia, PA 19128. Upon information and belief, Harvey was a participant in the protest of August 3, 2011 described *infra*.

10. Defendant Phillip Greco (“Greco”) is a citizen and resident of the Commonwealth of Pennsylvania, County of Montgomery, residing at, East Norriton, PA. Upon information and belief, Greco was a participant in the protest of August 3, 2011 described infra.

11. John Does 1-100 are all unidentified persons participating in the September 14, 2011 protest.

VENUE

12. Venue is appropriate in this Court the under 28 U.S.C. Section 139(a)(2) as the incidents complained occurred in the County of Montgomery at the business address of the Plaintiff.

JURISDICTION

13. This Honorable Court has jurisdiction over the within under 28 U.S.C. Section 1331 (federal question) and 28 U.S.C. Section 1367 (pendent state law claims).

RELIEF REQUESTED

14. Plaintiffs are seeking an injunction prohibiting the Defendants from protesting at the Plaintiff’s business address, compensatory and punitive damages for the actions of the defendants in concert and reasonable attorney’s fees as provided for by statute.

15. Plaintiffs seek redress for the Defendant’s infringement of the Plaintiff’s right to free speech and commercial expression, Defendant’s trespass and infringement on the property of the Plaintiff, disrupting the free use and enjoyment of real property, Defendant’s illegal coercion and infringement on the rights of the Plaintiff to conduct its business in violation of the Sherman Act, common law trespass, public nuisance and private nuisance.

16. Plaintiff believes and therefore avers that the actions of the Defendants constitute irreparable damage and as a result Plaintiff is entitled to equitable relief.

BACKGROUND

17. TKM is a Roman Catholic fraternal organization.
18. TKM is a registered Pennsylvania non-profit corporation.
19. TKM advertises that it an organization whose goal is to develop men to be “leaders, protectors and providers” through education formation and action.
20. TKM through its Internet site in addition to the formation of men’s groups throughout the country also organizes and conducts “noble battles”. (Exhibit 1)
21. TKM asserts that there are three separate battlefields to which they intend to organize their efforts. These battlefields are abortion, “pornography” and the defense of traditional marriage.
22. TKM asserts on its website that it has made the strategic decision to organize its efforts to eliminate “pornography”.
23. TKM has given this “noble battle” the moniker of the “No More Porn Tour”. (Exhibit 2)
24. TKM believes the sexually explicit material is a contributing factor to the moral decay and decline of the family.
25. TKM believes that sexually explicit material is an “intimacy disorder”.
26. TKM is of the viewpoint that sexually explicit material is the root cause of adultery, fornication, rape, incest, the contraceptive mentality, divorce and abortion. (Exhibit 3)
27. TKM believes that “pornography” should be eliminated.
28. As a result of that belief, TKM organizes and protests at adult based businesses.

THE ACTIONS OF TKM AND HOUCK, WARGO AND DINUZZO

29. TKM is directed and controlled by Houck, Wargo and DiNuzzo. (Exhibit 4)

30. TKM is an entity involved in interstate commerce.

31. TKM and Houck, Wargo and DiNuzzo have solicited others to act in concert with them. (Exhibit 1-4)

32. TKM has drafted and circulated an "Activism Checklist" for the carrying out of protests at adult based businesses.

33. TKM and Houck, Wargo and DiNuzzo have orchestrated and solicited others to conduct protests at adult based businesses with the goal of closing these businesses.

34. TKM and Houck, Wargo and DiNuzzo advertise and admit that they have protested or have joined with others to protest at locations across the country. (Exhibit 5)

35. TKM and Houck, Wargo and DiNuzzo advertise and admit that they are currently protesting or have joined with others to protest at the locations on Exhibit 5.

36. TKM and Houck, Wargo and DiNuzzo advertise that they have organized 200 protests across the United States and have cost the adult based industry hundreds to thousands of dollars per protest. (Exhibit 2)

37. TKM and Houck, Wargo and DiNuzzo claim that their protests have caused the closure of five adult businesses. (Exhibit 3)

38. TKM and Houck, Wargo and DiNuzzo have conducted celebrations of the closings of adult businesses. The most recent celebration was on July 22, 2011 to celebrate the closing of the Coyote Show Club in Quakertown, PA.

39. Adult based entertainment has been determined by the United States Supreme Court to be expression protected by the First Amendment to the United States Constitution.

40. Upon information, knowledge and belief the defendants above named have acted in concert and conspired to impose undue limitations on competitive conditions and have imposed restrictions on competitive opportunity.

**THE ACTIONS OF TKM AND HOUCK, WARGO, DINUZZO,
MCDONNELL, MCGANN, LECHTER, HARVEY AND GRECO-
ADULT WORLD PROTEST OF AUGUST 3, 2011**

41. On August 3, 2011, Plaintiff operated and continues to operate an adult based business at the above referenced address.

THE PROTEST

42. On August 3, 2011, at or about 4:00 p.m., Defendants and persons unidentified traveled to and came upon the real property of the Plaintiff.

43. Defendants came to the Plaintiff's property in front of and on the side of the Plaintiff's building with the intent to disrupt Plaintiff's business.

44. In order for the Court to understand the location and the actions of the Defendants this Honorable Court should understand the geography and layout of the property.

45. Adult World operates from a two story building (Exhibit 6)

46. There is a macadam-coated parking lot between the building and the curb line.

47. There is no sidewalk along the property line abutting Upper State Road.

48. One of the properties neighboring Plaintiff have sidewalks installed.

49. Review of the existing approved land use plans indicates since the expansion of Upper State Road in 2006 the "right of way" is located within Upper State Road and not on Plaintiff's property.

50. Plaintiff has driveways for ingress and egress to the property.

51. On Plaintiff's property between the driveways is a decorative mulched floral area. Picture attached as Exhibit

52. Defendants arrived at the business address of the Plaintiff with the express purpose of disrupting Plaintiff's employees, customers and passersby.

