VIRGINIA:

IN THE CIRCUIT COURT FOR THE CITY OF WINCHESTER

MARK STICKLEY, et al.,

Plaintiffs,

v. **Case No. CL21-206**

THE CITY OF WINCHESTER, et al.,

Defendants.

PLAINTIFFS' REPLY TO DEFENDANTS' MEMORANDUM IN OPPOSITION TO MOTION FOR TEMPORARY INJUNCTION

I. POWER TO GRANT INJUNCTIVE RELIEF

A. Defendants Fail to Challenge that Plaintiffs Are Likely to Suffer Irreparable Harm.

Much of the Defendant's response focuses on contesting whether this Court has the power to grant relief, because Plaintiffs have not alleged legal harm sufficient to warrant injunctive relief, rather than addressing the underlying constitutional infringements that mandate relief. Defendants argue that the mere threat of prosecution is insufficient to create harm for purposes of standing analysis. They cite two U.S. Supreme Court cases to support this conclusion: *Beal v. Mo. Pac. R.R. Corp.*, 312 U.S. 45 (1941), and *Steffel v. Thompson*, 415 U.S. 452 (1974). *See* Defendant's Opposition at l. Defendants misread both cases.

Beal involved a railroad company which invoked diversity jurisdiction in an effort to avoid fines associated with criminal violations, rather than any constitutional claim. *Beal*, 312 U.S. at 46–48. The *Beal* Court stated that the imminent threat of unauthorized prosecution was insufficient for a federal court to issue injunctive relief, but the decision was grounded in principles of Federalism:

> The federal courts are without jurisdiction to try alleged criminal violations of state statutes. The state courts are the final arbiters of their meaning and appropriate application, subject only to review by this Court if such construction or application is appropriately challenged on constitutional grounds. Hence interference with the processes of the criminal law in state courts, in whose control they are lodged by the Constitution, and the determination of questions of criminal liability under state law by federal courts of equity, can be justified only in most exceptional circumstances, and upon clear showing that an injunction is necessary in order to prevent irreparable injury.

Id. at 49–50 (citations omitted). The *Beal* Court explained that "[n]o question is here presented of the constitutional validity of the statute," in justifying why otherwise interfering in a purely state matter through the granting of injunctive relief was inappropriate. *Id.* at 51. Thus, *Beal* does not bear on whether a *state* court has the power to enjoin a *state* law that unconstitutionally infringes on protected activity with the threat of criminal prosecution.

Likewise, in *Steffel v. Thompson*, the Court was again concerned with Federalism and federal intervention into state matters. They stated that:

> [W]hile a pending state prosecution provides the federal plaintiff with a concrete opportunity to vindicate his constitutional rights, a refusal on the part of the federal courts to intervene when no state proceeding is pending may place the hapless plaintiff between the Scylla of intentionally flouting state law and the Charybdis of forgoing what he believes to be constitutionally protected activity in order to avoid becoming enmeshed in a criminal proceeding.

Steffel, 415 U.S. at 462.

While Defendants are correct in stating that the *Steffel* Court in footnote 12 states: "We note that, in those cases where injunctive relief has been sought to restrain an imminent, but not yet pending, prosecution *for past conduct*, sufficient injury has not been found to warrant injunctive relief." *Id.* at 463 n.12. However, Defendants omit the next statement made by the Court: "There is some question, however, whether a showing of irreparable injury might be made in a case where, although no prosecution is pending or impending, an individual demonstrates that he will be required to *forgo* constitutionally protected activity in order to avoid arrest." *Id.*

This important question, which went unmentioned by the Defendants and unresolved by the 1974 *Steffel* Court, appears to have been resolved in a 2014 U.S. Supreme Court case cited in Plaintiffs' original Memorandum in Support of Motion for Temporary Injunction, which stated:

