

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

DISTRICT OF COLUMBIA,
400 6th Street, N.W., 10th Floor
Washington, DC 20001
Plaintiff,

v.

PROUD BOYS INTERNATIONAL, LLC.,
108 Durango Drive
Aubrey, TX 76227,

OATH KEEPERS,
5130 Fort Apache Road
Las Vegas, NV 89148,

RYAN ASHLOCK,
711 S. Spruce Circle
Gardner, KS 66030-1632,

JOSEPH RANDALL BIGGS,
114 Camino Circle
Ormond Beach, FL 32174.

MARC ANTHONY BRU,
10013 NE Hazel Dell Ave
Vancouver, WA 98685-5203,

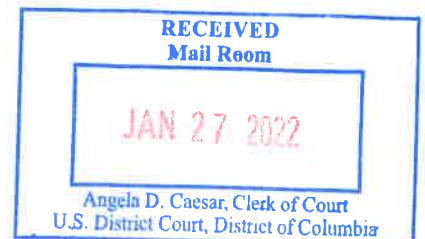
THOMAS EDWARD CALDWELL,
274 Wadesville Road
Berryville, VA 22611,

WILLIAM CHRESTMAN,
16393 S. Sunset Street
Olathe, KS 66062-2707,

LOUIS ENRIQUE COLON,
131 SW 27th St.
Blue Springs, MO 64015-3342,

DONOVAN RAY CROWL,
216 N. Main Street
Woodstock, OH 43084-9700,

1:21-cv-03267-APM



NICHOLAS DECARLO,
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Burleson, TX 76028-5220,

CHARLES DONOHUE,
2840 Cole Road
Winston Salem, NC 27107-4510,

KENNETH HARRELSON,
2885 Saint Marks Drive
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ARTHUR JACKMAN,
4030 N. Econlockhatchee Trail
Orlando, FL 32817-1327,

JOSHUA JAMES,
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Arab, FL 32817-1327,

JONATHAN PETER KLEIN,
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CONNIE MEGGS,
14100 SW 101 St LN.
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KELLY MEGGS
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SANDRA RUTH PARKER,
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Rochester, NY 14612,

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DANIEL LYONS SCOTT,
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LAURA STEELE,
249 Newcastle Ct.
Thomasville, NC 27360-7175,

HENRY "ENRIQUE" TARRIO,
5730 SW 142 Ct.
Miami, FL 33184,

JESSICA MARIE WATKINS,
2586 Hickory Mills Drive
Hilliard, OH 43026-9464,

CHRISTOPHER JON WORRELL,
282 Stanhope Cir.
Naples, FL 34104-0810,

GRAYDON YOUNG,
7147 Lago St.

Sarasota, FL 34241,

AND

JOHN AND JANE DOES 1-50

Defendants.

DEFENDANT CALDWELL’S ANSWER TO PLAINTIFF’S COMPLAINT

Defendant, Thomas E. Caldwell, acting *pro se*, hereby answers the Complaint of the District of Columbia, and asserts his Affirmative Defenses as follows:

General Denial of all Allegations Alleging Wrongdoing by Caldwell

Plaintiff makes a number of sweeping allegations against Caldwell and other co-defendants that are downright false. Without getting into the “weeds,” Caldwell denies that he: 1) entered the Capitol building on January 6, 2021 (“J6”); 2) assaulted any police officers or civilians; 3) entered into any conspiracy of any type of a criminal or civil nature; 4) sought to stop, hinder or delay the Electoral College proceedings; 5) was a member of the Oath Keepers or any other group mentioned in Plaintiff’s complaint; 6) or violated any of the statutes cited by Plaintiff as a basis for injunctive or compensatory relief under federal (or state) law. In short, Caldwell asserts that he did nothing wrong on J6.

Further, Caldwell states that he finds objectionable the actions of anyone on J6 who assaulted any person, especially police officers.

