

VIRGINIA

IN THE CIRCUIT COURT FOR THE CITY OF NORFOLK

ARMED FORCES BREWING COMPANY, INC.,

Plaintiff,

v.

Case No. CL26005167-00

ANDREW MICHAEL COPLON;

STACIE COPLON;

ROBERT GREY "BUTCH" BRACKNELL;

SECRET HOPPER, LLC d/b/a CRAFT BEER PROFESSIONALS;

**CITIZENS FOR A BETTER NORFOLK ("CFABN"), an unincorporated
association;**

and

ZACH D. ROBERTS;

Defendants.

COMPLAINT

COMES NOW the plaintiff Armed Forces Brewing Company, Inc. ("AFBC" or "Plaintiff"), by counsel, and for its Complaint against Defendants, avers as follows:

NATURE OF THE ACTION

1. This case arises from the Defendants' combined and prolonged tortious interference with AFBC's contracts and business expectancies through improper methods, causing significant commercial harm and damages to AFBC's business (loss of gross and net revenues from the sale of beer and merchandise), business reputation and brand, valuation, investor relations, the company's goal of an initial public offering of its stock, and such other damages Plaintiff will prove at trial. Defendants sought to isolate AFBC commercially by pressuring and discouraging third parties from doing business with AFBC. To that end, the Defendants used real and anonymous (for

amplification) social media and email accounts to message community stakeholders and the public at large, disseminating derogatory and disparaging false information about AFBC. The defendants used their media contacts, channels and relationships to push overreaching and hyperbolic disparaging narratives about AFBC through fanatical media stories, repeating false and derogatory statements about AFBC. The Defendants villainized AFBC as a company that fosters a culture of hate and intolerance for the LGBTQ community when, in fact, AFBC hired and employed members of the LGBTQ community at their Norfolk brewery, priding themselves on promoting equal opportunities and adhering to employment practices founded upon meritocracy. The Defendants employed intimidation tactics and organized pressure campaigns targeting AFBC's business relationships with community partners (public, charitable, and business-to-business partners), and engaged in targeted tortious interference via improper methods towards AFBC's vendors (such as food trucks, in particular), investors, civic and charitable organizations/partners AFBC engaged with, event operators, distributors, and their business relationships with their employees, among others. Defendants also published and amplified false and disparaging statements about AFBC's solvency, the ethics of its CEO (accusing him of a stolen valor felony), bankruptcy status, and alleged intolerance for and hostility towards the LGBTQ community, and other unethical conduct.

2. Defendants combined, associated, mutually agreed and undertook together, to willfully and maliciously injure the business and reputation of AFBC without any lawful justification whatsoever, by; (i) developing, implementing and coordinating social-media and traditional-media reputational attack campaigns against AFBC, amplifying them through anonymous and fake accounts; (ii) fabricating and embellishing repeated media attack narratives; (iii) publishing and stating false and derogatory statements about AFBC; (iv) intimidation tactics directed at AFBC community and civic partners and business vendors such as food truck owners and operators that the defendants knew to be essential to AFBC's taproom success or failure; (v) organizing pressure campaigns against AFBC based upon false and derogatory narratives and statements they disseminated about AFBC; and (vi) knowingly and maliciously tortiously interfering with AFBC's contracts and business expectancies by improper methods, including AFBC vendors, investors, AFBC's relationships with their employees, civic and charitable organization partners, event operators, distributors, brand ambassadors, restaurants and bars that marketed and sold AFBC's beer on their premises, food truck owners and operators and other business relationships in order to destroy AFBC and force the closure of their brewery—a competitor to the brewery and music venue (the Annex)

Andrew Coplon's brother Josh Coplon opened a few blocks away with Thomas Wilder, which also sells beers to military personnel, veterans and their families, marketing beers Wilder crafted at his Virginia Beach brewery, "Young Veterans Brewing Company", a direct AFBC competitor, as more fully described below.