> [A]n actual arrest, prosecution, or other enforcement action is not a prerequisite to challenging the law. *See Steffel v. Thompson*, 415 U.S. 452, 459, 94 S. Ct. 1209, 39 L. Ed. 2d 505 (1974) ("[I]t is not necessary that petitioner first expose himself to actual arrest or prosecution to be entitled to challenge a statute that he claims deters the exercise of his constitutional rights"); *see also MedImmune, Inc. v. Genentech, Inc.*, 549 U.S. 118, 128–29, 127 S. Ct. 764, 166 L. Ed. 2d 604 (2007) ("[W]here threatened action by *government* is concerned, we do not require a plaintiff to expose himself to liability before bringing suit to challenge the basis for the threat"). Instead, we have permitted pre-enforcement review under circumstances that render the threatened enforcement sufficiently imminent. Specifically, we have held that a plaintiff satisfies the injury-in-fact requirement where he alleges "an intention to engage in a course of conduct arguably affected with a constitutional interest, but proscribed by a statute, and there exists a credible threat of prosecution thereunder." *Babbitt v. Farm Workers*, 442 U.S. 289, 298, 99 S. Ct. 2301, 60 L. Ed. 2d 895 (1979).

Susan B. Anthony List v. Driehaus, 573 U.S. 149, 158–59 (2014).

Likewise, the Court of Appeals of Virginia explained that for purposes of standing analysis:

> Although the injury alleged must be concrete and particularized, it "'need not be large[;] an identifiable trifle will suffice.'" Further, "the Supreme Court has consistently recognized that threatened rather than actual injury can satisfy Article III standing requirements. 'One does not have to await the consummation of threatened injury to obtain preventive relief. If the injury is certainly impending that is enough.'"

Chesapeake Bay Found., Inc. v. Commonwealth ex rel. State Water Control Bd., 48 Va. App. 35, 47 (2006) (citation omitted).

Threatened injury is exactly the unenviable situation that Plaintiffs currently face.[1] In order to avoid the threat of prosecution, they are facing the choice of sacrificing the exercise of

[1] Plaintiffs' harm is compounded by the length of this case's procedural history, which has progressed at a ponderous pace. After receiving the Complaint, Defendants first requested additional time to file responsive pleadings, to which consent was given by Plaintiffs. When responsive pleadings were filed in mid-May, they were accompanied with a Defense Motion to Dismiss and Demurrer. Resisting Plaintiffs' attempts to rapidly set a date for a hearing on their application for Temporary Injunction due to unavailability of Defense counsel, the latest of the

constitutionally enumerated rights. Unlike the possible future protests, the "existence or nature of" which was "speculative" in *Virginia Student Power Network v. City of Richmond*, 105 Va. Cir. 259, 261 (Richmond 2020), here the threat to Plaintiffs is not speculative. There are scheduled, permitted events coming to Winchester, at which Plaintiffs are restrained from carrying firearms. *See* Stickley Aff. ¶¶ 1, 4, 7. Plaintiffs have averred that they wish to carry in parks and community centers, where they are now restrained from doing so. *See* Compl. ¶¶ 39, 41, 43; Wilkerson Aff. ¶ 7. Indeed, when Plaintiffs demonstrate that they are being restrained from exercising constitutional rights, harm sufficient for injunctive relief has been established.

Contrary to Defendant's claims, Virginia courts have made this clear in explaining that even a "temporary violation of a constitutional right itself is enough to establish irreparable harm." *Lynchburg Range & Training, L.L.C. v. Northam*, 105 Va. Cir. 159, 164 (Lynchburg 2020) (citing *Elrod v. Burns*, 427 U.S. 347, 373 (1976)). *See also Dillon v. Northam*, 105 Va. Cir. 402, 414 (Norfolk 2020) ("The Court acknowledges that Plaintiffs could satisfy the irreparable-injury prong by demonstrating that the failure to grant a temporary injunction would lead to a violation of their constitutional rights.").

Court's proffered dates was selected, September 27, 2021. At the September 27, 2021 scheduling date, docketed by Plaintiffs to proceed in obtaining Temporary Injunctive relief, Defendants instead, for the first time, urged that a hearing on Defendants' Demurrer was procedurally necessary before the Court could decide Plaintiffs' request for Injunction. Following a late October 2021 hearing on the Defense Demurrer and Motion to Dismiss, the Court issued an early-November decision granting in part Defendants' Demurrer (granted with respect to Plaintiffs' request for Mandamus, granted as to allegations of unreasonable search and seizure, and granted as to Plaintiffs with only representational standing), but otherwise dismissing the Defendants' Demurrer. Following this decision, Plaintiffs again pursued a date for hearing on their request for Temporary Injunction. In December of 2021, the Court proposed available dates in late February of 2022, which the Defense, now with new counsel, also rejected due to a scheduling conflict. Defense counsel finally obtained a clear spot in their schedule, and agreed to a May 6, 2022 date, which was subsequently docketed. This date was then, finally, delayed one more time, to May 25, 2022, over the objection of Plaintiffs, due to Defense scheduling conflicts.