Affirmative Defenses

Plaintiff's Complaint should be dismissed based upon the following affirmative defenses:

A) Contributory Negligence: Plaintiff, the District of Columbia, in fact is significantly responsible for the damages alleged in the Complaint. For example, District Mayor Muriel Bowser refused to call in 20,000 National Guard troops to protect the Capitol building and other areas of the District, despite being advised by federal law enforcement officials and security officials to take this action. Also, Mayor Bowser and District officials allowed Antifa and BLM protestors to run amok in the District during 2020, essentially encouraging protestors to burn churches, businesses, cars, and buildings; allowing protestors to topple historical statues; fomenting a riot in front of the White House that resulted in numerous law enforcement officers being assaulted and injured and causing the U.S. Secret Service to evacuate President Trump from the Oval Office; failing to provide security for Republican U.S. Senators such as Rand Paul (R-KY), who was assaulted and mobbed by BLM and Antifa protestors; and otherwise encouraging and

tacitly approving of unruly and violent behavior. Mayor Bowser and District officials also literally handcuffed D.C. Metro Police and other law enforcement agencies in enforcing the law by threatening legal action against police for taking aggressive actions to quell left-wing violence in the District. Mayor Bower's incompetence, along with the incompetence of other District officials, clearly contributed to the damages and injuries that Plaintiff alleges in the Complaint. Accordingly, Plaintiff is barred from recovery based upon its contributory negligence.

B) Discriminatory Action—Next, Plaintiff is barred from recovery because they are going after Caldwell in this Complaint based upon his viewpoints and not his conduct, and thus the Complaint is in violation of Caldwell's 1st Amendment rights of speech, expression, and assembly. As noted, when left-wing protestors destroyed churches, statues, police cars, buildings, and other property, Mayor Bowser and District officials did nothing to quell these actions. When left-wing protestors assaulted police officers and civilians with impunity, the Mayor and local officials did nothing. When six Trump supporters were stabbed by left-wing protestors in December 2020, the Mayor and District officials did nothing. Now, the Mayor and District officials are suing Caldwell and others based upon their support of former

President Trump. This viewpoint-based discrimination is illegal and should result in the Complaint being dismissed.

C) The District should be barred from recovery based upon the concepts of estoppel, laches, and unclean hands. Plaintiff has never sued left-wing protestors who have caused damage, injured police officers, etc., which is an occurrence that happens regularly in the District. Moreover, Plaintiff and its counsel are obviously working hand-in-glove with the Democrat majority of Capitol Hill to use the instant Complaint to push a false narrative that J6 was an act of “domestic terror,” when in fact it was a protest that got out of hand.

Response to Factual Allegations in Complaint

The Complaint alleges factual allegations beginning at paragraph 50. As this Complaint is obviously a political document more than a lawsuit, with sweeping opinions and dubious conclusions, Caldwell finds it difficult to give straight “admit or deny” answers. Many allegations set forth claims to which Caldwell lacks sufficient, first-hand information to provide an answer. Additionally, many paragraphs contain multiple assertions and claims, which make it difficult to provide a clear-cut answer. Nonetheless, Caldwell will try to answer the Complaint:

50) Denied in part. The Defendant has never been a member of the Proud Boys, and thus lacks knowledge to answer any question about this organization. Instead of restating this fact throughout the Complaint, Plaintiff should assume that Caldwell reasserts his non-association with the Proud Boys in every paragraph relevant below.

51) Denied.

52) Denied.

53) Denied. From what I've heard and seen, the Proud Boys routinely get attacked by left-wing protestors, not vice-versa. It should also be noted that, from what I've heard, the Proud Boys are run by an African-American man and are often singled out by violent hoodlums who don't like their politics.

54) I lack sufficient knowledge to admit or deny this claim.

55) Same answer as paragraph #54.

56) Same answer as paragraph #54.

57) Same answer as paragraph #54.

58) Same answer as paragraph #54.

59) Same answer as paragraph #54.

60) Same answer as paragraph #54.

61) Same answer as paragraph #54.

62) Same answer as paragraph #54.