WHAT HAPPENED AT THE PROTEST

53. During the protest, Defendants were instructed by Plaintiff's manager that they were not welcome on the property and that they the course of the protest Defendants walked down the right hand side of the property away from the curb line in an attempt to carry out their activities.

54. Defendants called out to customers and employees in an attempt to interfere with Plaintiff's business and proselytize their viewpoints.

55. Defendants were trespassing.

56. Defendants refused to leave.

57. Plaintiff's manager called Montgomery Township Police and complained that the Defendants were defiantly trespassing on Plaintiff's property.

58. Montgomery Township dispatched a policeman who upon arrival at Plaintiff's business address instructed Defendants that they were to leave the side area of Plaintiff's building and confine themselves to the decorative mulched floral area located on the frontage of the property between the driveways.

59. Plaintiff was advised by Montgomery Township Police that while Defendants had to leave the sides of the building that they would be permitted to remain on the decorative mulched floral area, as there was an "right of way."

60. After the instruction by the police, Defendants then retreated to the decorative mulched floral area.

61. The decorative mulched floral area is a curb width away from Upper State Road, Route 202, Montgomeryville.

62. Upper State Road is a highly trafficked state highway.

63. As a result of the protests motor vehicles were slowing down and stopping.

64. Defendants attempted to hand out literature to these vehicles by stepping out into the traffic lanes of Upper State Road.

65. During the August 3, 2011 protest there was a disruption of traffic by vehicles either slowing down or stopping.

66. Upon information, knowledge and belief, several vehicles made abrupt stops to avoid collisions with other vehicles that were stopped to receive TKM literature from the decorative mulched floral area.

FALSE ALLEGATIONS

67. During the August 3, 2011 protest, a leader of TKM spoke with the news media.

68. During the course of that interview, this TKM leader made the untrue allegation that illegal acts were taking place on the premises.

69. This statement was made with reckless disregard for the truth and for the purpose of further tortious interference with the Plaintiff's business.

FURTHER TRESPASS AND DISREGARD FOR PLAINTIFF

70. During the August 3, 2011 protest, TKM through Houck reported that TKM and the Defendants buried "Miraculous Medals" in the Plaintiff's ground and sprinkled Holy Water on Plaintiff's ground. (Exhibit 7)

71. These actions were carried out without the permission of the Plaintiff.

THE ACTIONS OF TKM AND HOUCK, DINUZZO, AND OTHER UNIDENTIFIED PERSONS-ADULT WORLD PROTEST OF SEPTEMBER 14, 2011

72. After the August 3, 2011 protest, TKM advertised and orchestrated to their membership that a future protest at Plaintiff's business location would take place on September 7, 2011.

73. On September 7, 2011 no one protested

74. However, on September 14, 2011, at or about 4:00 p.m., Defendants and persons unidentified traveled to and came upon the real property of the Plaintiff.

75. Defendants arrived at the business address of the Plaintiff with the express purpose of disrupting Plaintiff's employees, customers and passersby.

76. Defendants through the use of their placards were obstructing the safe ingress and egress of Plaintiff's employees, customers and business invitees.

77. Plaintiff summoned Montgomery Township Police and requested assistance in abating this nuisance and danger.

78. Montgomery Township Police instructed TKM, Houck and DiNuzzo and other unidentified persons to cease obstructing the safe ingress and egress to the property.

79. After Montgomery Township Police left, TKM, Houck and DiNuzzo and other unidentified persons through use of their placards and were "leaning" into Upper State Road to such an extent that the free flow of traffic was obstructed and vehicles had to swerve.

80. Plaintiff summoned Montgomery Township Police and requested assistance in abating this nuisance and danger.

81. Montgomery Township Police instructed TKM, Houck and DiNuzzo and other unidentified persons to cease this activity.

82. Defendants present a clear and imminent danger to motorists and other travelers.

83. Defendants are creating a danger which must be abated.

COUNT I
PLAINTIFF V. ALL DEFENDANTS
TRESSPASS

84. Paragraphs 1-83 are incorporated herein as if set forth at length.

85. Defendants have acted in concert and conspired.

86. Defendants have conspired to on a continual basis to trespass on the property of the Plaintiff.

87. Defendants have been noticed that they are trespassing and that they are without privilege to do so.

88. Despite actual notice Defendants have continued to trespass and have informed their followers that they intend to trespass again on September 7, 2011. (Exhibit 8)

89. Upon information, knowledge and belief, an organizer of the TKM had been arrested and convicted of defiant trespass.

90. Upon information, knowledge and belief, TKM and Houck, Wargo and DiNuzzo are authorizing and/or directing others to trespass upon the property of the Plaintiff.

91. Defendants intended to conduct a protest and trespass on Plaintiff's property on September 7, 2011.

92. Instead of September 7, 2011 as advertised Defendants arrived on September 14, 2011 and continued to interfere with the free and quiet enjoyment of the property.

93. The threat of harm is immediate and irreparable.

94. As a direct and proximate result of the actions of the Defendants, Plaintiff has sustained damages.

WHEREFORE, Plaintiffs demand judgment against the Defendants and respectfully request this Honorable Court to:

- a. Enter a Permanent Injunction prohibiting Defendants from soliciting, organizing, conducting and participating in protest activity at the Plaintiff's business location;
- b. Declare that the Defendants' conduct is illegal;
- c. Award Plaintiff compensatory damages;
- d. Award Plaintiff punitive damages;
- e. Award triple damages as allowed by statute;
- f. Award reasonable counsel fees for the necessity of bringing this action;

and

- g. All other relief as this Honorable Court deems just and proper.

COUNT II
PLAINTIFF V. ALL DEFENDANTS
PUBLIC NUSIANCE

95. Paragraphs 1-94 are incorporated herein as if set forth at length.

96. As a result of the instructions of the Montgomery Township Police, Defendants protests have been limited to the decorative mulched floral area at the curb line of Upper State Road.

