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COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss.

SUPERIOR COURT  
CIVIL ACTION NO.

COMMONWEALTH OF MASSACHUSETTS,

Plaintiff,

v.

NATIONALIST SOCIAL CLUB (a/k/a NSC-131),  
CHRISTOPHER HOOD, and LIAM MCNEIL,

Defendants.

**COMPLAINT**

**Introduction**

1. The Commonwealth brings this action against the defendants, the Nationalist Social Club, Christopher Hood and Liam McNeil (hereafter collectively “Defendants”), to address their escalating violations of the state’s civil rights laws, and the disruptions to public peace and safety caused by their unlawful conduct.

2. The Nationalist Social Club is a private association that is active in New England. Defendants Hood and McNeil direct and control the Club’s activities in Massachusetts.

3. Defendants have recently and repeatedly engaged in violent, threatening, intimidating, and coercive conduct that has interfered with the exercise of rights secured by state and federal law; unlawfully obstructed access to public accommodations, including libraries and hotels; and damaged, defaced, and unlawfully intruded upon property throughout Massachusetts.

4. The Commonwealth brings claims for public nuisance, trespass, civil conspiracy, and violations of the Civil Rights Act (G.L. c. 12, § 11H) and Public Accommodations Law (G.L. c. 272, § 98); and seeks injunctive relief, damages, civil penalties, costs and fees.

### Parties

5. The Commonwealth of Massachusetts is represented by and through its Attorney General.

6. The Attorney General's principal office is located at One Ashburton Place, Boston, Massachusetts 02108.

7. The Attorney General has the authority to bring this action in the public interest in her capacity as chief law enforcement officer for the Commonwealth and under G.L. c. 12, § 10; G.L. c. 12, § 11H; and G.L. c. 151B, § 9.

8. Defendant Nationalist Social Club, also known as NSC-131<sup>1</sup> (hereafter "NSC" or the "Club"), is an unincorporated association with approximately 30 active members in Massachusetts. NSC operates from the addresses of its leading members, Defendants Hood and McNeil, as set forth below.

9. NSC describes itself as a "Nazi" organization engaged in the "existential struggle" of "European peoples across the world fighting for their lives and honor." The Club engages in a range of activities that it claims are intended to identify and combat the "enemies" of "true white New Englanders." NSC's principal long-term objective is to establish a "homeland" in New England for white residents of European ancestry. Club members frequently reference this common objective using the slogan "New England is ours, the rest must go."

10. NSC exercises control over its membership. The Club's leadership, including Defendants Hood and McNeil, interview and vet potential members before admitting them into the association and authorizing them to participate in NSC's activities.

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<sup>1</sup> The numbers "1-3-1" in the acronym "NSC-131" stand for the letters "A-C-A" which, in turn, stand for "Anti-Communist Action."

11. Under the direction and control of the Club's leadership, NSC members carried out the unlawful activities described in this complaint to advance the association's common objectives. Club members attributed these unlawful activities to NSC.

12. Defendant Hood resides at 19 Christie Drive, Unit 2, Newburyport, Massachusetts 01950. He is a founding member of NSC and continues to hold a principal leadership position in the Club.

13. Defendant McNeil resides at 55 Montclair Avenue, Waltham, Massachusetts 02451. He joined NSC in or about 2020 and currently holds a leadership position in the Club.

14. Defendants Hood and McNeil are named as defendants in their individual capacity and as representative members of NSC pursuant to Rule 23.2 of the Massachusetts Rules of Civil Procedure.

15. Because NSC members take steps to conceal their identities during their activities in Massachusetts, including by wearing ski masks and other face coverings, the Commonwealth cannot currently identify each of the individual NSC members who participated in the unlawful activities described in this complaint.

16. Defendants Hood and McNeil will fairly and adequately represent the interests of the Club and its members in this action.

17. Defendants Hood and McNeil have publicly identified themselves as members of NSC and have promoted the activities and objectives of the Club.

18. Further, in their capacity as leaders of the Club, Defendants Hood and McNeil plan, direct and/or exercise control over NSC's activities in Massachusetts. Upon information and belief, Defendants Hood and McNeil also personally participated in the unlawful conduct described in this complaint.