63) Same answer as paragraph #54.

64) Denied. The Oath Keepers, to my understanding, are patriotic Americans who follow the law and the Constitution. They assist law enforcement and communities from criminals. I personally have never heard of violent actions by Oath Keepers.

65) Denied.

66) Denied. The Oath Keepers are a peaceful bunch of ex-military and law enforcement folks who love their country.

67) I lack the knowledge necessary to answer this allegation as I am not an Oath Keeper member.

68) I lack the knowledge necessary to answer this allegation as I am not an Oath Keeper member.

69) I lack the knowledge necessary to answer this allegation as I am not an Oath Keeper member.

70) Denied. This is a gross exaggeration.

71) Denied. In fact, this allegation is patently ridiculous.

72) I lack knowledge necessary to answer this allegation fully.

73) I lack knowledge necessary to answer this allegation fully.

74) I lack knowledge to answer this allegation fully. However, if the Oath Keepers did go to Ferguson, Mo., I'm glad someone stood up for business owners and citizens who were targeted by left-wing protestors. The Oath Keepers did not burn down the City of Ferguson. The people who burned the City of Ferguson were left-wing agitators connected to BLM and Antifa.

75) I lack knowledge to answer this question but, again, good for the Oath Keepers if their presence stopped violent protestors from looting, pillaging and harming innocent citizens. Caldwell doesn't understand the Plaintiff's point. If Plaintiff wants to recoup damages for acts of civil disobedience, why is Plaintiff complaining about the Oath Keepers trying to stop violence, looting, and rioting?

76) I lack knowledge. However, if this person did the actions stated, shame on him.

77) I lack knowledge to answer as I was not an Oath Keeper member.

78) I lack knowledge. However, if urban mayors would enforce the laws, the Oath Keepers would not have believed it necessary to show up to help the police. Again, Caldwell is not a member of the Oath Keepers and has never trained with this organization.

79) Admitted. However, my understanding is that the Government authorized the defendant's release from solitary confinement after he pled guilty and promised him he would not do any more jail time. Essentially, prosecutors bribed this defendant into pleading guilty, which is concerning. Caldwell has never met this defendant.

80) Same answer as #79.

81) I lack sufficient knowledge of the Proud Boys to admit or deny this claim.

82) Denied. And President Trump was correct. The 2020 violence throughout American cities was caused by left-wing protestors.

83) Admitted. And President Trump was correct. The 2020 violence throughout American cities was caused by left-wing protestors.

84) Denied.

85) Denied.

86) I lack sufficient knowledge to give a fully informed answer.

87) Denied.

88) Denied as misleading. Plaintiff is undoubtedly taking these statements out of context.

89) This allegation states an opinion and is, therefore, denied.

90) Denied.

91) Denied as misleading. Caldwell has no personal information regarding this allegation, but the quotes are clearly taken out of context.

92) I lack information to fully answer this question but believe it to be true.

93) As I was not on this GoToMeeting, I lack knowledge to fully answer this allegation.

94) I lack sufficient information to answer this allegation.

95) I lack sufficient information to answer this allegation.

96) I lack information to answer this allegation. However, I believe that Watkins did write this.

97) Admitted. However, as you can see, this is exculpatory as it shows that Antifa was a very real threat that reasonable people were aware of.

98) I lack sufficient information to answer this allegation.

99) I lack sufficient information to answer this allegation.

100) Denied.

101) Admitted as likely true; however, my understanding is that the Proud Boys were attacked by Antifa. Suspiciously, Antifa always protested after dark, while Trump supporters protested in daylight, to my knowledge.

102) Admitted as likely true; however, my understanding is that the Proud Boys were attacked by a left-wing protestor, not vice-versa.

103) I lack sufficient information to answer this allegation.

104) I lack sufficient information to answer this allegation.

105) I lack information to answer this allegation. However, Plaintiff is obviously taking this comment out of context. This sounds like political rhetoric, like what you would see on an MSNBC show. To my knowledge, no Oath Keeper ever sought to overthrow the government.