97. Upper State Road is highly trafficked.

98. The general public has a right to free and unfettered travel on Upper State Road.

99. The general public has a right to safety along this road.

100. There is a substantial risk of a protestor either purposely or accidentally entering the traffic lanes causing a potential hazard to both the individual and motorist.

101. The interference with traffic causes a risk to other motorists.

WHEREFORE, Plaintiffs demand judgment against the Defendants and respectfully request this Honorable Court to:

- a. Enter a Permanent Injunction prohibiting Defendants from soliciting, organizing, conducting and participating in protest activity on the decorative mulched floral area at the Plaintiff's business location;
- b. Declare that the Defendants' conduct is a public nuisance and illegal;
- c. All other relief as this Honorable Court deems just and proper.

COUNT III
PLAINTIFF V. ALL DEFENDANTS
PRIVATE NUISANCE

102. Paragraphs 1-101 are incorporated herein as if set forth at length.

103. As a result of the instructions of the Montgomery Township Police, Defendants protests have been limited to the decorative mulched floral area at the curb line of Upper State Road.

104. Upper State Road is highly trafficked.

105. Plaintiff has accepted the risk, while utilizing all reasonable care that a business invitee may be injured while on Plaintiff's property.

106. Plaintiff has accepted the risk, while utilizing all reasonable care that a motorist while entering and exiting the business invitee may be involved in a potential traffic accident.

107. In the past, Defendants have slowed and obstructed the ingress and egress of Plaintiff's business invitees.
108. Defendants have obstructed the view of business invitees, employees and other authorized persons from a clear and unobstructed view of oncoming traffic when exiting Plaintiff's property.
109. Plaintiffs have not accepted the risk, while exercising all reasonable care, that one or more of the Defendants herein named or in the future will injure themselves on Plaintiff's property.
110. Plaintiffs have not accepted the risk, while exercising all reasonable care, that one or more of the Defendants herein named or in the future will injure become injured while intentionally entering into Upper State Road to proselytize or had out leaflets.
111. Plaintiffs have not accepted the risk, while exercising all reasonable care, that one or more of the Defendants herein named or in the future will be injured by falling off of the decorative mulched floral area become injured while intentionally or by accident entering into Upper State Road.
112. Plaintiff has the right to be free of the above described risks.
113. Plaintiff has a duty to exercise all reasonable care to their business invitees and guests.
114. Defendants conduct constitutes a private nuisance.

WHEREFORE, Plaintiffs demand judgment against the Defendants and respectfully request this Honorable Court to:

- a. Enter a Permanent Injunction prohibiting Defendants from soliciting, organizing, conducting and participating in protest activity on the decorative mulched floral area at the Plaintiff's business location;
- b. Declare that the Defendants' conduct is a private nuisance and illegal;
- c. All other relief as this Honorable Court deems just and proper.

COUNT IV
PLAINTIFF V. ALL DEFENDANTS
VIOLATION/SUPPRESSION OF FREE SPEECH

115. Paragraphs 1-114 are incorporated herein as if set forth at length.
116. Plaintiff is entitled to the right of free speech and expression under the United States Constitution First Amendment and Pennsylvania State Constitution, Article 1 and Section 7.
117. Defendants have acted in concert and conspired.
118. Defendants have conspired to deprive and have deprived Plaintiff of their right to free commercial expression.
119. As a direct and proximate result of the actions of the Defendants Plaintiff has sustained damages.

WHEREFORE, Plaintiffs demand judgment against the Defendants and respectfully request this Honorable Court to:

- a. Enter a Permanent Injunction prohibiting Defendants from soliciting, organizing, conducting and participating in protest activity at the Plaintiff's business location;
- b. Declare that the Defendants' conduct is illegal;
- c. Award Plaintiff compensatory damages;

- d. Award Plaintiff punitive damages;
- e. Award triple damages as allowed by statute;
- f. Award reasonable counsel fees for the necessity of bringing this action;

and

- g. All other relief as this Honorable Court deems just and proper.

COUNT V
PLAINTIFF V. ALL DEFENDANTS
VIOLATION OF SHERMAN ACT

- 120. Paragraphs 1-119 are incorporated herein as if set forth at length.
- 121. Defendants have acted in concert and conspired.
- 122. Defendants have conspired to impose undue limitations on competitive conditions and have restricted competitive opportunity.
- 123. Defendants are conspiring to limit and eliminate the business of sexually explicit material as a whole.
- 124. Defendants have caused or were a cause in the closure of other unaffiliated adult based businesses in the Commonwealth of Pennsylvania and other states.
- 125. Defendants have violated Section 1 of the Sherman Act.
- 126. As a direct and proximate result of the actions of the Defendants Plaintiff has sustained damages.

WHEREFORE, Plaintiffs demand judgment against the Defendants and respectfully request this Honorable Court to:

- a. Enter a Permanent Injunction prohibiting Defendants from soliciting, organizing, conducting and participating in protest activity at the Plaintiff's business location;
- b. Declare that the Defendants' conduct is illegal;

- c. Award Plaintiff compensatory damages in excess of \$50,000;
- d. Award Plaintiff punitive damages in excess of \$50,000;
- e. Award triple damages as allowed by statute;
- f. Award reasonable counsel fees for the necessity of bringing this action; and
- g. All other relief as this Honorable Court deems just and proper.

COUNT VI
PLAINTIFF V. ALL DEFENDANTS
VIOLATION OF RACKETEER INFLUENCED AND CORRUPT ORGANIZATION
ACT/HOBBS ACT

- 127. Paragraphs 1-126 are incorporated herein as if set forth at length.
- 128. Defendants have acted as an ongoing organization.
- 129. Defendants have acted to extort both tangible and intangible property interests of the Plaintiff
- 130. Defendants have and will continue to pursue a organized campaign to conduct this illegal activity.
- 131. Defendants are conspiring to limit and eliminate the business of sexually explicit material as a whole.
- 132. Defendants through their actions have adversely affected interstate commerce.
- 133. As a direct and proximate result of the actions of the Defendants Plaintiff has sustained damages.