### **Jurisdiction & Venue**

19. The court has jurisdiction over this case, and the authority to grant the relief requested, including under G.L. c. 12, § 11H; G.L. c. 151B, § 9; G.L. c. 212, § 4; and G.L. c. 214, § 1.

20. Venue is proper in Suffolk County under G.L. c. 223, § 5.

### **Facts**

21. NSC was founded by Defendant Hood and a small group of other Massachusetts residents in late 2019.

22. The Club began to engage in significant public activities in Massachusetts during the summer of 2020.

23. Since 2020, Defendants have engaged in an escalating campaign of unlawful conduct as they have attempted to “shut down” groups and activities that they deem harmful to the interests of white New Englanders.

24. As detailed below, Defendants have recently carried out a series of violent and otherwise unlawful Club actions targeting those they have designated “enemies of our people.”

25. Among these Club actions, Defendants have repeatedly attempted to disrupt public events organized by LGBTQ+ groups, and interfere with the provision of emergency shelter to recent immigrants at local hotels through the Commonwealth’s Emergency Housing Assistance program, as authorized by G.L. c. 23B, § 30 (hereafter “emergency shelter”).

26. Defendants have also periodically carried out vigilante “patrols” in cities and towns across the Commonwealth.

27. During these patrols, NSC members – some carrying dangerous weapons – have hunted for “anti-White” activity in residential neighborhoods, and trespassed upon and “tagged”<sup>2</sup> public and private property to claim territory for the Club.

28. Defendants’ conduct during these targeted actions, patrols, and other Club activities has repeatedly and substantially interfered with the public peace, safety, comfort, and convenience.

**Defendants Plan and Carry out Violent and Unlawful Conduct in Massachusetts:**

29. Defendants’ unlawful conduct in Massachusetts has involved a significant degree of planning and coordination among Club members.

30. As further described below, under the direction and control of the Club’s leadership, including Defendants Hood and McNeil, NSC members have selected targets; developed and planned tactics; acquired and distributed materials; organized travel; and carried out coordinated conduct during Club activities. For example:

31. In advance of Club activities, NSC members regularly scout targeted locations in order to familiarize themselves with the area. Defendants use the information gathered to develop operational tactics and create detailed “planning graphics” that identify parking and gathering points, primary and contingency access and exit routes, and potential chokepoints or danger areas near targeted locations.

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<sup>2</sup> As used in this complaint, the terms “tag,” “tagging,” and “tagged” refer to acts of vandalism in which Defendants painted graffiti, or placed stickers, containing “Nationalist Social Club,” “NSC,” “NSC-131,” or other identifying words, phrases or logos associated with the Club, onto public and private property without permission or right.

32. At the direction of the Club’s leadership, NSC members generally wear a standard “uniform” during sanctioned public activities. This uniform consists of khaki pants; black shirts or jackets; black ski masks, balaclavas or neck gaiters; and black or khaki hats.

33. During Club activities, NSC members regularly seek out and attempt to instigate fights and other physical confrontations.

34. To prepare Club members to engage in physical violence, Defendants periodically organize and provide combat and weapons trainings during which members practice fighting and engaging in coordinated maneuvers.

35. NSC members engage in aggressive and violent conduct during Club activities in an attempt to intimidate their “enemies” and to generate material for propaganda and recruiting videos.

36. NSC maintains active accounts in its own name on the social media platforms of Telegram, Gab, Odysee, and other sites.

37. The Club’s leadership, including Defendants Hood and McNeil, coordinate, contribute to, and exercise control over what is posted to these social media accounts.

38. Since 2020, Defendants have repeatedly posted videos and images to NSC’s social media accounts that have featured Club members carrying out assaults, fighting, and engaging in other physical confrontations.<sup>3</sup>

39. Defendants have given these videos and images titles such as “Join the Club” and “The Life,” and labeled Club members who engage in physical violence as the “Bully Squad.”

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<sup>3</sup> Defendants frequently cross-post material to several social media platforms. For ease of reference, the Commonwealth will generally refer to Defendants’ “social media accounts” unless the particular platform used is relevant.

40. NSC members wearing patches and other clothing bearing the insignia “Bully Squad” participated in the unlawful activities described in this complaint.

**Defendants Unlawfully Target and Disrupt LGBTQ+ Events:**

41. Between July 2022 and January 2023, Defendants carried out a campaign of Club actions intended to “disrupt and shut down” Drag Queen Story Hour events organized by LGBTQ+ community groups and allied organizations in Massachusetts.