PARTIES

1. Plaintiff AFBC is a corporation that operated a brewery and taproom in Norfolk, Virginia, during the relevant period, and its business formation and development spanned more than five years before Defendants' tortious conduct.
2. Defendant Andrew Michael Coplon is a Virginia resident and the founder and/or operator of Craft Beer Professionals; he materially participated in and/or directed the organized tortious interference campaign directed at AFBC's business, contracts, and business expectancies. Defendant Andrew Coplon leveraged his knowledge of taproom operations and strategic success to inform the strategies underlying the defendants' tortious interference campaign against AFBC and to cloak it in faux credibility. That is, Andrew Coplon understood the importance of taproom sales to profitability and brand exposure; the importance of food trucks to successful taproom operations; the significance of community partnerships to building goodwill and a positive brand in a community; the inherent helplessness industry workers feel when their establishments are attacked or under scrutiny from local governments and media, and angry citizens and influential members of the local food and beverage industry; and the disruption tortious interference like the kind Defendants visited upon AFBC would have on employee morale, customer word-of-mouth discussions; etc. The Craft Beer Professionals website states the following about Andrew Coplon:

3. The Craft Beer Professionals website states that Andrew Coplon, Founder of Secret Hopper and Craft Beer Professionals, markets expertise in profitable taproom operations, including training, metrics, and networking programs emphasizing guest engagement, marketing, financial health, partnerships, and alternative revenue streams; his community comprises more than 16,000 industry professionals, and his Taproom Success programs include staff and manager training, sales growth, financial training, monthly expert Q&As, and peer mastermind groups; neither AFBC nor the prior owner of the taproom space they acquired through a related party, O'Connor Brewery, were customers of Craft Beer Professionals.
4. Defendant Stacie Coplon is a Virginia resident and the wife of Andrew Coplon; she, along with Andrew Coplon, Craft Beer Professionals, and the other

defendants, tortiously interfered with AFBC's business contracts and expectancies.

5. Defendant Robert Grey "Butch" Bracknell is a Virginia resident who materially led and participated in coordinated efforts to target and interfere with AFBC's business relationships and expectancies by improper methods, including AFBC's vendors and food truck operators, as well as other commercial relationships.
6. Defendant Secret Hopper, LLC d/b/a Craft Beer Professionals is a Virginia limited liability company formed on May 8, 2017, with Andrew Coplon listed with the Virginia State Corporation Commission as Founder and Manager. Secret Hopper also does business as Spirits Industry Professionals and Beers to Peers, which Andrew Coplon also manages and controls. Defendants Andrew and Stacie Coplon leveraged Secret Hopper to assist in creating communications and business networks seemingly unrelated to personal business quests, to amplify tortious interference and slander campaigns against AFBC, and to pressure companies like AFBC into paying Craft Beer Professionals for reputational protections. That is, Andrew and Stacie Coplon leveraged Craft Beer Professionals to interfere tortiously with AFBC's business expectancies and contracts, by improper methods and without lawful justification. Secret Hopper is vicariously liable for the tortious conduct of Andrew Coplon alleged herein; a reference herein to Andrew Coplon is a reference to Secret Hopper.
7. Defendant Citizens for a Better Norfolk ("CFABN") is, upon information and belief, a political activist group led by Defendant Zach Roberts and an unknown person claiming to be a VFX Supervisor, that opposed AFBC's operations in Norfolk, damaged its brand, and used online platforms to combine with the other Defendants to harm AFBC's trade, business, fundraising, and commercial operations and tortiously interfere with its business contracts and expectancies.
8. Defendant Zach D. Roberts is a Virginia resident and self-styled freelance photojournalist who, together with the other defendants, has been materially involved in the publication, amplification, coordination, and dissemination of defamatory and commercially harmful content targeting AFBC, tortiously interfering with AFBC's business expectancies via improper methods, and harming its business and brand/reputation.

JURISDICTION AND VENUE

1. Venue is proper in this Court because substantial portions of the complained-of conduct occurred in Norfolk, Virginia, and AFBC suffered injury in

Norfolk. Additionally, the individual defendants reside in Norfolk, Virginia, and Secret Hopper maintains its principal place of business there, and Secret Hopper's registered agent is located within Norfolk, Virginia. As such, venue is proper in the Circuit Court for the City of Norfolk pursuant to Va. Code Ann. § 8.01-262 (1) (2) & (4).

2. This Court has subject-matter jurisdiction pursuant to Section 17.1-513 of the Virginia Code and personal jurisdiction because each Defendant resides in Virginia and committed the tortious acts within Virginia, causing injury within Virginia.