WHEREFORE, Plaintiffs demand judgment against the Defendants and respectfully request this Honorable Court to:

- a. Enter a Permanent Injunction prohibiting Defendants from soliciting, organizing, conducting and participating in protest activity at the Plaintiff's business location;

- b. Declare that the Defendants' conduct is illegal;
- c. Award Plaintiff compensatory damages;
- d. Award Plaintiff punitive damages;
- e. Award triple damages as allowed by statute;
- f. Award reasonable counsel fees for the necessity of bringing this action;
- g. Award reasonable counsel fees and costs and
- h. All other relief as this Honorable Court deems just and proper.

COUNT VII
PLAINTIFF V. ALL DEFENDANTS
REQUEST FOR EQUITABLE RELIEF

134. Paragraphs 1-133 are incorporated herein as if set forth at length.

135. The Actions of the Defendants have caused and will left unabated cause immediate and irreparable harm.

136. Defendants have acted in concert and conspired.

137. Plaintiff requests a temporary restraining order to preserve the status quo and after hearing a permanent injunction to abate the harm cause and threatened to be caused by the actions of the Defendants.

WHEREFORE, Plaintiffs demand judgment against the Defendants and respectfully request this Honorable Court to:

- a. Enter a Temporary restraining order to preserve the status quo pending full hearing;
- b. Enter a Permanent Injunction prohibiting Defendants from soliciting, organizing, conducting and participating in protest activity at the Plaintiff's business location;

c. All other relief as this Honorable Court deems just and proper.

COUNT VIII
PLAINTIFF V. ALL DEFENDANTS
PUNITIVE DAMAGES

138. Paragraphs 1-136 are incorporated herein as if set forth at length.

139. The Actions of the Defendants are willful, deliberate and with the intent to harm the Plaintiff.

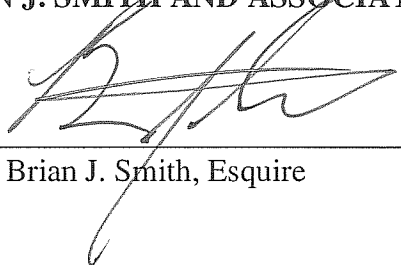
140. Plaintiff is lawfully conducting business under all federal, state and local law.

WHEREFORE, Plaintiffs demand judgment against the Defendants and respectfully request this Honorable Court to:


- a. Award Plaintiff punitive damages;
- d. Award triple damages as allowed by statute;
- e. Award reasonable counsel fees for the necessity of bringing this action;
- f. Award reasonable counsel fees and costs and
- g. All other relief as this Honorable Court deems just and proper.

BRIAN J. SMITH AND ASSOCIATES

Date: 9/15/11

By: 

Brian J. Smith, Esquire

By: 

Joseph A. Diorio, Esquire

BRIAN J. SMITH AND ASSOCIATES
140 E. Butler Avenue
Ambler, PA 19003
(215) 659-8700
Attorneys for Plaintiff

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SHARON GRECO
LAW OFFICE OF BRIAN J. GRECO, P.A.

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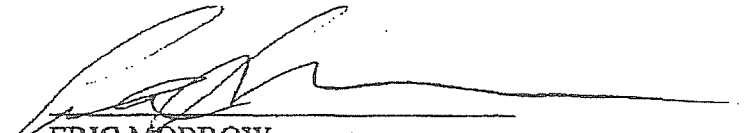
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VERIFICATION

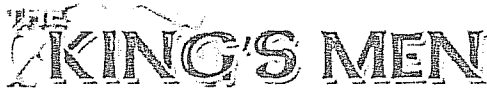
I, ERIC MORROW, am the President of Plaintiff in the aforementioned action and do hereby verify that the averments in the Verified Complaint in Equity are true and correct to the best of my knowledge, information and belief. I understand that this statement is subject to the penalties of 18PA. C.S. 4904 relating to unsworn falsification to authorities.


ERIC MORROW

Date: August 31, 2011

Case# 2011-24961-0 Received at Montgomery County Prothonotary on 09/01/2011 12:20 PM, Fee = \$251.00

EXHIBIT 1



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Engage in Noble Battles

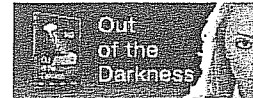
The King's Men summon all men to engage in a noble battle! We do this because authentic masculinity is obtained through education, formation, and healing [for some men] with an eventual call to action. Fundamental to the development of authentic manhood is the knowledge that all men are called to lead, protect and provide for women, children and the common good.

The King's Men call men to find meaning in their vocation as husbands, fathers, sons and brothers by creating opportunities for them to be leaders, protectors and providers in their homes and community. These experiences are what we call noble battles.

The King's Men have identified three key battlefields for men today: abortion, pornography and the defense of traditional marriage. TKM has made a strategic decision to position our efforts against the multi-billion dollar porn industry. We focus our energies on fighting pornography because we believe it is a root cause of abortion and the leading contributor to the destruction of marriage.

Please visit our [Fighting Pornography](#) page.

Out of the Darkness

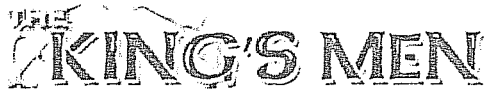


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EXHIBIT 2



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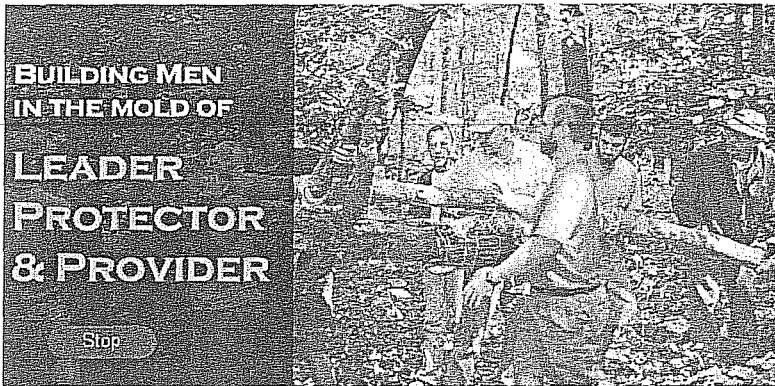
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No More Porn Tour