42. During this campaign, uniformed NSC members engaged in street fighting, assaulted members of the public, and interfered with access to event spaces in public libraries.

43. A Drag Queen Story Hour is a family-oriented event during which a performer in drag reads picture books to parents and young children.

44. The events are organized for the intended purpose of promoting LGBTQ+ inclusivity and equality by bringing parents and children together with openly queer and gender-fluid community members in a family-friendly setting.

45. Over the last decade, hundreds of Story Hour events have been lawfully and peacefully held in public libraries, schools, and other event spaces in Massachusetts and across the country.

46. NSC has repeatedly indicated that it targeted the Drag Queen Story Hour events because of the sexual orientation and/or gender identity of the people involved in organizing the events, the performers at the events, and/or the people attending the events. For example:

47. During 2022 and 2023, NSC published and distributed a flyer titled “Defend the Family,” in which it indicated that the Club was targeting Story Hours because the events were used to promote “harmful and degenerate lifestyles such as homosexuality, transsexuality, and ‘drag culture.’”

48. In addition, during Club actions targeting Story Hour events, NSC members repeatedly displayed homophobic banners and shouted anti-LGBTQ+ slogans and slurs, including “faggot.”

49. NSC first announced that its members were going to carry out coordinated actions intended to force the cancellation of Story Hour events in late 2021.

50. On December 21, 2021, NSC posted a video to its social media accounts in which it stated that Club members would “SHUT DOWN DRAG QUEEN STORY HOURS IN THE NEW ENGLAND AREA UNTIL ALL RELATED EVENTS CEASE.”

51. Defendants first targeted a Story Hour event in Massachusetts on July 23, 2022.

52. On July 23, approximately twenty NSC members traveled to Jamaica Plain to attempt to “shut down” a Story Hour being held at the Loring Greenough House, a historical landmark building presently used as a nonprofit community center for social, cultural, historical, and educational activities.

53. When the NSC members arrived at the Loring Greenough House, officers from the Boston Police Department were patrolling the area outside the public entrance to the building.

54. As a result, the NSC members congregated on the sidewalk outside the public entrance.

55. After a short time, a group of people gathered across the street to protest NSC’s presence and activities outside the Loring Greenough House.

56. In response, the NSC members began yelling insults and performing Nazi salutes at the protesters.

57. After approximately an hour and a half, the NSC members left the sidewalk outside the Loring Greenough House and began walking toward the parking lot where they had left their cars.

58. After traveling about half a block, several Club members broke away from the main group and crossed the street – moving away from the parking lot – to confront the protesters at close range.

59. This conduct provoked an escalating conflict that continued back across the street and culminated in a street fight involving Defendant Hood in Greenough Avenue. Multiple police officers were forced to intervene to break up the fight.

60. After the event, NSC posted a video to its social media accounts in which it threatened that those organizing and supporting future Story Hour events would “BE ALLOWED NO PEACE, NO REST, AND NO FUTURE IN NEW ENGLAND”; stated that, as a result of Club members’ activities at the Loring Greenough House, “POLICE ESCORTED THE DRAG QUEEN OUT THE BACK DOOR”; and reaffirmed that members would continue to attempt to “DISRUPT AND SHUT DOWN” Story Hour events in Massachusetts.

61. On August 8, 2022, NSC targeted a second Story Hour being held in the Boston Seaport at an event space on Harbor Way.

62. The Story Hour was canceled by organizers due to safety concerns after approximately twenty NSC members arrived in a group and lined up in formation immediately in front of the public entrance to the building.

63. On December 10, 2022, NSC targeted a third Story Hour being held at the Public Library on North Main Street in Fall River.

64. Approximately twenty NSC members traveled to Fall River to “disrupt and shut down” the event.

65. During the Story Hour, several NSC members assaulted two people associated with the LGBTQ+ community group that had organized the event (hereafter “Victim 1” and “Victim 2”).

66. When the NSC members arrived at the Library there was no observable police presence in the area.

67. Uniformed Club members quickly set up two lines obstructing access to the main entrance to the Library from North Main Street.

68. NSC also deployed members dressed in “civilian” clothing to act as spotters, observing the area and looking out for law enforcement.