106) Denied.

107) Admitted.

108) Admitted.

109) Denied. These were not “marching orders” to overthrow the government.

110) Denied. Obviously, reading comprehension is not Plaintiff’s strong suit. Mr. Meggs is clearly talking about stopping violent Antifa protestors, not a presidential election.

111) Denied. Caldwell was unfamiliar with this alleged plan, but it clearly appears to be a “plan” to stop violent left-wing activists that Plaintiff’s mayor and other leaders refused to arrest on prior occasions.

112) I lack information to fully answer this question.

113) I lack information to fully answer this question. However, I see nothing wrong with law-abiding citizens trying to stop violent left-wing activists with a history of burning churches, stabbing Trump supporters, toppling historical statues, and otherwise acting like criminals. Perhaps if Plaintiff had enforced the law in 2020, Mr. Meggs would have had no need to organize protection for peaceful protestors and DC residents. I have never met Mr. Meggs.

114) I lack information to answer this allegation.

115) I lack information to answer this allegation. I have never met Kelly Meggs in my life.

116) I lack information to answer this allegation.

117) Denied. No “attack” was ever “planned.” This is a flat out lie.

118) Denied.

119) I lack information to answer this question.

120) I lack information to answer this question.

121) I lack information to answer this questions.

122) Denied. There was no plan for attack.

123) I lack information to answer this allegation.

124) I lack information to answer this allegation.

125) I lack information to answer this allegation. I have no affiliation with the Proud Boys.

126) I lack information to answer this allegation.

127) I lack information to answer this allegation.

128) I lack information to answer this allegation.

129) I lack information to answer this allegation.

130) I lack information to answer this allegation.

131) I lack information to answer this allegation. However, I don't think it is unreasonable, based upon Plaintiff's deliberately creating an unruly atmosphere, for Trump supporters to wear defensive gear to protect themselves from Antifa and BLM.

132) Denied. Caldwell advised others that DC prohibits firearms, which is accurate. Caldwell never encouraged anyone to break the law.

133) Denied. The QRF was an extraction ^{concept/f.c.} [REDACTED] with a goal of rescuing those who were injured by Antifa and other violent extremists. The QRF to my knowledge had nothing to do with the Electoral College. In fact, per discovery in Caldwell's criminal case, every person allegedly connected to the "QRF" denied that [REDACTED] ^{it/f.c.} [REDACTED] had anything to do with entering the Capitol or committing affirmative acts of violence.

134) I lack information to answer this allegation.

135) Denied.

136) Denied as to the insinuation. Admitted that I booked a hotel room, with an AARP discount, prior to J6. This hotel was not for a criminal purpose.

137) Denied as to the insinuation that booking a hotel room and recommending the same hotel, with an AARP discount, was criminal in nature. Yes, I booked a hotel room and recommended that others stay at that hotel, which had easy access to DC and was inexpensive. Also, since Virginia elected officials are competent and don't typically put up with violence, I felt it was safer to stay in Virginia than DC.

138) I lack information to answer this allegation.

139) I lack information to answer this allegation.

140) Admitted. However, as multiple Oath Keeper defendants have stated, the term “hunting” meant “reconnaissance,” not actually killing people. Plaintiff will note that nobody was killed in DC on January 5th, and the only person who was killed on J6 was a Trump supporter named Ashli Babbitt.

141) Admitted.

142) Admitted.

143) Admitted. However, it should be noted that Plaintiff deliberately edited my quote, leaving out the part about how “Paul” was to “broken down” to be in DC on J6. Also, please note that the QRF was one guy—Paul, a 66 year old man with a bad back, bum knee, hip issues, and cardio-pulmonary issues. The notion that right-wing commandos were stationed outside of DC ready to launch an attack is laughable.

144) Admitted. However, this is misleading based on what I have heard. The firearms class was not for J6 specifically. It is patently absurd to think that Mr. Meggs brought his wife to DC for violence. Finally, I have never met either Meggs.

145) Denied.