Overview



The multi-billion dollar pornography industry is out of control, unregulated, and destroying the common good. Pornography devastates families and the lives of millions of men and women who are caught in the snares of sexual addiction. By in large, the pornographers have been operating without any resistance.....until now! TKM strongly believes that every man is a protector, especially of women and children, both of whom are victimized by pornography. With over 200 stops, the No More Porn Tour is costing adult businesses "100's to 1000's of dollars" per protest. In fact, through the power of prayer and action of TKM, five S.O.B's (sexually oriented businesses) that TKM has protested have shut down business! The No More Porn Tour is an opportunity to share the truth of God's plan for sex and marriage. At the protest, information is available on healing and freedom for

those who are trapped in the slavery of addiction. Large signs and excellent literature about the dangers of pornography are distributed. The protest is charitable and emphasizes the message of true love. For a further explanation, [click here](#).

[Check Out Our Protest](#)

Getting Started

[Activism Checklist for Protesting Sexually Oriented Businesses](#)

For comprehensive phone, email, and in-person support on starting a protest in the mold of the No More Porn Tour, contact Dave DiNuzzo, Director of Programming, at dave@thekingsmen.org or 412-475-8783

Victories

- [Coyotes Shut Down](#)
- ["Just Sports" Will be Sold](#)
- [Signatures Strip Club Closes](#)
- [Strip Club Goes Family](#)

Events

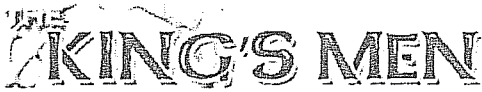
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Out of the Darkness



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IN THE MOLD OF
LEADER
PROTECTOR
& PROVIDER**

Stop

Go "Into the Wild"

Book a TKM Speaker

Join a Men's Group

Engage in Noble Battles

Fighting Pornography

Arguably, pornography is the greatest evil and threat to our society today. The King's Men believe that pornography can be a root cause of the following: fornication, adultery, sexual abuse, rape, incest, the contraceptive mentality, divorce and abortion (core value #3 of TKM). Men need to fight this battle for two primary reasons: (1) pornography is the #1 addiction in the world today with 1 out of 2 men and 1 out of 6 women suffering; and (2) all men are called to protect women and children—the primary victims of pornography.

Victory is obtainable! The King's Men have been involved with the closing of 5 sexually oriented businesses (3 in Pennsylvania, 1 in Baltimore and 1 in Hollywood). The power that men wield when they are united in a common mission is unspeakable. The closing of sexually oriented businesses and the necessary awareness raised to the harms of pornography in a community has been achieved by very small bands of brothers. Can you imagine what good we could accomplish if more men banded together in the mission to eradicate porn?

To date, The King's Men have organized over a hundred protests and demonstrations against the multi-billion dollar porn industry across the United States. These protests are a part of what we call the No More Porn Tour.

For more info on The King's Men No More Porn Tour please [click here](#).

Other Resources on Fighting Pornography

www.purehope.net
www.moralityinmedia.org

Section Navigation

- [How to Fight Porn](#)
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Resources

- [Masculine Spirituality](#)
- [TKM Men's Handbook](#)
- [Starting a Men's Group](#)
- [Fighting Pornography](#)
- [Dangers of Porn](#)
- [Freedom from Pornography](#)

Out of the Darkness

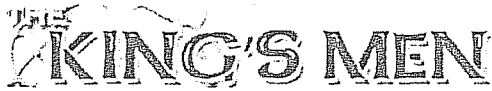


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EXHIBIT 4



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**BUILDING MEN
IN THE MOLD OF
LEADER
PROTECTOR
& PROVIDER**

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Book a TKM Speaker

Join a Men's Group

Engage in Noble Battles

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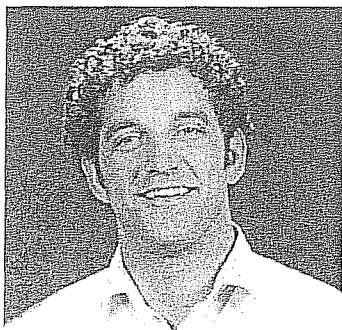
Sign-up for Special Updates and Discounts on TKM Events and Products:

Email:



Mark Houck, President
267-980-5507
mark@thekingsmen.org

Mark Houck, Co-Founder & President of The King's Men, is a 1997 graduate of The Catholic University of America in Washington, D.C. After pursuing his dreams to become a professional football player following his playing days in college, Mark worked in Human Resource Management as a recruiter, salesman & production manager. Feeling called to make a difference in young people's lives, he transitioned into a career as a counselor at a juvenile correction facility from 1998-2002. Upon receipt of his Master's Degree in Education in 2003 from Holy Family University in Philadelphia, Mark began his career lecturing teens on their sexuality through the ministry of Generation Life. Since 2004, he has shared the messages of pro-life and chastity with thousands of teens and parents throughout the United States and Canada. After co-founding The King's Men in 2006, Mark launched his career forming men throughout the country on a variety of topics related to the development of authentic masculinity. He is 36 years old, married with two children, and lives in Quakertown, PA.



Damian Wargo, Director of Operations
215-906-8878
damian@thekingsmen.org

Damian Wargo, Co-Founder & Director of Operations for The King's Men, a dynamic and rapidly growing men's ministry founded in 2006, is passionate about building up men in the mold of leader, protector, and provider. Damian lectures on masculine spirituality and virtue formation, as well as conducts workshops on engaging in noble battles, especially anti-pornography activism. He also helps oversee the growth of The King's Men weekly formation groups throughout the country. In 2009, The King's Men launched an outdoor experiential weekend for men called "Into the Wild", which is expanding across the country. Damian is in charge of the development and implementation of this authentically masculine and tremendously successful experience for men. Prior to his fulltime work with The King's Men, Damian was a high school theology teacher. Damian is originally from Altoona, PA, and has his Bachelor's Degree in Accounting, and his Master's Degree in Education, both from Duquesne University in Pittsburgh. He is 37 years old and lives in Philadelphia, PA.