69. The uniformed NSC members in front of the library displayed a banner that read “DRAG QUEENS ARE PEDOPHILES,” and began loudly chanting “Faggots” and other anti-LGBTQ+ slogans at a group of people who had gathered in the Library entranceway.

70. After several minutes, two masked NSC members attempted to enter the Library in order to “disrupt and shut down” the Story Hour.

71. When the first Club member attempted to open the Library door, he pulled it into Victim 1 who was standing directly in the entranceway.

72. The NSC member then shoved Victim 1 in the face and neck, pushing him against the wall next to the entrance.

73. Approximately eight additional NSC members then charged toward the Library entrance, surrounding Victim 1 and Victim 2, who was also standing in the doorway.

74. Several of the NSC members began shoving Victim 2; they then grabbed him, threw him to the ground, and began kicking and/or stomping on him.



75. After approximately 10 seconds, the NSC members began retreating down the stairs and rejoined the main group.

76. After the assault, a number of officers from the Fall River Police Department arrived at the Library.

77. The NSC members remained in front of the Library for some time and then left in an organized group.

78. NSC's conduct in Fall River reasonably caused people to become frightened and apprehensive, to fear for their physical safety, and to feel constrained in their ability to peacefully access the Public Library and attend Story Hour events.

79. On January 14, 2023, NSC targeted a fourth Story Hour being held at the Public Library on Pleasant Street in Taunton.

80. During this event, NSC members entered the Library and disrupted the Story Hour, scaring families and small children and causing officers from the Taunton Police Department to evacuate the performer through a side entrance.

81. On January 14, approximately thirty NSC members traveled to Taunton to “disrupt and shut down” the Story Hour.

82. As in Fall River, after arriving, uniformed NSC members lined up in formation obstructing access to the main entrance to the Library from Pleasant Street. The members held up the “DRAG QUEENS ARE PEDOPHILES” banner and began shouting anti-LGBTQ+ slogans.

83. After approximately thirty minutes, a group of five uniformed NSC members entered the Library in order to “disrupt and shut down” the Story Hour.

84. After walking through the Library halls, the NSC members burst into a room full of families with small children without warning, wearing ski masks, sunglasses, and black jackets, and carrying backpacks and/or other bags.

85. Because of the NSC members’ appearance and the manner in which they entered the room, the Story Hour performer and others reasonably feared that the NSC members were going to carry out a violent attack.

86. Approximately half of the parents at the event immediately grabbed their children and left the Library.

87. Volunteers from the group that had organized the event quickly attempted to separate the remaining families from the NSC members.

88. Officers from the Taunton Police Department, who were at the Library because of the NSC activity, also remained in the room to monitor the situation.

89. The NSC members then began to loudly harass, and attempt to intimidate, the remaining families and the performer, further disrupting the event. For example, NSC members called out to parents that they were helping to “groom” their children for sexual abuse; they also called the performer a “pedophile,” a “street whore,” and other insults.

90. One NSC member aggressively approached a parent and attempted to instigate a fight. The Club member was removed from the room by police officers.

91. Another NSC member raised his hand in the shape of a gun and made a shooting gesture in the direction of parents and the performer.



92. As a result of this conduct, a few minutes after the NSC members entered the room, the performer indicated that she felt unsafe and could not continue to read to the remaining families.

93. The Story Hour was then canceled.

94. As the performer was being escorted from the room toward the exit, several of the NSC members rushed toward her but were blocked by police officers.

95. After the event, NSC posted a video to its social media accounts in which it claimed credit for “SHUT[TING] DOWN A DRAG QUEEN STORY HOUR IN TAUNTON.”

96. After January 14, the LGBTQ+ community group that had organized the Taunton Story Hour stopped publicly disclosing the location of its events because of safety concerns caused by the NSC members' conduct.

**Defendants Unlawfully Target Immigrants Based on Race and National Origin and Interfere with the Provision of Emergency Shelter:**

97. Between October 2022 and October 2023, NSC carried out a series of Club actions intended to interfere with the provision of emergency shelter to recent immigrants at local hotels.

98. NSC has repeatedly stated that it carried out these actions because of the perceived race (non-white) and national origin (non-European) of the immigrants staying at the hotels. For example:

99. NSC has posted videos and statements to its social media accounts indicating that the immigrants receiving shelter at the hotels were "INVADERS" from "HAITI," "CENTRAL AMERICA," or "AFRICA" who – according to NSC – had come to the United States as part of a conspiracy to replace white Americans of European ancestry. NSC has referred to this conspiracy as "RACIAL REPLACEMENT" or "WHITE REPLACEMENT."