FACTUAL ALLEGATIONS

AFBC Background and Growth

1. In March 2015, Amit Rupani, Jason Bailey, and Alan Beal met in Washington, D.C., to discuss creating a craft beer brand focused on the U.S. Naval Academy in Annapolis, Maryland. Longtime industry professional Alan Beal was hired to develop Seawolf Brewery ("Seawolf"), honoring the U.S. Navy and the U.S. Naval Academy. Seawolf was formed as a Delaware LLC on June 4, 2015, registered in Maryland on July 14, 2015, and began contract brewing in October 2017, launching Special Hops IPA on December 27, 2017 and Cat Shot Lager in April 2018.
2. Seawolf expanded its distribution in November 2018 into Virginia and multiple retail locations; around December 4, 2020, it amended its Delaware charter to change its name to Armed Forces Brewing Company, Inc.
3. By April 2020, AFBC had sold out of beer and paused contract brewing due to COVID, relaunching in Virginia and Maryland on December 4, 2020. On June 12, 2020, former Navy Seal Robert J. O'Neill became a Director and shareholder.
4. AFBC signed a contract with New Realm Brewery in July 2020, launched a Regulation A public stock offering on July 4, 2021, sponsored Navy Football in August 2021, expanded distribution through 2022–2023, including Walmart, Publix, and Winn-Dixie, and launched in Florida on February 21, 2022.
5. On July 20, 2022, AFBC partnered with the John Daly/Major Ed Heart of a Lion Foundation to support it through sales of Preamble – We The People Lager.
6. On September 18, 2022, AFBC's Board authorized a letter of intent to acquire O'Connor Brewing Company; on April 14, 2023, the Board unanimously voted to acquire O'Connor Brewing Company.
7. On April 7, 2023, Ironbound AFBC Properties, LLC contracted to purchase 211 W. 24th Street, Norfolk; AFBC took possession on July 24, 2023.

8. By July 7, 2023, AFBC publicly announced its expansion into the Norfolk brewery and taproom at 211 W. 24th Street, had substantial visibility, relationships, and recognition, and had approximately 7,874 shareholders, which increased to 10,875 by December 31, 2024; Defendants' tortious interference campaign coincided with AFBC's planned investor recruitment period.
9. On July 7, 2023, Governor Youngkin and the Virginia Economic Development Partnership announced AFBC's move to Virginia, joined by Delegate Jackie Glass's welcome. Four days later, Defendants had defamed AFBC so convincingly that Delegate Glass was holding a town hall meeting to organize opposition to AFBC rather than welcoming the new business to Norfolk.
10. AFBC soft-opened its Norfolk taproom on January 12, 2024, opened to the public on January 13, 2024, and held its grand opening on January 26–27, 2024.
11. Around March 6, 2025, AFBC's Norfolk taproom and brewing operations ceased as a proximate cause of the combined tortious acts and interference of the defendants.

Opposition Campaign: Overview and Accounts

1. The July 7, 2023 AFBC public announcements triggered outrage and immediate tortious interference via improper methods from the defendants, and Andrew Coplon led the initial charge through Craft Beer Professionals, urging citizens to make complaints against AFBC to Norfolk governmental officials using an online form they crafted, resulting in about 800 complaints, many from anonymous accounts, expressing false concerns about AFBC. Notably, Andrew Coplon's brother, Josh Coplon, and Thomas Wilder were planning to open a competing brewery and venue (The Annex) near AFBC's brewery, which they opened in 2024 about 5 blocks from AFBC, with a capacity similar to AFBC's taproom, both capable of accommodating more than 400 guests. The Annex also competes for the military market, serving beer from Thomas Wilder's Virginia Beach "Young Veterans Brewing Company," which also markets itself as honoring and celebrating the United States Armed Forces. Notably, Wilder spoke against AFBC's permit request and is quoted in a December 4, 2023, Virginia Mercury article titled "A military-themed brewery sparks a fight in a Virginia military city", arguing against AFBC's permit request.
2. During AFBC CEO Alan Beal's August 7, 2023 address to the Park Place Civic League Zoning Improvement Subcommittee, a committee member apologized to him for the coordinated slander effort against AFBC by certain people in Norfolk.