B. A Grant of Authority from the General Assembly Cannot Save an Unconstitutional Law.

Defendants have repetitively characterized the instant action as a "facial" challenge. Defs.' Mem. Opp'n to Pls.' Mot. Temporary Inj. at 5, 10. However, Plaintiffs allege both an as applied and facial challenge. It is worth noting that Plaintiffs challenge only *portions* of the Ordinance and underlying state law by showing how they affect the self-defense rights of named Plaintiffs. Plaintiffs challenge the provisions of Winchester City Code §§ 16-34(a)(2), 16-34(a)(3), and 16-34(a)(4), and the corresponding portions of Virginia Code § 15.2-915(E). *See* Compl. ¶ 1.

Plaintiffs present a challenge to a statute and ordinance that authorize infringement of previously recognized constitutional rights. In fact, some of the restricted areas challenged here ("public street or park") are the very same areas described by the Virginia Supreme Court in *DiGiacinto* as non-sensitive areas where restriction would be presumptively unconstitutional under Article I, § 13. *DiGiacinto v. Rector & Visitors of George Mason Univ.*, 281 Va. 127, 136 (2011). This fact underscores the unconstitutionality of the Ordinance and underlying statute.

The Defendants alleges that any action taken by a locality is *de facto* constitutional, provided it was accomplished pursuant to express authority of the General Assembly. To support this theory, Defendants cite *Bragg Hill Corp. v. City of Fredericksburg*, 297 Va. 566 (2019). But that is not what *Bragg Hill* says. *Bragg Hill* simply reaffirms the well-recognized Dillon's Rule of strict construction by explaining that a "municipal ordinance is invalid under Dillon's Rule if it exceeds the scope of authority granted by statute, or is inconsistent with a statute such that the ordinance and statute cannot coexist." *Id.* at 578. Here, Plaintiffs do not contest the fact that the General Assembly authorized some form of local Ordinance. However, simply because the General Assembly authorized an ordinance, the ordinance is not

automatically and conclusively constitutional. This Ordinance, as explained below, suffers from multiple constitutional deficiencies.

C. This Court Has the Power to Provide Injunctive Relief.

Contrary to Defendants' urgings, this Court has the authority and in fact the duty to enjoin unconstitutional laws. Defendants point to *Daniels v. Mobley*, 285 Va. 402 (2013), to support an argument that equitable and injunctive relief is not available to restrain the sovereign from acting in the criminal context. *See* Defs.' Mem. Opp'n to Pls.' Mot. Temporary Inj. at 4. The *Daniels* Court reasoned that it is inappropriate for courts to issue advisory opinions, and injunctive relief is best suited to adjudicate rights rather than a dispute of facts which may lead to criminal consequences. *Id.* at 408–09. However, while the *Daniels* Court explained that equitable relief is generally unavailable to enjoin enforcement of criminal statutes, such judicial restraint does not apply to complaints involving self-executing constitutional issues. *Id.* at 411–12. The *Daniels* Court then went on to explain that when the underlying challenge is based not on facts in dispute, but "a challenge to the constitutionality of a statute based upon United States law or self-executing provisions of the Virginia Constitution; such a request for declaratory judgment presents a justiciable controversy." *Id.* at 412 (citing *DiGiacinto*, 281 Va. at 137).

The Fairfax County Circuit Court persuasively summarized this well-established concept, explaining that "the only exception to the general rule that equity will not enjoin enforcement of the criminal law is if the statute sought to be enforced is unconstitutional and void." *Vegas Time Assocs., Inc. v. Granfield*, 12 Va. Cir. 223, 225 (Fairfax 1988). The *Daniels* Court did not refuse to enjoin enforcement of an unconstitutionally vague law. *See Daniels*, 285 Va. at 412–13. That Court's decision not to enjoin enforcement was based on its conclusion that there was no

unconstitutional vagueness, rather than a decision that it lacked power to issue an injunction when unconstitutional vagueness was found. *Id.*

