

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

**Cameron Johnson; Luke Thomas; and
Trace Stevens,**

Plaintiffs,

v.

A. Scott Fleming, in his official capacity as the Director of the State Council of Higher Education for Virginia; **John Jumper**, in his official capacity as the Chair of the State Council of Higher Education for Virginia; **Major General James W. Ring**, in his official capacity as The Adjutant General of Virginia; and **Donald L. Unmussig**, in his official capacity as the Chief Financial Officer of the Virginia Department of Military Affairs,

Defendants.

Case No. 3:25-cv-00407-RCY

Plaintiffs' Motion for Preliminary Injunction

Plaintiffs Cameron Johnson, Luke Thomas, and Trace Stevens move this Court under Federal Rule of Civil Procedure 65 for a preliminary injunction:

- (1) Prohibiting Defendants Fleming and Jumper (and through them, the State Council of Higher Education for Virginia) from denying Virginia Tuition Assistance Grants to Cameron Johnson and Luke Thomas—including for the upcoming fall 2025 and spring 2026 semesters, and for all future semesters—because they selected programs the State Council deems to be for “religious training or theological education.”
- (2) Prohibiting Defendants Ring and Unmussig (and through them, the Virginia Department of Military Affairs) from denying Trace Stevens a National Guard Tuition Assistance Reimbursement Grant for the current summer 2025 semester because he selected a major the Department deems to be for “religious training or theological education.”
- (3) Ordering Defendants Ring and Unmussig (and through them, the Virginia Department of Military Affairs) to send Trace Stevens the reimbursement grant in the amount of \$2,009.99 for the spring 2025 semester that he otherwise would soon be receiving but for the National Guard’s religious exclusion.

- (4) Prohibiting Defendants Ring and Unmussig (and through them, the Virginia Department of Military Affairs) from denying Trace Stevens National Guard Tuition Assistance Reimbursement Grants while Trace is in a Master of Divinity program at Liberty University.

This Motion is supported by the attached Brief in Support, Exhibits, the Declarations of Cameron Johnson, Luke Thomas, and Trace Stevens, the Verified Complaint (Doc. 1), and the Exhibits to the Verified Complaint (Docs. 1-1 – 1-9). Plaintiffs request this relief without bond.

Dated June 27, 2025.

Respectfully submitted,

s/ Jacob E. Reed

Jacob E. Reed
VA Bar No. 97181
ALLIANCE DEFENDING FREEDOM
44180 Riverside Parkway
Lansdowne, VA 20176
Telephone: (571) 707-4655
jreed@ADFLegal.org

Ryan J. Tucker*
AZ Bar No. 034382
Jeremiah J. Galus*
AZ Bar No. 030469
ALLIANCE DEFENDING FREEDOM
15100 N. 90th Street
Scottsdale, AZ 85260
Telephone: (480) 444-0020
rtucker@ADFLegal.org
jgalus@ADFLegal.org

David A. Cortman*
GA Bar. No. 188810
ALLIANCE DEFENDING FREEDOM
1000 Hurricane Shoals Road, NE
Suite D-1100
Lawrenceville, GA 30043
Telephone: (770) 339-0774
dcortman@ADFLegal.org

Attorneys for Plaintiffs / * *Admitted Pro hac vice*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was filed on June 27, 2025, using the Court's CM/ECF system.

s/ Jacob E. Reed

Jacob E. Reed

Counsel for Plaintiffs