3. The Reddit profile TECL_grimsdottir was created on October 22, 2023, and was used to defame AFBC and to organize and mobilize people to file complaints against AFBC with the Norfolk Planning Commission and Norfolk City Council; in January 2024, its operator created a CFABN X (Twitter) account.
4. Throughout 2024, CFABN and Defendants amplified false statements that AFBC owed "thousands of dollars" to a clothing manufacturer who was "now suing," and that merchandise sales revenue would go to AFBC's CEO's pocket; AFBC confirmed with the vendor that there was no dispute or lawsuit.
5. Defendants created and published a fabricated bankruptcy image naming AFBC as the debtor using a mismatched case number; AFBC has never filed for bankruptcy.
6. On November 1, 2023, AFBC donated \$4,000 to the Armed Services YMCA of Hampton Roads ("ASYMCAHR") for hams and turkeys for 200 Holiday Food Bags for active-duty military families experiencing food insecurity, with two public food drive events scheduled at Norfolk Admirals games. After Andrew Coplon emailed ASYMCAHR leadership on November 13, 2023, defaming AFBC and urging withdrawal from the holiday food drive partnership, ASYMCAHR canceled the partnership and returned the donation on November 17, 2023.
7. On November 16, 2023, the Norfolk Planning Commission staff recommended approval of an AFBC permit application, but the Commission voted 4–2 against supporting AFBC's permit; Andrew Coplon and Robert Bracknell spoke in opposition, defaming AFBC.
8. Around November 30, 2023, Mr. Coplon publicly organized opposition to AFBC's City Council permit hearing, directing opponents to email Council and attend; on December 12, 2023, Council approved AFBC's CUP 6–1, with Coplon and Bracknell speaking against AFBC.
9. On the afternoon of December 20, 2023, AFBC posted an explanation on Facebook about what happened with the nine families who came by the brewery to pick up food and about Andrew Coplon's sabotage of AFBC's partnership with ASYMCAHR; soon thereafter, Stacie Coplon called ASYMCAHR director Laura Baxter, telling her to tell AFBC to take the post down, claiming the Coplons were receiving death threats. Ms. Baxter then called AFBC and demanded that they take down the Facebook post, even though it was truthful and informative for the community, showing how effective Stacie Coplon was at intimidating Ms. Baxter, and gaslighting her into thinking the innocuous and informative post somehow endangered the Coplons—the people who initially attacked AFBC with lies, as explained throughout this Complaint..

10. On January 15, 2024, Mr. Bracknell contacted the Hampton Roads Food Truck Association, defaming AFBC, after which AFBC experienced recurring food truck vendor withdrawals and disruptions.
11. On February 14, 2024, Mr. Bracknell also appeared on Mr. Coplon's Craft Beer Professionals podcast.
12. AFBC's Norfolk taproom closed on or about March 6, 2025, during the period when AFBC was raising approximately \$5,000,000 in capital.
13. AFBC's annual lease obligations exceeded \$540,000; it invested approximately \$650,000 in the Norfolk acquisition structure and property entity. In 2024, AFBC's Norfolk taproom sales were approximately \$172,499.05, far below expectations, due to the damages proximately caused by the defendants' tortious conduct, and the taproom closed in March 2025.
14. Defendants' tortious conduct proximately caused AFBC to suffer widespread commercial harm, including cancellations, withdrawals from charitable partnership agreements, suppressed attendance at events, disrupted vendor participation, the loss of AFBC's longest-standing draft beer placement, and similar reputational damage, as explained below.

Specific Tortious Interference Acts By Defendant

Andrew Michael Coplon

1. On July 7, 2023, Mr. Coplon commented on Virginia Craft Beer Magazine's Facebook "welcome to AFBC" post, stating, "I don't know how I feel about this," implying AFBC fosters a culture of hate and hostility towards the LGBTQ community, thereby undermining AFBC's community goodwill.
2. On July 8, 2023, the websites www.armedforcesbrewingc.com and www.ownarmedforcesbrewingc.com went live and were linked to The Trevor Project; upon information and belief, Mr. Coplon directed these efforts to create sham LGBTQ crisis websites using fake websites with names similar to AFBC's name, which might appear in online searches.
3. On July 10, 2023, Mr. Coplon launched an online form through Craft Beer Professionals, soliciting complaints to the Norfolk City Council to pressure the denial of AFBC permits based on false claims that AFBC was bigoted and intolerant of LGBTQ persons, gathering nearly 800 expressions of concern (many from anonymous accounts)—targeting AFBC's municipal permitting process for CUP/operations.
4. On July 12, 2023, Mr. Coplon provided false statements to WAVY News criticizing and defaming AFBC as fostering a "culture of hate," particularly towards the LGBTQ community, including: "Norfolk and the craft beer industry

as a whole do not have room for those who fight against inclusion and anti-diversity," and "We don't have room for a culture of hate like this," targeting AFBC's public relations and business expectancies with customers, community partners and vendors.