II. CONSTITUTIONAL INFIRMITIES

A. The Ordinance Is Unconstitutionally Vague.

Defendants appears to believe that vagueness can be removed if they repeatedly restate the language of the Ordinance, and then implicitly insult anyone who cannot ascertain its bounds. Defs.' Mem. Opp'n to Pls.' Mot. Temporary Inj. at 7. Unconstitutional vagueness occurs when "one could not reasonably understand that his contemplated conduct is proscribed," and in cases where a law demands such guesswork, it is void for vagueness as a violation of due process. *Shin v. Commonwealth*, 294 Va. 517, 525 (2017) (quoting *United States v. Nat'l Dairy Prods. Corp.*, 372 U.S. 29, 32–33 (1963)). Vagueness permeates the entirety of Ordinance § 16-34(a)(4):

> In any public street, road, alley, or sidewalk or public right-of-way or any other place of whatever nature that is open to the public and is being used by, or is adjacent to, a permitted event, or an event that would otherwise require a permit.

The Ordinance leaves more questions than answers. Does it extend to businesses that are open to the public? How does this affect streets that are parallel to permitted events? How far does the prohibition extend down streets that may be perpendicular to permitted events? Does this zone move, creating a roaming gun-free zone, when a permitted event moves, such as a parade? Does such a gun-free zone move when an event otherwise requiring a permit moves, even if no permit was obtained, such as in the case of an unpermitted protest? Although perhaps inconvenient, had the legislature established a zone, similar to the zone around schools included as part of the federal Gun-Free School Zones Act,[2] at least it would be possible to determine without

[2] *See* 18 U.S.C. § 921(a)(25) ("The term 'school zone' means—(A) in, or on the grounds of, a public, parochial or private school; or (B) within a distance of 1,000 feet from the grounds of a public, parochial or private school.").

guesswork where firearms are prohibited. In Winchester, during events such as the recent Apple Blossom Festival,[3] with parades roving and events regularly popping up, is virtually the entire downtown area a gun-free zone? *See* Ex. A.

Unfortunately, these questions are not questions that someone of average – or even above average -- intelligence can discern. This constitutional infirmity is highlighted by the real potential for discriminatory and unfair enforcement. Without the constitutional minimum requirement of a measured distance in which firearms are prohibited from permitted events or events otherwise requiring a permit, police and gun owners alike are left to guess at when the Ordinance is violated.

B. Defendants Misstate *Presser v. Illinois* 116 U.S. 252, 265 (1886).

Under current law, should Plaintiffs gather at a permitted event, they must leave their firearms at home. Plaintiff Angel has expressed a desire to exercise both the right to speech and right to possess firearms as speech simultaneously. *See* Angel Aff. ¶ 5. He wishes to peaceably assemble with likeminded attendees to engage in the protected symbolic act of carrying a firearm while petitioning the government for redress of grievances. Compl. ¶ 102. This is not an action that *Presser*, as cited by the Defendants, outlaws. *See* Defs.' Mem. Opp'n to Pls.' Mot. Temporary Inj. at at 9.

The Court in *Presser* viewed the Second Amendment as a restraint only on the federal government. *Presser v. Illinois*, 116 U.S. 252, 265 (1886). This viewpoint has since been overturned by *McDonald v. City of Chicago*, 561 U.S. 742 (2010). With this understanding, it becomes clear that the *Presser* Court's determination that *state* restrictions on militias were not

[3] The Apple Blossom Festival, which includes several events around town and at least two parades, was held from April 22 to May 1, 2022. *See Festival Events*, SHENANDOAH APPLE BLOSSOM FESTIVAL, https://www.thebloom.com/events.html (last visited May 3, 2022).

violative of the Second Amendment *cannot* now be informative of whether such a gathering could constitutionally be prohibited by Virginia. *See Presser*, 116 U.S. at 253–54. An ordinance that allows for the expression of one fundamental right only at the expense of another is necessarily violative of both.