146) Admitted but, of course, taken out of context.

147) Admitted as to the quote, but denied as to Plaintiff's insinuation. I'm obviously referring to Antifa. Plaintiff is exhibiting a pattern of selective editing.

148) I lacked sufficient information to answer this allegation.

149) I lack sufficient information to answer this allegation.

150) I lack sufficient information to answer this allegation.

151) I lack sufficient information to answer this allegation.

152) I lack sufficient information to answer this allegation.

153) Denied.

154) Denied.

155) Denied.

156) I lack sufficient information to respond to this allegation.

157) Admitted, but again this shows the incompetence of Plaintiff's elected officials. If Maryland officials knew of impending violence in DC, how come DC elected officials did nothing to stop it?

158) Admitted, but again, this shows the incompetence of Plaintiff's elected officials. So the Mayor and DC Metro Police knew about a planned attack on the

Capitol and did nothing? The Mayor had 20,000 National Guardsman at her disposal, but did not call them in until after J6.

159) Admitted. See paragraphs 157 and 158 above, too.

160) Denied.

161) I lack information to answer this allegation.

162) Denied. There was no conspiracy.

163) Admitted.

164) Admitted.

165) Admitted.

166) Admitted.

167) Denied. I did not prepare for violence. I was unarmed and was not wearing armor.

168) Denied. However, I admit I went to DC on J6.

169) I lack sufficient information to answer this allegation.

170) Admitted. But Plaintiff's quote is out of context.

171) Denied.

172) Denied.

173) Denied.

174) I lack information to answer this allegation.

175) Denied.

176) I lack information to answer this allegation.

177) I lack information to answer this allegation. However, there were tens of thousands of people who marched to the Capitol.

178) Admitted, but taken out of context.

179) I lack sufficient information to answer this allegation.

180) I lack sufficient information to answer this allegation.

181) I lack sufficient information to answer this allegation.

182) Admitted as to some defendants. However, Caldwell was not equipped with armor, weapons and special communications equipment. Caldwell only possessed a phone.

183) Denied.

184) Denied.

185) Denied.

186) Denied.

187) I lack sufficient information to answer this allegation. However, I have seen video of clashes with police.

188) I lack sufficient information to answer this allegation.

189) Admitted.

190) Admitted.

191) Denied. Caldwell never went into the Capitol Building, never assaulted police, or did anything illegal.

192) I lack sufficient information to fully answer this allegation. However, there were assaults on police officers by protestors, which was unfortunate.

193) I lack sufficient information to answer this allegation.

194) I lack sufficient information to answer this allegation.

195) Admitted.

196) I lack sufficient information to answer this allegation.

197) Admitted. However, as Plaintiff apparently does not realize, this text message gives Caldwell an alibi that he was not on Capitol grounds at the time the Capitol was being breached by hundreds of protestors. The “dry fountain” is in a traffic circle.

198) I lack sufficient information to answer this allegation. Yes, protestors did enter the Capitol. However, it is not clear if the window-breakers were Proud Boys or Antifa.

199) I lack sufficient information to answer this allegation.

200) I lack sufficient information to answer this allegation.

201) I lack sufficient information to answer this allegation.

202) I lack sufficient information to answer this allegation.

203) I lack sufficient information to answer this allegation.

204) I lack sufficient information to answer this allegation.

205) I lack sufficient information to answer this allegation.

206) I lack sufficient information to answer this allegation.

207) I lack sufficient information to answer this allegation.

208) I lack sufficient information to answer this allegation.

209) I lack sufficient information to answer this allegation.

210) I lack sufficient information to answer this allegation.

211) I lack sufficient information to answer this allegation.

212) I lack sufficient information to answer this allegation.

213) I lack sufficient information to answer this allegation.

214) I lack sufficient information to answer this allegation.

215) I lack sufficient information, however, I became aware later that Crowl had entered the Capitol.

216) Admit. However, I did not enter the Capitol.

217) I lack sufficient information to answer this allegation.

