

**FILED**

JUN 13 2016

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
BY  DEPUTY

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
ALPINE DIVISION**

**FREEDOM FROM RELIGION §  
FOUNDATION, INC.; KEVIN PRICE; §  
and JESSE CASTILLO, §  
Plaintiffs, §**

**CIVIL ACTION NO.: 4:16-cv-14**

**-vs-**

**PLAINTIFFS' ORIGINAL §  
COMPLAINT FOR DECLARATORY §  
JUDGMENT, INJUNCTIVE RELIEF, §  
AND NOMINAL DAMAGES §**

**BREWSTER COUNTY, TEXAS, and §  
SHERIFF RONNY DODSON in his §  
official and individual capacities, §  
Defendants. §**

**CONSENT DECREE AND ORDER**

WHEREAS, Plaintiffs FREEDOM FROM RELIGION FOUNDATION, INC., KEVIN PRICE, and JESSE CASTILLO (collectively, "Plaintiffs") filed this lawsuit on March 2, 2016, alleging that Defendants, BREWSTER COUNTY, TEXAS and SHERIFF RONNY DODSON (collectively, "Defendants"), placed or allowed to be placed Latin cross decals on Brewster County Sheriff's Office patrol vehicles in violation of the Establishment Clause of the First Amendment and Article I, Section 6 of the Texas Constitution;

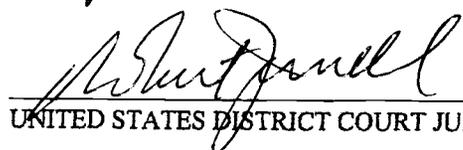
WHEREAS, as a matter of expediency, the Parties wish to finally resolve all matters arising out of the conduct described in this lawsuit, and all claims or counterclaims brought, or which could have been brought, in this lawsuit, as of the date of execution of this Consent Decree and Order;

WHEREAS, the Parties recognize, and the Court by executing this Consent Decree and Order finds, that this Consent Decree and Order has been negotiated in good faith and that it is a fair and reasonable resolution of the matters and constitutional claims set forth in this lawsuit;

NOW, THEREFORE, without any admission of fact or law, it is hereby ORDERED as follows:

- 1) Defendants are hereby enjoined from displaying, or allowing others to display, any Latin cross decals, either standing alone or as part of a larger display, on Brewster County Sheriff's Office vehicles.
- 2) Defendants will ensure the removal of all Latin cross decals from all Brewster County Sheriff's Office vehicles within seven days of the execution of this Consent Decree and Order.
- 3) Defendant Brewster County, Texas shall pay Plaintiffs Kevin Price and Jesse Castillo the sum of one dollar (\$1.00) each for nominal damages for past constitutional violations within ten days of the execution of this Consent Decree and Order.
- 4) This Consent Decree shall not be construed as an admission of liability and is entered into solely to resolve the claims brought forth in this lawsuit and to rectify claimed constitutional violations associated with the displays at issue in this lawsuit.
- 5) Defendant shall pay Plaintiffs for their reasonable attorneys' fees and costs incurred in this matter, payable to Law Office of Randall L Kallinen PLLC, in the amount of \$21,970 for attorneys fees and \$400 for costs, payable within ten days of the execution of this Consent Decree and Order.
- 6) This Consent Decree and Order shall be deemed to have been served at the time of its execution by the Court, and the case shall be concluded upon entry of this Consent Decree and Order.
- 7) In the event that any court of competent jurisdiction determines that any provision of this Consent Decree and Order, or any part thereof, cannot be enforced, such determination shall not affect or invalidate the remainder of this Consent Decree and Order.
- 8) The Court expressly retains jurisdiction over this matter after entry of this Consent Decree and Order to enforce compliance with the terms herein and to take any action necessary for the interpretation of terms or adjudication of disputes.
- 9) This Consent Decree and Order may be signed by the Parties in counterparts and each such counterpart signature shall be given full force and effect.

SO ORDERED, THIS 13<sup>th</sup> DAY OF ~~MAY~~ June, 2016.

  
UNITED STATES DISTRICT COURT JUDGE

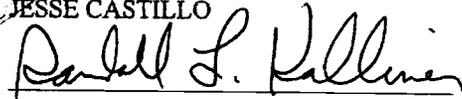
By their signatures the undersigned parties agree to, and request entry of, this Order:

FREEDOM FROM RELIGION FOUNDATION, INC.

By: Annie Laurie Gaylor  
Printed Name: Annie Laurie Gaylor  
Title: Co-President

  
KEVIN PRICE

  
JESSE CASTILLO

  
RANDALL KALLINEN  
Attorney for Plaintiffs

BREWSTER COUNTY, TEXAS

By: \_\_\_\_\_  
Printed Name: \_\_\_\_\_  
Title: \_\_\_\_\_

\_\_\_\_\_  
RONNY DODSON

\_\_\_\_\_  
GREG HUDSON  
Attorney for Defendants

SO ORDERED, THIS 12<sup>th</sup> DAY OF June MAY, 2016.

  
UNITED STATES DISTRICT COURT JUDGE

By their signatures the undersigned parties agree to, and request entry of, this Order:

FREEDOM FROM RELIGION FOUNDATION, INC.

By: \_\_\_\_\_  
Printed Name: \_\_\_\_\_  
Title: \_\_\_\_\_

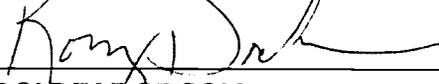
\_\_\_\_\_  
KEVIN PRICE

\_\_\_\_\_  
JESSE CASTILLO

\_\_\_\_\_  
RANDALL KALLINEN  
Attorney for Plaintiffs

BREWSTER COUNTY, TEXAS

By: \_\_\_\_\_  
Printed Name: Eleazar R. Cano  
Title: Brewster County Judge

  
\_\_\_\_\_  
RONNY DODSON

\_\_\_\_\_  
GREG HUDSON  
Attorney for Defendants