100. NSC has further indicated that it carried out the Club actions in an attempt to coerce the hotels to deny emergency shelter to non-white, non-European immigrants; and to coerce non-white, non-European immigrants to leave the hotels and the Commonwealth.

101. NSC has used similar tactics to target multiple hotels. For example:

102. On October 30, 2022, approximately twenty-five NSC members traveled to Kingston and targeted the Baymont Inn and Suites hotel.

103. Uniformed NSC members marched onto hotel property and lined up in the private driveway opposite the main entrance, obstructing access to the hotel.

104. The NSC members held up a banner that read “REFUGEES NOT WELCOME” and loudly chanted slogans, including “Go Home” and “New England is ours, the rest must go.”

105. At least one NSC member used a bullhorn or other noise amplification device.

106. NSC’s conduct disturbed guests and employees inside the hotel.

107. After a short time, an employee came out of the hotel and directed the NSC members to get out of the driveway and leave the hotel’s property. The Club members did not do so.

108. The NSC members left the hotel property only after officers from the Kingston Police Department arrived and warned them that they were trespassing.

109. In a similar incident, on August 27, 2023, approximately twenty NSC members traveled to Woburn and targeted the Red Roof Inn, Crowne Plaza, and Sonesta Select hotels.

110. Uniformed NSC members repeatedly entered onto the hotel properties, lined up in the private driveways or parking lots opposite the hotel entrances, and burned flares and chanted anti-immigrant slogans loudly enough to disturb guests and employees at the hotels.

111. At the Red Roof Inn, at least one NSC member recorded video of guests and/or employees inside the hotel without their consent.

112. NSC subsequently posted an image of a guest on its social media accounts, identifying him as a “Haitian invader.”

113. In another incident, on September 1, 2023, approximately twenty NSC members traveled to Marlborough and targeted the Extended Stay America hotel.

114. As in Kingston and Woburn, uniformed NSC members marched onto hotel property and lined up in the driveway opposite the main entrance, blocking a lane of traffic and obstructing access to the hotel. The Club members burned flares, displayed a banner that read

“Invaders Go Home,” and shouted slogans such as “Refugees Go Home” loudly enough to disturb guests and employees inside the hotel.



115. Shortly after the NSC members entered onto the hotel’s property, guests began calling the police, calling the front desk, and/or coming down to the lobby to report to the on-duty hotel staff member that they were frightened and intimidated by the Club members’ conduct.

116. The hotel employee – who was a pregnant woman of color working alone – also called the police because she was concerned for her safety and that of the hotel’s guests.

117. In addition, at the employee’s request, several guests went to the entrance and directed the NSC members to leave the hotel property. The Club members did not do so.

118. Instead, a uniformed NSC member broke away from the main group, entered the hotel holding a black metallic object in front of him, and advanced on the hotel employee who was standing near the entrance.

119. The hotel employee – who initially thought the Club member was holding a handgun or other weapon – retreated in fear away from the entrance.

120. The NSC member was actually holding a GoPro style camera with a small handle. He recorded video of the employee and guests without their consent and then exited the hotel.

121. Shortly thereafter, the NSC members left the hotel's property before police arrived.

122. NSC subsequently posted a video to its social media accounts that included footage of the employee, together with statements indicating that the Club had targeted the hotel because it was "GUILTY OF COOPERATING" with the Commonwealth's emergency shelter program and was "HOUSING OVER A HUNDRED HAITIAN INVADERS AND THEIR FAMILIES."

123. As a result of NSC's activities, Extended Stay America began securing the internal doors by the main entrance to the hotel and hired additional security personnel.

**Defendants Unlawfully Attack Members of the Public Exercising Protected Rights:**

124. In addition to the discriminatory actions above, Defendants have also engaged in threatening, intimidating, and coercive conduct targeting members of the public who were simply unlucky enough to be present while NSC members were carrying out Club activities. For example:

125. On November 13, 2022, uniformed NSC members threatened and intimidated pedestrians outside the "Boston Anarchist Bookfair," which was being held at an event space called the Democracy Center in Cambridge.