5. On November 13, 2023, Mr. Coplon emailed executive leadership of ASYMCAHR, defaming AFBC and asserting AFBC did not share the ASYMCAHR's values and urging reconsideration of AFBC as a community partner amid organized contemporaneous calls/emails disparaging AFBC, leading ASYMCAHR to return AFBC's \$4,000 donation and terminate the partnership on November 17, 2023—targeting AFBC's ASYMCAHR partnership and related Norfolk Admirals food-drive events.
6. On November 16, 2023, Mr. Coplon, along with Mr. Bracknell and Tom Wilder, spoke against AFBC at the Norfolk Planning Commission, falsely accusing AFBC's CEO of stolen valor; after these statements, the Commission voted 4–2 against supporting AFBC's permit, targeting municipal permitting and CUP approval.
7. Around November 30, 2023, Mr. Coplon publicly organized and encouraged opposition to AFBC's upcoming Norfolk City Council permit hearing, directing citizens to email the Council, attend, and disparage AFBC, targeting its City Council CUP/operational approvals.
8. In January–February 2024, Mr. Coplon (via Craft Beer Professionals) hosted/featured communications amplifying opposition to AFBC on the false premises that AFBC was racist, bigoted, and intolerant of the LGBTQ community.
9. Mr. Coplon falsely disparaged AFBC to the Coastal Virginia Brewers Alliance (CVBA), persuading it to deny AFBC's membership application; in early February 2024, CVBA President Tommy Adkins emailed AFBC's Head Brewer, Dale Lazar, that the CVBA did not approve AFBC's application. As a result, Mr. Lazar could no longer teach classes for the ODU/Richmond University Craft Brewers Program, which demoralized him and precluded recruitment opportunities for new brewers, and promote AFBC's beers and brand there.
10. On March 17, 2024, Mr. Coplon sought a bogus emergency protective order against AFBC's Chief Marketing Officer, Michael-Paul Levinson, as a sham lawfare tactic that required AFBC to defend against, which was denied, targeting a key AFBC executive and tortiously interfering with AFBC's relationships with key employees via improper methods.
11. Defendants often met at Afterglow Brewing, a few blocks from the AFBC taproom, to strategize and discuss "what they were going to do to AFBC" next, according to Afterglow owner Josh Evans. On July 26, 2024, Mr. Evans told

AFBC CEO Alan Beal and AFBC managers Nicole Couch, Dale Lazar, John Newell, and Martha Newell that Defendants Andrew Coplon, Butch Bracknell, and Zach Roberts were meeting at his taproom to discuss their next actions against AFBC. When Mr. Evans asked Mr. Roberts what they were up to, he replied, "Saving Norfolk".

12. On September 5, 2024, after initially inviting AFBC personnel to purchase Virginia Brewers Conference tickets, Mr. Coplon instructed that those ticket holders could not attend and refunded the tickets, thereby targeting conference participation and industry networking by AFBC employees, curtailing AFBC's local networking access, and engendering confusion and low morale among AFBC employees.
13. As a proximate cause of Mr. Coplon's tortious interference by improper methods—sham protective order filings, sharp and deceitful dealings with AFBC employees, disparagement of AFBC's culture and tolerance for alternative lifestyle people, AFBC suffered substantial damages, as will be proved at trial.
14. In 2023–2024, Mr. Coplon participated in and/or directed coordinated outreach targeting AFBC's business vendors, events, and charitable relationships, proximately causing cancellations, withdrawals, suppressed attendance, lost sales, and damage to commercial relationships based upon false premises that AFBC fostered a culture of hate and was hostile to the LGBTQ community—targeting vendor/food-truck relationships, charitable partners, on-premise draft placements, events, and general brand reputation.