C. The Defendants Attempt to Resurrect a Failed Collective Rights Theory of the Right to Keep and Bear Arms.

The Defendants again fall back on the erroneous theory, directly contradicted by both the drafters of Article I, Section 13 and a current, sitting Virginia Supreme Court Justice, that the constitutional right to bear arms in Virginia is merely a collective right. *See* Defs.' Mem. Opp'n to Pls.' Mot. Temporary Inj. at 10. Justice McCullough has explained that the adoption of the proposed changes to Article I, Section 13 in the Virginia Senate, by a vote of 31 in favor to one opposed, operated as a "decisive rejection of the collective rights theory by the Senate of Virginia." Stephen R. McCullough, *Article 1 Section 13 of the Virginia Constitution: Of Militias and an Individual Right to Bear Arms*, 48 RICH. L. REV. 215, 227 (2013).

Defendant's collective rights argument fails for the same reason it failed in federal court with respect to the Second Amendment.[5] Defendants wholly ignore the grant of the right to "the people." In fact, Article I, Section 13 of the Virginia Constitution contains language not found in the Second Amendment. The word "therefore" makes clear that the operative granting of the right to "the people" is separate and distinct from the prefatory clause explaining the purpose of the right.

It appears that perhaps the Defendants grasp on to the collective rights theory because the constitutionality of the Ordinance crumbles with recognition of the individual right to keep and

[5] Lest there be any confusion in Defendants' minds, this and all references by Plaintiffs to the Second Amendment only discussive persuasive federal authority, making no claim under or reliance whatsoever on the Second Amendment to the U.S. Constitution as controlling authority.

bear arms. Although there has been scant interpretation of the Article I, Section 13 right, the minimal interpretation that exists vindicates the right to keep and bear arms in the very locations that the Ordinance restricts. In explaining why the right to bear arms could be restricted in government-owned school buildings, the Virginia Supreme Court distinguished other areas in which such restrictions would presumably be unconstitutional under Article I, § 13, such as "a public street or park." *DiGiacinto*, 281 Va. at 136. Notably, these are some of the very areas now restricted by the Ordinance.

Because Plaintiffs have expressed a desire to carry firearms for self-defense in places prohibited by the Ordinance, the Ordinance's restrictions strike at the very core of the right. *See* Compl. ¶¶ 34, 39, 45, 55. Indeed, "[i]ndividual self-defense is 'the *central component* of the right itself.'" *DiGiacinto*, 281 Va. At 134 (quoting *District of Columbia v. Heller*, 554 U.S. 570, 599 (2008)). While their individual reasons may differ (some are prior victims of robberies, *See* Nuckols Aff. ¶ 4; some wish to defend themselves and employees, Angel Aff. ¶ 8; Stickley Aff. ¶ 4; while others wish to carry firearms to defend themselves and their small children, Wilkerson Aff. ¶ 3), the Plaintiffs all have the universal desire to possess the necessary tools for self-defense. Because the Ordinance is violative of this fundamental, individual right, the Plaintiffs are likely to succeed on the merits with this challenge.

III. INJUNCTIVE RELIEF SHOULD ISSUE

A. The Balance of Equities Tip in The Plaintiffs Favor.

The Defendants explain that the Ordinance was adopted "to provide safe, local government facilities for the public's use, as well as a safe workplace environment for the City of Winchester employees." Defs.' Mem. Opp'n to Pls.' Mot. Temporary Inj. at 12–13. Nothing in granting Plaintiffs' request for injunctive relief would affect this goal. Not only do Plaintiffs

not challenge the City's ability to restrict firearms in "sensitive" government buildings, *DiGiacinto*, 281 Va. at 133, but Plaintiffs, like the City Council, also desire only safety in the challenged areas. In recognition of the fact that events, permitted and unpermitted, community centers, and public parks are potentially dangerous areas where one may be least likely to receive prompt assistance from law enforcement, Plaintiffs desire to be afforded the same right the police enjoy, the right to lawfully carry weapons to defend themselves. Plaintiffs are law-abiding and otherwise eligible to possess weapons. In fact, some studies suggest that Concealed Handgun Permit holders are more law-abiding than even the police, who are exempted by the Ordinance.[4] In Virginia, to be afforded the right to carry a firearm concealed, one must first take a safety class or otherwise demonstrate competency with a handgun. *See* Va. Code § 18.2-308.02(B). Plaintiffs are also restricted from engaging in otherwise dangerous activity, such as drinking in public, when carrying concealed firearms. *See id.* § 18.2-308.012. As a result, during an affair where some might drink, such as the Apple Blossom Festival, Plaintiffs still should have the right to carry as sober stewards of their safety and their families' safety. Winchester assumes the worst about its residents and visitors and the court should not follow the Defendants down that path. For the vast majority of Virginia's history, the carry of firearms has been the status quo—seemingly without issue—in the places now prohibited within Winchester.