126. The Bookfair is an annual event that is open to the public and features book sales, seminars, and workshops.

127. On November 13, approximately ten NSC members traveled to Cambridge in two large cargo vans to attempt to shut down the Bookfair.

128. After arriving at the Democracy Center, the NSC members began shouting slogans, performing Nazi salutes, and banging on windows, causing volunteers to temporarily

secure the doors in order to protect people inside. The NSC members then attempted to kick down doors and pull open windows.

129. After determining that they would be unable to enter the Democracy Center, the NSC members turned on pedestrians who were standing across the street observing their activities.

130. Several uniformed Club members walked into the street, screaming insults and obscenities and challenging people to fight.

131. One Club member approached a man who was pushing his small children in a stroller and began shouting and aggressively gesturing in the man's face.

132. Another Club member charged across the street, gesturing at another pedestrian and screaming, "You want to punch a fucking Nazi? Come on motherfucker! What? Yeah, back up bitch! Get the fuck out of here you bitch!"

133. After the pedestrians began to retreat and disperse, the NSC members left the area in an organized group.

**Defendants' Patrol Activity Disrupts Public Peace and Safety:**

134. Since late 2020, NSC has carried out dozens of "patrols" during which members have damaged public and private property and engaged in other dangerous and unlawful conduct.

135. NSC has stated that it carries out patrols in order to "take back security in our homelands" and demonstrate to the Club's enemies that they have "nowhere to hide."

136. In practice, this means that uniformed Club members roam public streets and neighborhoods – generally at night – defacing property, seeking out physical confrontations with their "enemies," and otherwise causing a disruption and threat to public peace and safety.

137. NSC has posted photographs and videos to its social media accounts indicating that its members carry dangerous weapons during patrols, including knives and telescoping riot batons.

138. During patrols, NSC members routinely engage in “tagging” by affixing stickers to, or spray-painting slogans on, utility poles, road signs, construction equipment, bridges, overpasses, and other public and private property in, along, and immediately adjacent to public roads.

139. The stickers NSC uses to tag property commonly include the phrase “NSC – 131 Zone” and/or direct members of the public to report “anti-White” activity to the Club.

140. Since late 2020, NSC has carried out patrols during which members tagged property in, along, and immediately adjacent to public roads in Boston, Lowell, Worcester, Fitchburg, Tyngsborough, Waltham, Salem, Pepperell, Holden, Ayer, and other communities in eastern and central Massachusetts.

141. The Club has also carried out similar patrols of the MBTA system in and around Boston.

142. Beginning in early 2022, in addition to tagging property with spray-paint and stickers during patrols, NSC began to regularly carry out “banner drops” from bridges and overpasses along the Interstate and primary highway systems in Massachusetts in a manner that created a further risk to public safety. For example:

143. On February 12, 2022, in connection with a patrol of the MBTA system, approximately fifteen NSC members walked to the Fairfield Street bridge in Boston and conducted a banner drop over multiple lanes of traffic on Storrow Drive.

144. The uniformed Club members stood in groups on each side of the bridge and haphazardly and insecurely affixed large white sheets with painted slogans to the railings, obscuring at least one official road sign and creating a traffic hazard.

145. The Club members also obstructed pedestrian access to the bridge. Pedestrians heading in both directions were forced to walk a single file gauntlet through the groups of NSC members congregating on each side the bridge, while at least one member recorded them as they passed.

146. At one point, a pedestrian crossing the bridge objected to the NSC members' conduct and began recording their activities using a cell phone.

147. In response, at least one NSC member began to follow the pedestrian across the bridge.

148. When the pedestrian reached approximately the halfway point over the bridge, another Club member let go of the section of banner he was holding and performed a Nazi salute at the pedestrian as she was approaching. The pedestrian briefly stopped and grabbed the section of banner next to the member, attempting to pull it loose from the railing.

149. Three more NSC members then charged at the pedestrian and began shouting in her face, surrounding her and forcing her up against the railing of the bridge.



150. One of the NSC members then swung at the pedestrian, striking her in the arm and knocking the phone out of her hand onto the bridge.

151. In mid-2022, NSC further expanded its patrol activities to include throwing bags filled with leaflets and rocks, wood pellets, rock salt and/or other ballast material (hereafter “bags filled with leaflets and rocks”) from moving cars onto public and private property.