Men, Damian was a high school theology teacher. Damian is originally from Altoona, PA, and has his Bachelor's Degree in Accounting, and his Master's Degree in Education, both from Duquesne University in Pittsburgh. He is 37 years old and lives in Philadelphia, PA.

Dave DiNuzzo Sr., Director of Programming
412-475-8783
dave@thekingsmen.org

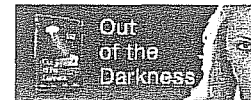
Dave DiNuzzo Sr., Director of Programming for The King's Men, is a 2004 graduate of Benedictine College in Atchison, Kansas, graduating with a BA in Business Administration and minor in Theology. Dave received his Master's Degree in Pastoral Theology with an emphasis in Evangelization and Catechesis from the Augustine Institute in Denver, Colorado. After his undergraduate studies, Dave worked as a Catholic lay missionary with

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Out of the Darkness



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FOCUS (Fellowship of Catholic University Students) and then went on to work as Director of Catholic Campus Ministry at the United States Air Force Academy. In 2006, Dave founded TrueManhood Men's Ministry in an attempt to capture the essence of manhood, manliness and a man's responsibility within the family, society, the Church and in the workplace. Dave has spoken all over the country on a variety of topics directly related to authentic masculinity, namely virtue and the fight against the evils of pornography. As Program Director, Dave oversees all existing and new start-up formation and activism group initiatives. Dave is also a volunteer firefighter for his local fire company. Dave is 30 years old, married and the father of three children.

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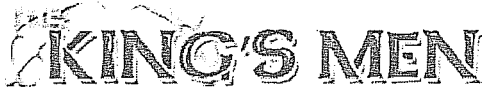
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EXHIBIT 5



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BUILDING MEN IN THE MOLD OF LEADER PROTECTOR & PROVIDER

Stop

Go "Into the Wild"

Book a TKM Speaker

Join a Men's Group

Engage in Noble Battles

No More Porn Tour

Overview



The multi-billion dollar pornography industry is out of control, unregulated, and destroying the common good. Pornography devastates families and the lives of millions of men and women who are caught in the snares of sexual addiction. By in large, the pornographers have been operating without any resistance.....until now! TKM strongly believes that every man is a protector, especially of women and children, both of whom are victimized by pornography. With over 200 stops, the No More Porn Tour is costing adult businesses "100's to 1000's of dollars" per protest. In fact, through the power of prayer and action

of TKM, five S.O.B.'s (sexually oriented businesses) that TKM has protested have shut down business! The No More Porn Tour is an opportunity to share the truth of God's plan for sex and marriage. At the protest, information is available on healing and freedom for those who are trapped in the slavery of addiction. Large signs and excellent literature about the dangers of pornography are distributed. The protest is charitable and emphasizes the message of true love. For a further explanation, click here.

Check Out Our Protest

Getting Started

Activism Checklist for Protesting Sexually Oriented Businesses

For comprehensive phone, email, and in-person support on starting a protest in the mold of the No More Porn Tour, contact Dave DiNuzzo, Director of Programming, at dave@thekingsmen.org or 412-475-8783

Victories

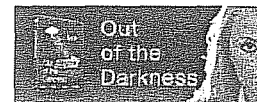
- Coyotes Shut Down
- "Just Sports" Will be Sold
- Signatures Strip Club Closes
- Strip Club Goes Family

Current Anti-Pornography Protest Locations

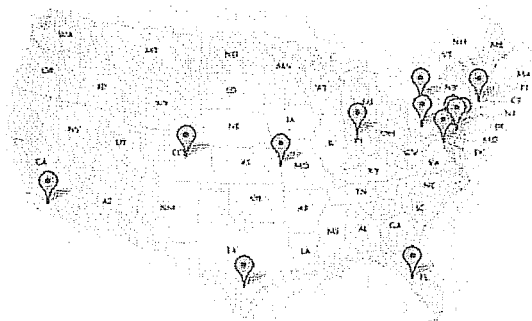
Events

- [Online Calendar](#)
- [Group Meetings](#)
- [Into the Wild Weekend](#)
- [No More Porn Tour](#)
- [Speaking Information](#)
- [Special Events](#)
- [Archive of Events](#)

Out of the Darkness



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TKM Inspired Pornography Protests

- Montgomeryville, PA
- Philadelphia, PA
- Collegeville, PA
- Latrobe, PA
- Arlington, VA
- Hartford, CT
- Indianapolis, IN
- Kansas City, KS
- Inglewood, CA
- San Antonio, TX
- Buffalo, NY
- Tampa Bay, FL

For more details including contacts, exact times of protests, and/or comprehensive phone, email, and in-person support on starting a protest in the mold of the No More Porn Tour, contact Dave DiNuzzo, Director of Programming, at dave@thekingsmen.org or 412-475-8783.