The Defendants also contend that Plaintiffs are not abiding by the Ordinance, and furthermore that there is no evidence that the Ordinance is even being enforced. Defs.' Mem. Opp'n to Pls.' Mot. Temporary Inj. at 12–13. One possible reason that the Ordinance is not being enforced is because Concealed Handgun Permit holders, by and large, are law-abiding, and may be, although unwillingly, adhering to the restrictions unless and until injunctive relief is

[4] *See* Aaron Bandler, *Report: Concealed Carry Permit Holders Are the Most Law-Abiding People in the Country*, DAILY WIRE (Aug. 10, 2016), https://bit.ly/3w8Pc82.

granted. Alternatively, if the Defendants contend that they are voluntarily not enforcing the Ordinance today, then axiomatically, there can be no harm done by granting an injunction today to provide assurances that enforcement will not begin tomorrow.

B. A Temporary Injunction Serves the Public Interest.

Defendant's assert the benefit of enjoining an unconstitutional law is Plaintiffs' only argument on the public interest. Defs.' Mem. Opp'n to Pls.' Mot. Temporary Inj. at 13. If so, it is a dispositive argument. It is always in the public interest to issue injunctive relief to stop the continued application of an unconstitutional law. *See, e.g.*, *Martin-Marietta Corp. v. Bendix Corp.*, 690 F.2d 558, 568 (6th Cir. 1982) ("It is in the public interest not to perpetuate the unconstitutional application of a statute"). The Defendants continues to reiterate the circular argument that a law is constitutional until it is held to be unconstitutional. Here, the law is unconstitutional as applied to plaintiffs and those similarly situated, and it should be enjoined until such time as it is struck down.

Mark Stickley,
et al.
By Counsel

Gilbert J. Ambler
Ambler Law Offices, LLC
VSB No. 94325
P: 540-550-4236
F: 540-773-2414
E: Gilbert@amblerlawoffices.com
20 S Braddock St
Winchester, VA 22601

Robert J. Olson (VSB No. 82488)
William J. Olson (VSB No. 15841)
William J. Olson, P.C.
114 Creekside Lane
Winchester, VA 22602
Telephone: 540-450-8777
E-mail: wjo@mindspring.com
370 Maple Avenue West, Suite 4
Vienna, VA 22180
Telephone: 703-356-5070

David G. Browne (VSB No. 65306)
Spiro & Browne, PLC
6802 Paragon Place, Suite 410
Richmond, VA 23230
Telephone: 804-573-9220
E-mail: dbrowne@sblawva.com