152. Between July 2022 and October 2023, NSC members drove through residential neighborhoods and threw bags filled with leaflets and rocks onto public and private property in Ipswich, Hamilton, New Bedford, Plymouth, Westfield, and other cities and towns. For example:

153. On the nights of September 28 and 29, 2023, NSC members drove through residential neighborhoods near Morton Park in Plymouth and threw large numbers of bags filled with leaflets and rocks onto properties located on Stillwater Drive, Stone Gate Drive, Charlotte Drive, Cracstone Road, Priest Road, Carver Road, and Gristmill Road.

154. NSC did not have permission or consent from the impacted property owners to engage in this activity; many residents called the police to complain about the activity.

### **Claims**

#### **Count I: Violations of Civil Rights Act (G.L. c. 12, § 11H) Asserted Against All Defendants**

155. The Commonwealth realleges and incorporates the preceding paragraphs.

156. Defendants have unlawfully interfered, or attempted to interfere, by threats, intimidation or coercion, with the exercise and enjoyment of rights secured by the laws and constitutions of the Commonwealth and the United States. Without limiting the foregoing:

157. On February 12, 2022 at the Fairfield Street bridge, and again on November 13, 2022 in Cambridge, Defendants interfered, or attempted to interfere, by threats, intimidation or coercion, with the right to access, use, and enjoy places of public accommodation, including

public roads and sidewalks, as secured by G.L. c. 272, § 98; and the right to personal safety and security, as secured by Article 1 of the Declaration of Rights and G.L. c. 265, § 13A.

158. On December 10, 2022 in Fall River, Defendants interfered, or attempted to interfere, by threats, intimidation or coercion, with the right to access, use, and enjoy places of public accommodation, as secured by G.L. c. 272, § 98; the right to personal safety and security, as secured by Article 1 of the Declaration of Rights and G.L. c. 265, § 13A; and the rights to freedom of speech, association, and/or assembly, as secured by Articles 16 and 19 of the Declaration of Rights.

159. On January 14, 2023 in Taunton, Defendants interfered, or attempted to interfere, by threats, intimidation, or coercion, with the right to access, use, and enjoy places of public accommodation, as secured by G.L. c. 272, § 98; the right to personal safety and security, as secured by Article 1 of the Declaration of Rights and G.L. c. 265, § 13A; and the rights to freedom of speech, association, and/or assembly, as secured by Articles 16 and 19 of the Declaration of Rights.

160. On September 1, 2023 in Marlborough, Defendants interfered, or attempted to interfere, by threats, intimidation, and coercion, with the right to access, use, and enjoy places of public accommodation, as secured by G.L. c. 272, § 98; the right to seek and receive emergency shelter, as secured by G.L. c. 23B, § 30; the right to personal security and safety, as secured by Article 1 of the Declaration of Rights and G.L. c. 265, § 13A; and the right to pursue lawful business activities and occupations, as secured by Articles 1 and 10 of the Declaration of Rights.

161. Defendants' conduct, if repeated, would cause a reasonable person under the circumstances to feel threatened, intimidated, or coerced in the exercise and enjoyment of these secured rights.

**Count II: Violations of Public Accommodations Law (G.L. c. 272, § 98 and c. 151B, § 9)  
Asserted Against All Defendants**

162. The Commonwealth realleges and incorporates the preceding paragraphs.

163. Defendants have engaged in conduct that constitutes a distinction, discrimination, or restriction relative to the admission of one or more people to, or their treatment in, places of public accommodation on account of sexual orientation, gender identity, race, and national origin, and/or aided or incited such distinction, discrimination or restriction. Without limiting the foregoing:

164. On December 10, 2022 in Fall River, and again on January 14, 2023 in Taunton, Defendants obstructed and interfered with access to, and the use and enjoyment of, a public library, and engaged in physically violent, threatening, intimidating and coercive misconduct, in order to “disrupt and shut down” Story Hour events because of the actual or perceived sexual orientation and/or gender identity of the people involved in organizing the events, the performers at the events, and/or the people attending the events.

165. On October 30, 2022 in Kingston, August 27, 2023 in Woburn, and again on September 1, 2023 in Marlborough, Defendants trespassed onto private property and obstructed access to, and/or interfered with the operation of, a hotel because of the actual or perceived race and national origin of guests receiving emergency shelter and services at the hotel.