Robert Grey "Butch" Bracknell

1. On November 16, 2023, Mr. Bracknell spoke against and disparaged AFBC at the Norfolk Planning Commission hearing, accusing AFBC's CEO of being guilty of stolen valor claims, and AFBC of fostering a culture of hate and being hostile to the LGBTQ community, resulting in a 4–2 vote against supporting AFBC's permit, targeting municipal permitting and CUP.
2. On December 12, 2023, Mr. Bracknell spoke in opposition at or around the Norfolk City Council CUP proceedings, slandering AFBC as fostering a culture of hate and being hostile to the local LGBTQ community; the Council approved 6–1, with the lone dissenter being the councilperson for the area of the AFBC brewery and taproom, targeting AFBC's municipal permitting and CUP requests.
3. On January 15, 2024, Mr. Bracknell contacted the Hampton Roads Food Truck Association (emails to Angela Kirby and Necie Templeton), disparaging and defaming AFBC and accusing it of fostering a culture of hate and hostility to the LGBTQ community and repeating the other defamatory lies against

AFBC. As a proximate cause thereof, many food trucks withdrew from selling food at AFBC's taproom, and participation disruptions recurred; he knowingly and intentionally targeted food-truck/vendor relationships he knew were critical to AFBC's taproom operations.

4. During Summer 2024, Mr. Bracknell harassed Pelican Pete's food-truck owner about doing business with AFBC, again promoting the false premise that AFBC fostered a culture of hate and was hostile to the LGBTQ community; this harassment stopped after Pelican Pete's ownership sent a letter to Mr. Bracknell's law firm, Crenshaw, Ware & Martin, but the overall harm had already been done.
5. On July 26, 2024, Afterglow owner Josh Evans informed AFBC that Mr. Bracknell, Mr. Coplon, and Mr. Roberts had been meeting at his taproom to coordinate tortious actions against AFBC.
6. On October 2, 2024, Mr. Bracknell filed a false complaint with the United States Marine Corps Inspector General, attempting to sabotage AFBC's partnership agreement with the United States Marine Corps Toys for Tots program—targeting AFBC's business relationship with a widely recognized holiday program, intended to foster goodwill in the community.
7. On October 24–25, 2024, after Raymarie Rowzie of the Republican Party of Norfolk booked an outdoor beer garden event at AFBC and hired the nearby (one block away) Fish N Pig restaurant to cater it, Mr. Bracknell (with CFABN and others) defamed and disparaged AFBC to Fish N Pig, proximately causing them to terminate the catering contract. Thereafter, CFABN boasted online that it had sabotaged the event by convincing Fish N Pig to cancel the catering contract.
8. On October 25, 2024, Mr. Bracknell (with CFABN) defamed, disparaged and harassed AFBC after AFBC and its "Feed The Front Line" partners delivered over 1,200 Mission BBQ lunch boxes to Norfolk Police Department personnel, Norfolk Sheriff's Department personnel, Norfolk Fire Department personnel, and to homeless citizens at a Salvation Army parking lot. AFBC's generosity prompted the Norfolk Police Department and Sheriff's Department to post "Thank You" messages to AFBC on Facebook and X. However, their posts were taken down seven minutes after being posted as a proximate cause of the Defendant's harassment, harming AFBC's efforts to cultivate community goodwill with local public-safety agencies.
9. On November 16, 2024, Mr. Bracknell (with TECL_grimsdottir/CFABN) complained to the Norfolk Police about an AFBC concealed-carry class being held at the brewery, falsely alleging a lack of a business license and that guns were unlawfully on the property; both claims were false.

10. On December 12, 2024, Mr. Bracknell messaged/harassed Grace O'Malley's owner Christy Marron and General Manager Robert Wallace on Facebook, disparaging AFBC and complaining about their displaying AFBC draft beer for sale on tap; immediately thereafter, they pulled AFBC beers from their taps, ending a longstanding business account that had sold AFBC beers on tap since 2018—the targeting an important AFBC on-premises draft placement and their business relationship with Grace O'Malley's, and business expectancy in continued draft beer sales there.

Zach D Roberts

1. On September 11, 2023, Mr. Roberts attended a Park Place Civic League meeting and falsely accused AFBC's CEO Alan Beal of being a January 6th insurrectionist, referencing an unrelated photo of a person with three Mike's Hard Lemonade cans in a pocket vest at a Trump rally. As a proximate cause of these false accusations, the Civic League voted not to support AFBC's CUP application, targeting AFBC's standing and reputation with a neighborhood association and its support for AFBC's municipal permitting.
2. On July 26, 2024, AFBC learned that Mr. Roberts had been plotting with Mr. Coplon and Mr. Bracknell at Afterglow Brewing to commit tortious attacks against AFBC.
3. On December 9, 2024, Mr. Roberts (with CFABN reposting) posted content referencing Luigi Mangione and "taking out a CEO," posting on X and Blue Sky (and CFABN reposting): "Other than taking out a CEO, his wide-ranging jacket collection is our only other similarity"; commenters on Facebook and Instagram were blocked after commenting that AFBC CEO Alan Beal should be "Luigi'd"—a death threat—targeting AFBC's leadership team.