CERTIFICATE OF SERVICE

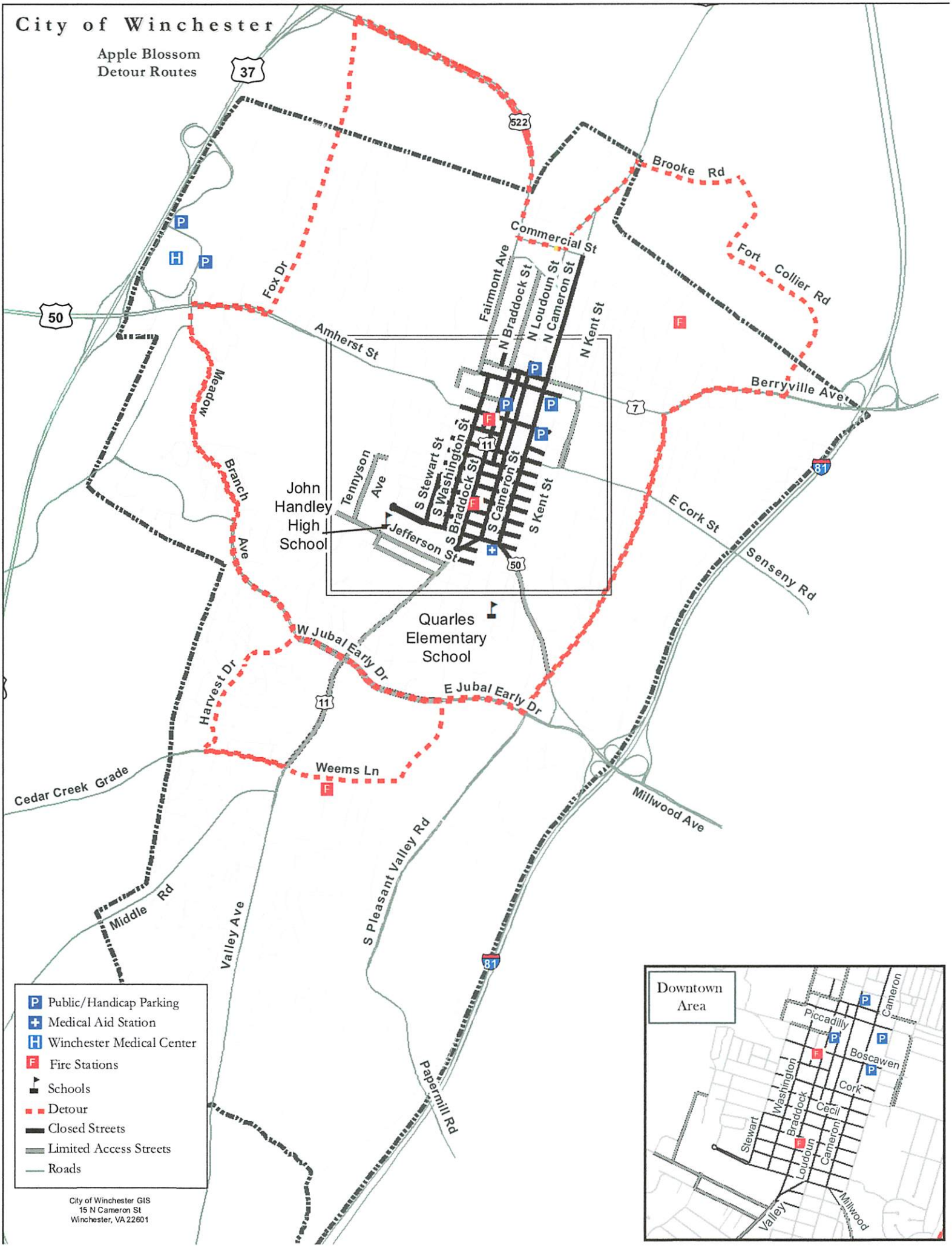
I hereby certify that a true copy of the foregoing was mailed, postage prepaid, as well as emailed on this 6th day of May, 2022 to:

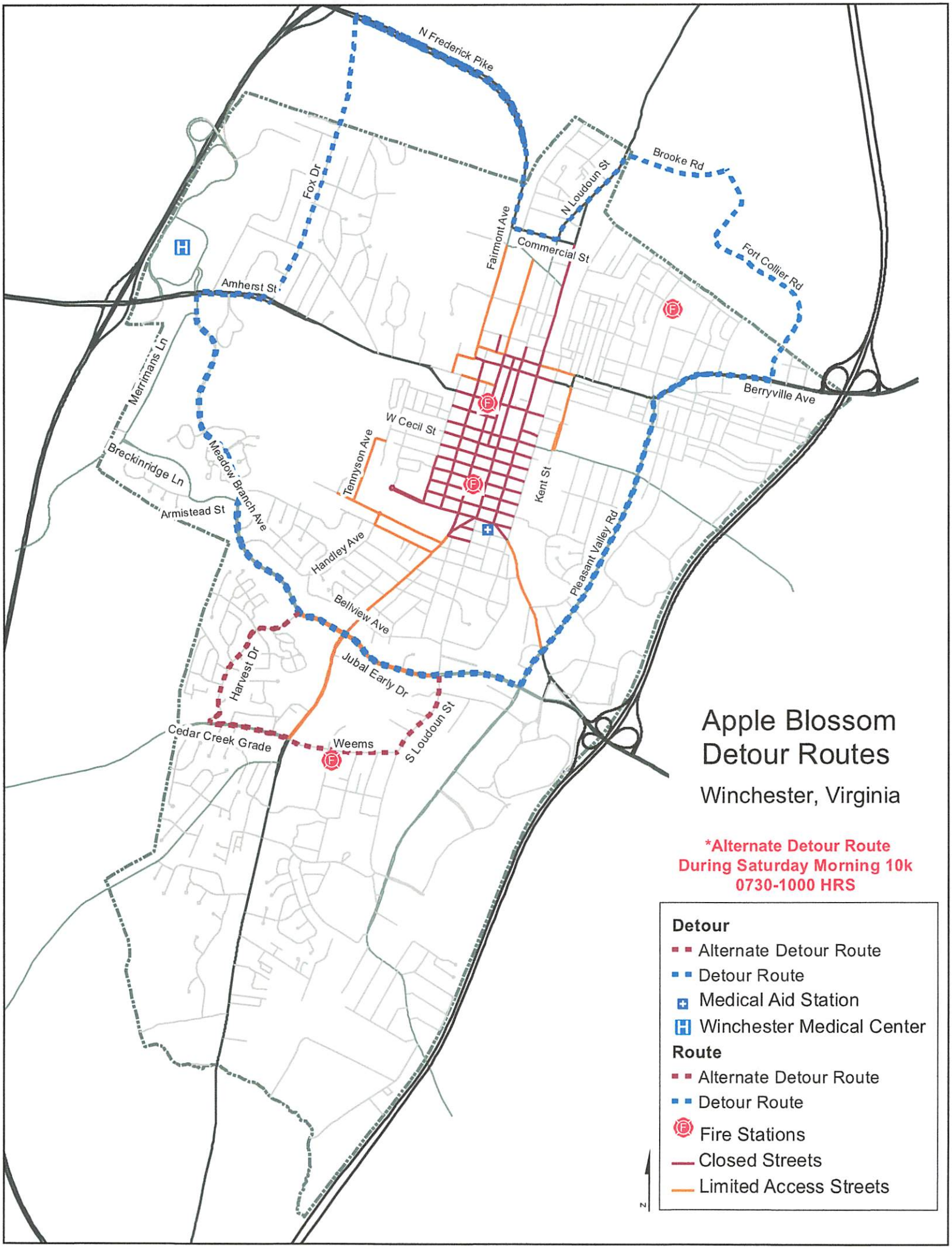
Heather Bardot
McGavin, Boyce, Bardot, Thorsen & Katz, P.C.
9990 Fairfax Blvd., Suite 400
Fairfax, Virginia 22030
hbardot@mbbtklaw.com

Date: 5-6-2022

EXHIBIT

“A”


City of Winchester
Apple Blossom
Detour Routes
37
522
50
7
11
81
Brooke Rd
Commercial St
Fort Collier Rd
Fox Dr
Fairmont Ave
N Braddock St
N Loudoun St
N Cameron St
N Kent St
Amherst St
Berryville Ave
Meadow Branch Ave
Tennyson Ave
S Stewart St
S Washington St
S Braddock St
S Cameron St
S Kent St
John Handley High School
Jefferson St
E Cork St
Senseny Rd
Quarles Elementary School
W Jubal Early Dr
E Jubal Early Dr
Harvest Dr
Weems Ln
Cedar Creek Grade
Millwood Ave
Middle Rd
Valley Ave
S Pleasant Valley Rd
Papermill Rd
Public/Handicap Parking
Medical Aid Station
Winchester Medical Center
Fire Stations
Schools
Detour
Closed Streets
Limited Access Streets
Roads
City of Winchester GIS
15 N Cameron St
Winchester, VA 22601
Downtown Area
Piccadilly
Cameron
Boscawen
Cork
Cecil
Washington
Braddock
Stewart
Loudoun
Cameron
Valley
Millwood


N Frederick Pike
Fox Dr
Amherst St
Merrimans Ln
Breckinridge Ln
Armistead St
Meadow Branch Ave
Handley Ave
Bellview Ave
Harvest Dr
Cedar Creek Grade
Weems
Jubal Early Dr
S Loudoun St
Tennyson Ave
W Cecil St
Fairmont Ave
N Loudoun St
Commercial St
Kent St
Pleasant Valley Rd
Brooke Rd
Fort Collier Rd
Berryville Ave
Apple Blossom
Detour Routes
Winchester, Virginia
*Alternate Detour Route
During Saturday Morning 10k
0730-1000 HRS
Detour
Alternate Detour Route
Detour Route
Medical Aid Station
Winchester Medical Center
Route
Alternate Detour Route
Detour Route
Fire Stations
Closed Streets
Limited Access Streets
N