166. Prior to filing this action, the Commonwealth filed an administrative complaint with the Massachusetts Commission Against Discrimination alleging that Defendants’ conduct violated G.L. c. 272, § 98.

167. On or about December 6, 2023, the Commission authorized the Commonwealth to withdraw the administrative complaint and file this action under G.L. c. 151B, § 9.

**Count III: Public Nuisance  
Asserted Against Defendants Hood and McNeil**

168. The Commonwealth realleges and incorporates the preceding paragraphs.

169. NSC's members, including Defendants Hood and McNeil, have engaged in conduct that has unreasonably interfered with the exercise and enjoyment of public rights.

Without limiting the foregoing:

170. NSC members have engaged in public fighting, and other violent, threatening, tumultuous and unlawful conduct, that unreasonably disrupted the public peace, safety, comfort and convenience, and/or otherwise interfered with public rights, in connection with the incident at the Fairfield Street bridge on February 12, 2022; the incident in Cambridge, on November 13, 2022; the incidents targeting Drag Queen Story Hours in Jamaica Plain on July 23, 2022, Fall River on December 10, 2022, and Taunton on January 13, 2023; and the incidents targeting hotels providing emergency shelter to immigrants in Kingston on October 30, 2022, Woburn on August 27, 2023, and Marlborough on September 1, 2023.

171. Further, in connection with their patrol activities of "tagging" and throwing bags filled with leaflets and rocks from cars, NSC members have repeatedly and unlawfully damaged, defaced, encroached and intruded upon public and private property in such a manner as to cause a common public injury and/or otherwise interfere with public rights.

**Count IV: Trespass  
Asserted Against Defendants Hood and McNeil**

172. The Commonwealth realleges and incorporates the preceding paragraphs.

173. During the course of, and in connection with, engaging in activity that violated the Massachusetts Civil Rights Act (G.L. c. 12, § 11H) and/or the Public Accommodations Law (G.L. c 272, § 98), and/or constituted or contributed to the creation of a nuisance, NSC's

members, including Defendants Hood and McNeil, have repeatedly, intentionally and without permission or right entered, invaded, or otherwise trespassed upon public and private property throughout the Commonwealth. Without limiting the foregoing:

174. On October 30, 2022 in Kingston, August 27, 2023 in Woburn, September 1, 2023 in Marlborough, and in connection with their patrol activities of “tagging” and throwing bags filled with leaflets and rocks from cars in various towns and cities between 2020 and 2023, NSC members have committed trespasses.

**Count V: Conspiracy  
Asserted Against Defendants Hood and McNeil**

175. The Commonwealth realleges and incorporates the preceding paragraphs.

176. NSC’s members, including Defendants Hood and McNeil, have acted in concert, and pursuant to a common design, to commit the unlawful and tortious acts described in this complaint.

177. Further, NSC’s members, including Defendants Hood and McNeil, have knowingly encouraged, and provided substantial assistance to each other, in committing the unlawful and tortious acts described in this complaint.

**WHEREFORE**, the Commonwealth respectfully requests that the Court enter an order:

(A) Enjoining Defendants from engaging in conduct that violates G.L. c. 12, § 11H;

(B) Enjoining Defendants from engaging in conduct that violates G.L. c. 272, § 98;

(C) Enjoining Defendant Hood, Defendant McNeil, and all other members of the Nationalist Social Club from engaging in conduct that constitutes, creates, or contributes to the creation of a public nuisance;

(D) Enjoining Defendant Hood, Defendant McNeil, and all other members of the Nationalist Social Club, from unlawfully trespassing on public and private property;

- (E) Enjoining Defendant Hood, Defendant McNeil, and all other members of the Nationalist Social Club from conspiring to engage in conduct that violates G.L. c. 12, § 11H; conduct that violates G.L. c. 272, § 98; conduct that constitutes, creates, or contributes to the creation of a public nuisance; and/or conduct that constitutes unlawful trespass;
- (F) Awarding civil penalties, damages, costs and reasonable attorney's fees; and
- (G) Granting such additional relief as may be necessary or appropriate.

**Jury Demand**

The Commonwealth demands a trial by jury on all issues that are properly triable by a jury.

Respectfully submitted,

COMMONWEALTH OF MASSACHUSETTS  
ANDREA JOY CAMPBELL  
ATTORNEY GENERAL

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