Citizens For A Better Norfolk (CFABN) and TECL_grimsdottir

1. On October 22, 2023, the Reddit profile TECL_grimsdottir (primary CFABN operator) was created and used to drive disparaging messaging about AFBC to the Norfolk City Council, targeting the municipal permitting/CUP process and AFBC's business reputation in the community.
2. On November 14, 2023, TECL_grimsdottir/CFABN posted and amplified a false video alleging that AFBC's CEO had committed a "stolen valor" felony; the accusation was echoed at the November 16 Planning Commission hearing—targeting AFBC's business reputation and that of its CEO, affecting permitting and community partnerships and AFBC's business reputation in the community.
3. In November 2023–2024, CFABN operated as a coordinated hub, using anonymous/pseudonymous accounts to pressure AFBC's

partners/vendors/customers, publishing disparaging messages that falsely implied that partners who remained silent "support it as well"—targeting AFBC's vendor partnerships, charitable relationships, on-premise beer accounts, and business reputation in the community.

4. In early 2024, CFABN engaged in the doxing of a retired Admiral associated with an AFBC event, as reported by an event coordinator, leading to additional backlash targeting AFBC event participation and bookings, brand ambassador relationships, and supporters.
5. On March 9, 2024, CFABN posted a fake AI-generated video with an AI voice of AFBC's CEO Alan Beal, Gretchen Smith, and Robert O'Neil, encouraging people in Norfolk (using Beal's AI voice) to complain to the Norfolk Tides baseball team and protest its sponsorship affiliation with AFBC—targeting AFBC's community sports-related partnerships, business reputation, and goodwill in the community.
6. On March 14, 2024, CFABN posted a fake AI-generated video falsely stating (using an AI-generated voice of Alan Beal) that AFBC stole a program from Legacy of Honor to maintain military graves, targeting AFBC's charitable partnerships, goodwill, and business reputation in the community.
7. In January 2024, the TECL_grimsdottir operator created a CFABN X (Twitter) account to amplify opposition affecting AFBC's business relationships and agreements with community vendors and partners, and damage AFBC's business reputation and goodwill in the community.
8. On October 4, 2025, CFABN created and published a fabricated U.S. Bankruptcy Court image listing AFBC as the debtor and assigning a mismatched case number, falsely implying that AFBC had filed for bankruptcy— further targeting and damaging AFBC's business relationships and expectancies with investors, vendors, partners, and customers, and its business reputation. Notably, although AFBC had closed the Norfolk brewery before October 4, 2025, it was still selling contract-brewed beers and merchandise, the sales of which they knew relied heavily upon goodwill.
9. On December 5, 2024, CFABN posted social media content insinuating boycotts/closures of businesses carrying AFBC beer, citing AFBC draft beer at Grace O'Malley's—targeting on-premise draft placements and business relationships with bars and restaurants.
10. In November–December 2025, CFABN posted false statements that AFBC owed "thousands of dollars" to its clothing manufacturer (and was being sued) and that revenue from merchandise sales would go to the CEO's pocket, targeting online store merchandise revenues, vendor relationships, and investor/customer confidence.

COUNT I - Tortious Interference with Contracts and Business Expectancies (All Defendants)