218) I lack sufficient information to answer this allegation.

219) Denied as to Caldwell or anyone associated with him.

220) I lack sufficient information to answer this allegation.

221) I lack sufficient information to answer this allegation.

222) I lack sufficient information to answer this allegation.

223) I lack sufficient information to answer this allegation.

224) I lack sufficient information to answer this allegation.

225) Admitted.

226) Denied. Caldwell had nothing to do with VP Pence suspending the Electoral College.

227) Admitted.

228) Admitted to the extent that law enforcement had a legitimate concern for the safety of elected officials and others and took appropriate action.

229) Denied as to Caldwell. Admitted that Congress suspended action.

230) Admitted. However, Caldwell did not enter the Capitol.

231) Admitted. However, news accounts have clarified that the plastic handcuffs were obtained inside the Capitol from a law enforcement stash.

232) Denied as to Caldwell. I did not enter the Capitol.

233) Admitted.

234) Denied as I did not cause havoc.

235) Admitted, however I did not attack police officers.

236) Admitted, but I did not spray officers or otherwise assault anyone.

237) Admitted, however I did not assault any officers.

238) I lack sufficient information to answer this allegation.

239) I lack sufficient information to answer this allegation.

240) I lack sufficient information to answer this allegation.

241) I lack sufficient information to answer this allegation.

242) I lack sufficient information to answer this allegation.

243) I lack sufficient information to answer this allegation.

244) I lack sufficient information to answer this allegation.

245) I lack sufficient information to answer this allegation.

246) I lack sufficient information to answer this allegation.

247) I lack sufficient information to answer this allegation.

248) Denied.

249) Admitted, but this allegation is stunningly dishonest. Caldwell was not actively chatting with the individuals at the time, who made these statements from 60 miles away while watching the events, presumably, on television, and sent the messages as a joke. Caldwell never entered the Capitol, and not one member of Congress was ever “hunted down.” Caldwell had no control over two adults sending childish messages to him.

250) Denied. Caldwell conspired with no one on J6. The individual who is quoted made that statement from 60 miles away while watching the events on television. In fact, federal prosecutors have backed off the incendiary claim that I was hunting down lawmakers.

251) I lack sufficient information to address this allegation.

252) I lack sufficient information to answer this allegation.

253) Admitted. But, again, Plaintiff’s Mayor and leadership were completely incompetent for not calling in the 20,000 National Guardsman that were at their disposal.

254) Admitted, but see paragraph #253.

255) Admitted. However, the exorbitant cost of security was because of fear that Antifa would stir up trouble. Again, as Plaintiff admits that they knew that J6 could have happened and did nothing, it would seem that Plaintiff is contributorily negligent.

256) Denied.

257) Admitted. However, why did the Capitol Police leadership not plan for J6?

258) Admitted.

259) Admitted.

260) Admitted.

261) Admitted.

262) Admitted that many officers were injured, but not by Caldwell.

263) Admitted that many officers were injured, but Caldwell lacks specific information.

264) I lack information to address this allegation.

265) I lack sufficient information to admit or deny this allegation.

266) I lack information to address this allegation.

267) I lack information to address this allegation, however I denounce anyone who harms police officers.

268) I lack information to address this allegation, however I denounce anyone who harms police offices.

269) Same answer as in paragraph #268.

270) Same answer as in paragraph #268.

271) Denied.

272) I lack sufficient information to address this allegation.

273) I lack sufficient information to address this allegation.

274) I lack sufficient information to address this allegation.

275) Denied.

276) Denied.

277) Denied. Caldwell did not injure any officers.

278) Denied.

279) Denied.

280) Denied.

281) Denied.

282) Denied.

283) Denied. This is a bald-faced lie. Nobody to my knowledge sought to harm VP Pence.

284) Denied.

285) Denied.

286) Denied.

287) Denied.

288) Denied

289) Denied.

290) Denied.

291) Denied.

292) Denied.

293) Denied.

294) Denied.

295) Denied.

296) Denied.