Previously Protested Locations

- Adult Forum Theater, Philadelphia, PA
- Adult Video Store 43rd & 8th Ave., New York, NY
- Adult Video Store, Latrobe, PA
- Adult World, Collegeville, PA
- Adult World, Montgomeryville, PA
- Adultcon, Los Angeles Convention Center, CA
- Coyotes Show Club, Quakertown, PA
- Defilais, Philadelphia, PA
- Excitement Video, Roslyn, PA
- Fantasies, Keyport, NJ
- First Amendment, Colorado Springs, CO
- Hollywood Nights, Indianapolis, IN
- Just Sports, Jamison, PA
- LAX Adult Video, Inglewood, CA
- Show N Tel, Philadelphia, PA
- Signatures, Philadelphia, PA
- The Body Shop, Hollywood, CA
- Video Outlet, Baltimore, MD
- Video-X-Press, Fraser, PA
- Video-X-Press, Horsham, PA
- Wholesale Lingerie Adult Store, Beltsville, MD

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EXHIBIT 6

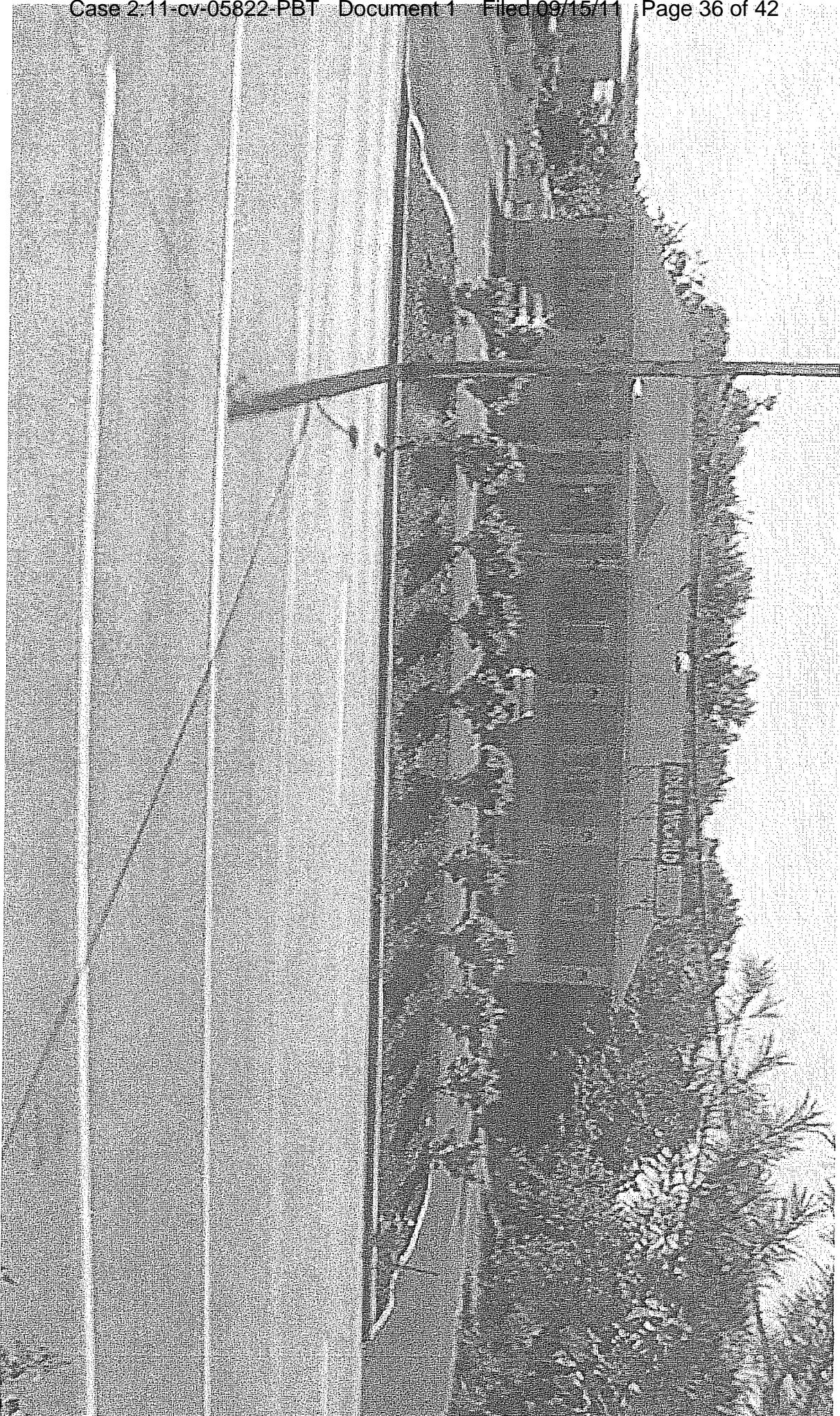


EXHIBIT 7

KING'S MEN Updates

www.thekingsmen.us

Dear Men,

August 17, 2011

Once again, I am delayed in getting this update letter done as we have been swamped with work. *The King's Men* (TKM) is in the midst of our Into the Wild season having just completed our 2nd of five ITWs in the Pocono Mountains August 11-14th. The month of July was a great month of preparation and planning for our TKM full-time staff.

The month kicked off with TKM traveling to the "Quo Vadis" retreat at Malvern Retreat House on Saturday July 2nd. I was blessed to speak to about 45 teenagers and young adults on the three roles of men: leader, protector and provider. These young men walked the Stations of the Cross and drew on our Lord's Passion for further insight into these roles.

The No More Porn Tour (NMPT) took place as usual on the first Wednesday of the month (7/6) at Adult World in Montgomeryville, PA. This NMPT featured a first for TKM. Program Director Dave DiNuzzo invited Father Michael Shea to join us to pray some prayers of deliverance over Adult World. Although this is not the first time a priest has joined us at NMPT, it is the first time that we prayed prayers of exorcism. We buried Miraculous Medals on the property and sprinkled Holy Water on the grounds. These prayers were very efficacious and powerful as the parking lot emptied during our time in prayer. Although the parking lot usually empties when we are present it was noticeably more vacant during our prayer time. The experience was a very positive one for the 20 men present. We hope to continue with our prayers of deliverance by inviting more priests to join us in our vigils. For more information about the Tour please visit www.thekingsmen.org.

On Saturday July 9th, TKM benefactors and supporters gathered in South Philadelphia for our annual Phillies game and tailgate party. We gathered once again at Stella Maris parish at 10th & Bigler for Mass at 12:00 PM. Following the celebration of the Holy Eucharist, over 100 TKM brothers and sisters shared in some delicious burgers and hot dogs. With our stomachs full, we walked a block to Citizens Bank Ballpark to watch the Philadelphia Phillies battle the Atlanta Braves. Although the Fightin Phils were not victorious in the game, the day was a great victory as we bonded greatly as a TKM family.