1. Plaintiff incorporates Paragraphs 1 through 74 as if fully set forth herein.
2. During all times relevant, AFBC possessed existing contractual relationships and/or valid business expectations with vendors, distributors, sponsors, charitable organizations, food-truck vendors, customers, investors, event operators, restaurants and bars (off-premises accounts), and community partners.
3. Defendants knew of these relationships and expectancies and intentionally interfered with them through improper methods, including publishing false statements of fact about AFBC; disparaging AFBC without a basis in fact, posting fabricated bankruptcy imagery implying AFBC filed bankruptcy, publishing manipulated media disparaging and falsely defaming AFBC; directing intimidation campaigns against AFBC vendors, charitable organization partners, AFBC employees; coordinated pressure campaigns; targeted outreach to third parties;; organized media and social media amplification of disparaging content against AFBC's business interests and business expectancies, and threatened public backlash against any company or organization doing business with AFBC or affiliating with AFBC in any way whatsoever, as alleged.
4. Defendants' conduct caused cancellations, withdrawals, impaired fundraising, suppressed event attendance, lost beer and merchandise sales, impaired vendor participation, and damage to AFBC's commercial relationships, including food-truck participation disruption, YMCA partnership cancellation, and discouragement of longstanding on-premise draft placements.
5. To the extent any expectancy was terminable at will, Defendants' interference was effected by improper methods, including misrepresentation, defamation, deceit, sharp dealing, and overreaching, among others.
6. Defendants' interference was intentional, without lawful justification, and targeted towards AFBC's property rights in contract performance and associated profits and benefits, including continuing and renewal revenue streams from beer sales and merchandise, and other business expectancies.
7. AFBC suffered substantial damages as a direct and proximate result of Defendants' intentional interference, in an amount to be proven at trial, not less than \$15,000,000 and up to \$50,000,000 (after trebling by operation of the statutory conspiracy statute), exclusive of punitive damages, attorney fees, and costs.

8. Plaintiff seeks \$350,000 in punitive damages per Defendant to punish them and deter such future conduct by them and others.

COUNT II - Statutory Business Conspiracy (Va. Code §§ 18.2-499, -500)

1. Plaintiff incorporates Paragraphs 1 through 82 as if fully set forth herein.
2. Virginia Code § 18.2-499 prohibits any two or more persons from combining, associating, agreeing, mutually undertaking, or concerting together for willfully and maliciously injuring another in their reputation, trade, business, or profession, without lawful justification; under § 18.2-499(B), any person who attempts to procure the participation, cooperation, agreement, or other assistance of any one or more persons to enter into such a prohibited combination is likewise in violation and subject to the same penalties.
3. Under Virginia Code § 18.2-500(A), any person injured in reputation, trade, business, or profession by reason of a violation of § 18.2-499 may recover threefold the damages sustained and the costs of suit, including a reasonable fee to Plaintiff's counsel, and may seek injunctive relief.
4. Defendants combined, associated, agreed, and acted in concert to willfully and maliciously injure AFBC in its reputation, trade, business, profession, fundraising activities, and commercial operations.
5. AFBC will adduce direct evidence at trial showing Defendants Coplon, Bracknell, and Roberts regularly met at the Afterglow Brewery taproom to conspire, strategize, and coordinate their efforts to interfere tortiously with Plaintiff's contracts and business expectancies, and damage AFBC's business and reputation, as alleged.
6. Defendants each had an independent stake in the object of the conspiracy.
7. In furtherance of the conspiracy, Defendants combined to commit unlawful, tortious acts, interfering tortiously by improper methods with AFBC's contracts and business expectancies, including organized defamation and disparagement campaigns, publication of fabricated bankruptcy materials, publication of manipulated media, anonymous harassment, intimidation, overreaching, sharp dealing, and launching deceitful and coordinated pressure campaigns.
8. AFBC suffered substantial damages and is entitled to treble damages, attorneys' fees, costs, and injunctive relief pursuant to Va. Code § 18.2-500; Defendants used tortious interference with AFBC's contracts and business expectancies as predicate unlawful acts for statutory business conspiracy liability.

9. The conspirators acted with legal malice—intentionally, purposefully, and without lawful justification—at all relevant times.

DAMAGES

1. Plaintiff's damages presently exceed Fifteen Million Dollars (\$15,000,000), exclusive of treble damages, punitive damages, attorneys' fees, costs, and additional consequential damages to be proved at trial; they include:

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that the Court enter judgment in its favor and against Defendants, jointly and severally, and award:

- a) Compensatory damages in the amount of \$50,000,000;
- b) Treble damages pursuant to Va. Code § 18.2-500 on the statutory business conspiracy claim;
- c) Punitive damages of \$350,000 per Defendant on Count 1;
- d) Plaintiff's reasonable attorneys' fees and costs as allowed by Va. Code § 18.2-500 and otherwise permitted;
- e) Temporary and permanent injunctive relief requiring preservation and removal of fabricated and defamatory content and prohibiting further dissemination thereof; and
- f) Such other and further relief as the Court deems just and proper.

JURY DEMAND

Plaintiff demands trial by jury on all issues so triable.

DATED: May 18, 2026

ARMED FORCES BREWING COMPANY, INC.

By Counsel

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