297) Denied.

298) Denied.

299) Denied.

300) Denied.

301) Denied.

302) Denied.

303) Denied.

304) Denied.

305) Denied.

306) Denied.

307) Denied.

308) Denied.

309) Denied.

Prayer for Relief

WHEREFORE, the Defendant denies that Plaintiff is entitled to any of the relief requested in the unnumbered “Prayer for Relief” clause following Paragraph 309, including subparts A-F, and respectfully requests that the Court dismiss the Complaint in its entirety and enter judgment in its favor and against the Plaintiff

The final paragraph also requires no response. To the extent that a responsive pleading is required, Defendant denies that Plaintiff is entitled to a jury trial.

Additional Affirmative Defenses

First Defense—The Complaint fails to state a claim against Defendant upon which relief may be granted.

Second Defense—Upon information and belief, Plaintiff's claims are barred, in whole or in part, based upon the doctrines of accord and satisfaction, release waiver, and estoppel.

Third Defense—Upon information and belief, Plaintiff's claims are barred, in whole or in part, by Plaintiff's failure to take reasonable steps to mitigate their claims of damages, the existence of such damages being hereby denied.

Fourth Defense—Plaintiff's punitive damages claims are barred because the Defendant did not act with malice or with reckless indifference to the protected rights of the Plaintiff.

Fifth Defense—Upon information and belief, Plaintiff's claims are barred as they have sought compensation under workers' compensation laws for police, or under union contracts, which bar outside recovery.

Sixth Defense—Plaintiff's allegations against Defendant are frivolous on their face and should be dismissed with prejudice as a matter of law.

Seventh Defense—Plaintiff's claims against Defendant are barred as its Complaint alleges that President Trump directed Defendant and others to engage in behavior

outlined in the Complaint. As such, President Trump and the Defendants have immunity from suit.

Eighth Defense—The Court lacks subject matter jurisdiction over this matter as Plaintiff's damages do not exceed \$75,000. Also, alleged violations of federal law alleged by Plaintiff do not apply to Defendant.

Ninth Defense—The Court does not have personal jurisdiction over Defendant.

Tenth Defense—Proper venue for this matter is the Western District of Virginia.

Eleventh Defense—Assumption of Risk by Plaintiff's employees, as police assume many risks by the nature of their work.

Twelfth Defense—Defendant's actions were protected by the First Amendment of the Constitution.

Thirteenth Defense—That Plaintiff, through the incompetence of its Mayor, elected officials, and other leaders, failed to activate 20,000 National Guardsman on J6 that would have prevented all the harms that they cite in their Complaint. This defense was set forth in fuller detail at the beginning of this Answer.

Fourteenth Defense—That Plaintiff is acting in a discriminatory manner by selectively pursuing civil action against the Defendant and others based on their support of President Trump, while it took no action against a single left-wing

violent agitator who did damage during the riots of 2020 or in similar protests over the years.

Fifteenth Defense—That many of the mental health injuries Plaintiff claims were suffered by Plaintiff's employees were actually caused by riots during 2020 and were pre-existing in nature to J6.

Sixteenth Defense—That Plaintiff's claims are barred by the statute of limitations.

Respectfully submitted,

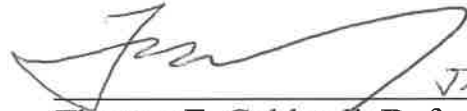

JAN 25, 2022

Thomas E. Caldwell, *Pro Se*
274 Wadesville Road
Berryville, VA 22611
(540) 303-3956
Redstart11@gmail.com

Dated: January 25, 2022

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 25, 2022 I emailed and mailed a copy of the foregoing Answer to Plaintiff's Complaint to Counsel of Record via the email addresses for counsel stated on the Complaint and by mail to Jeannie S. Rhee, Paul, Weiss, Rifkind, Wharton & Garrison LLP, 2001 K Street N.W., Washington, D.C. 20005.

 JAN 25, 2022
Thomas E. Caldwell, Defendant