On Wednesday July 13th, TKM officially launched our apostolic work in the state of New Jersey. TKM brother Don Whicker kicked off this first of soon to be three formation and accountability groups in NJ. Ironically, where these men will be meeting in Cherry Hill, is at a crisis pregnancy center. If there is any place where strong men built in the mold of leader, protector and provider are needed, it is in the pro-life fight. For more information about our men's groups visit our website.

Also on Tuesday July 19th, TKM launched our first ever men's group in Lafayette, LA. This is the 2nd men's formation and accountability group in the state of LA. There was a great turnout of men at this kickoff event as the brothers in Covington, LA made the 2-hour drive up to Lafayette to show their support and solidarity as a band of TKM brothers.

On Friday July 22nd, close to 150 TKM supporters and activists came together in celebration of the closing of the former Coyotes Show Club in Quakertown, PA. In storybook fashion this once building of sin, which TKM protested from 2008-09, was transformed into Caitlyn and Cody's Family Fun Center and Diner.

-Mark J. Houck

EXHIBIT 8

The King's Men

Today September 2011 [Print](#) [Week](#) [Month](#) [Agenda](#)

Sun	Mon	Tue	Wed	Thu	Fri	Sat
28 TKM's 5th Anniversary	29 TKM Golf Outing	30 6pm Men's Night	31	Sep 1	2	3
4	5	6	7 4pm No More Porn Tour	8 ITW- Raccoon Creek State Park	9 10am Radio Program	10
11 ITW- Raccoon Creek	12 No More Porn Tour	13	14	15	16	17
18	19	20	21	22 10am Radio Program	23	24
25	26	27	28	29	30	Oct 1

No More Porn Tour

When Wed, September 7, 4pm – 8pm
Where Adult World, Montgomeryville, PA ([map](#))
Description We will be standing outside of Adult World in Montgomeryville, PA on Wednesday, April 6 between 4 and 8pm protesting pornography. Please join us for 1, 2, 3, or even 4 hours!! Please visit www.thekingsmen.org for more information about our No More Porn Tour and how you can help. We welcome men and women to join us in this fight

[more details»](#) [copy to my calendar»](#)

Events shown in time zone: Eastern Time

[Google Calendar](#)



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BUILDING MEN IN THE MOLD OF LEADER PROTECTOR & PROVIDER

Stop

Go "Into the Wild"

Book a TKM Speaker

Join a Men's Group

Engage in Noble Battles

The King's Men Mission

Under Christ the King's universal call to serve, we as men, pledge to unite and build up other men in the mold of leader, protector, and provider through education, formation and action.

Strip Club Goes Family

The efforts of The King's Men that led to the closing of Coyote's Show Club in Quakertown, PA in 2009 have paid off and have come full-circle. In a script that couldn't have been imagined, a family fun center and diner is now housed in the building where Coyote's previously conducted 'business'.



Get Updates by Email

Email:

Manly Minutes



Help Support TKM



Out of the Darkness



Click here to buy the DVD

Into the Wild



Coming to FIVE locations

- An Authentically Masculine Outdoor Experiential Weekend for Men
- * Leader, Protector, Provider Training
 - * Outdoor Skill Development
 - * Team Competitions
 - * Faith in Masculine Modality

"An extraordinary event - not a single man left the woods unimproved by the Spirit, I'm certain." -Vince, 35

"Into the Wild was the perfect mix of men's spirituality and outdoor training. I cannot wait for the next one!" -Justin, 28

You can register now, and pay later! Spots are already filling up

Upcoming Events



TKM Radio 1570AM, 1420AM
 Fri. 8/26/11 10-11am
 Re-aired Sat 2pm
 Guests: Damian Wargo and Dave DiNuzzo
www.holyspiritradio.org

"The King's Men LIVE" will air each Friday afternoon at 5pm for the ride home on WFJS 1260AM and 88.3 FM in New Jersey, or Listen Live online at www.DomesticChurchMedia.org.

No More Porn Tour
 Weds. 9/7/11 4:00-8:00pm
 Adult World Rts. 202 & 309
 Montgomeryville, PA (more info)

TKM Golf Tournament
 Join TKM for our 2nd Annual Golf Tournament at the beautiful and challenging Elus Bell Country

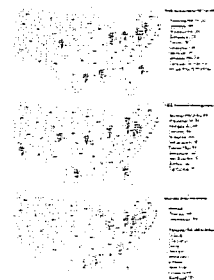
Formation Updates



GAINING MOMENTUM! The momentum that our groups are experiencing is staggering! As previously updated, 9 new groups started in the past several months. Continuing w/ that momentum, we're excited to announce several more groups have either started, are forming core team leadership and/or are planning kickoffs soon! We are blessed to see such tremendous growth as we know that formation & accountability in a man's life is so beneficial.

If you want to be involved in a group in your area, simply contact the facilitator and start attending the weekly meetings. It really is that easy! If your area doesn't have any groups yet, and you feel called to start a group in the mold of The King's Men, we can show you how. Click [HERE](#) for more

TKM Locations

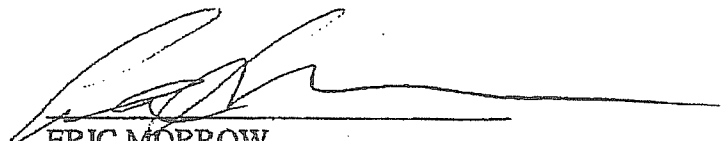


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- TKM Twitter

VERIFICATION

I, ERIC MORROW, am the President of Plaintiff in the aforementioned action and do hereby verify that the averments in the Verified Complaint in Equity are true and correct to the best of my knowledge, information and belief. I understand that this statement is subject to the penalties of 18PA. C.S. 4904 relating to unsworn falsification to authorities.



ERIC MORROW

Date: August 31, 2011