

**UNITED STATES DISTRICT COURT  
DISTRICT OF COLUMBIA**

THOMAS TATUM  
Plaintiff

Case No. Case: 1:24-cv-00033 JURY DEMAND  
Assigned To : Walton, Reggie B.  
Assign. Date : 1/4/2024  
Description: Pro Se Gen. Civ. (F-DECK)

V.

Joseph Biden  
President Of The United States  
and  
METROPOLITAN POLICE  
And  
MPD sgt DANIEL THAU  
And  
USCP deputy chief ERIC WALDO, in his individual capacity and official capacity  
And  
USCP inspector THOMAS LOYD, in his individual capacity and official capacity  
And  
USCP sgt BRYANT WILLIAMS, in his individual capacity and official capacity  
And  
USCP Lt MICHAEL LEROY BYRD, in his individual capacity and official capacity  
And  
MPD commander ROBERT GLOVER, in his individual capacity and official capacity  
And  
MPD sgt FRANK EDWARDS, in his individual capacity and official capacity  
And  
MPD officer JIMMY CRISMAN, in his individual capacity and official capacity  
And  
MPD Sgt PAUL RILEY, in his individual capacity and official capacity  
And  
MPD Sgt TARA TINDALL, in his individual capacity and official capacity  
And  
MPD officer LILA MORRIS, in his individual capacity and official capacity  
And  
MPD Lt JASON BAGSHAW, in his individual capacity and official capacity  
And  
YOGANDA PITMAN, in her individual capacity and official capacity  
And  
JAMES RAY EPPS

And

JAMES MICHAEL JOHNSON

In his official capacity

As speaker of the house

And

BARRY LOUDERMILK, in his official capacity

Committee on House Administration Subcommittee on Oversight Chairman

Defendants

1. My name is Thomas Eugene Tatum, I am from Greenville, MS.
2. The named defendants are United States Capitol Police Officers and DC Metro Police Officers who were the most egregious offenders of police brutality in flagrant violation of the constitution, the law, and their own policies. All of this is set forth in detail in exhibit 1 to this complaint which is incorporated as if set forth fully herein.
3. A link to a video with a timeline of the events can be found here and is incorporated into this complaint. <https://open.ink/collections/j6>.
4. But for their actions, January 6, 2021 would have been a peaceful protest. My injuries set forth below were a direct and proximate result of their illegal actions.
5. James Ray Epps is named because there is copious evidence that clearly demonstrates that he "orchestrated" the chaos on January 6. I put "orchestrated" in comments because he himself texted that on January 6. The video clearly shows him at the front line of every significant flashpoint and breach. But for his actions, I would not have been injured.
6. On January 6th, 2001 I traveled to Washington D.C. to attend the "Stop The Steal" Rally near the Washington Monument.

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7. I prepared a presentation that describes the events of January 6, 2021. It is attached to this complaint as exhibit 1 and should be incorporated into this complaint as if set forth fully herein.

8. I arrived at the Ellipse area where Donald Trump was giving his speech after he had already started giving it but near the beginning.

9. I recorded Trump's speech on my cell phone for over an hour.

10. At the end of his speech, I walked directly to the west side of the Capitol by walking down the National Mall.

11. I arrived at the west plaza at the Capitol at around 2:27 pm.

12. Within moments I heard someone screaming about "tear gas" and within moments I could smell the tear gas.

13. This is when the police line fell on the west plaza at 2:30.

14. As this was happening the crowd started moving closer to the Capitol and I accidentally tripped because someone stepped on my shoelaces from behind and I fell.

15. Other protestors helped pick me up and we were all being sprayed with pepper spray from the police and the entire area had just been gassed with CS gas that caused the entire police line to collapse to begin with.

16. Then I followed the crowd up to the lower west terrace where I filmed what was happening for around 30 - 45 minutes.

17. I eventually moved closer to the lower west terrace tunnel.

18. At 4:21 pm, the police pushed protestors out of the tunnel down the steps causing a pile-up.

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19. When this happened Rosanne Boyland was pushed into me causing me to hit the ground beside her. As we hit the ground I remember seeing Rosanne was already bleeding from the nose and the mouth.

20. My leg was trapped by the handrail and I could not get up or do anything but pray. I was there for 8 minutes.

21. During that 8 minutes I, along with Rosanne and others, was repeatedly sprayed with OS and CS gas.

22. From the bottom of the pile up with people being thrown on top of us by police and through all the pepper spray I could see several of the cops steadily swinging their sticks at us and spraying pepper spray on us, pushing and shoving with other protestors. I remember hearing what sounded like explosions going off on top of us.

23. This entire time I had to struggle to breathe, I tried to cover my eyes from all the gas, and I put my head behind the handrail as I prayed to keep from being struck in the head.

24. Eventually, a stick or baton from the police broke my glasses after I was struck in the head during this time.

25. I thought my leg was going to snap in two and at one point, after a protester had been thrown into me by police I thought my back was going to be broken by bent over down a step as well.

26. Rosanne Boyland was unconscious this entire time and experienced everything and more than I did because she was not able to try to defend herself.

27. That is when Lila Morris picks up a stick and bashes it into the head of Rosanne Boyland. This happened at 4:27, right after other protestors trying to save us started pulling me

up out of the pileup and I started to turn a little stand up to get off my back and get away from  
the cops.

28. As I stood up on the steps I looked for and found Rosanne who was having CPR performed on her by others present. I remember looking down the tunnel at all the police and then turning and going down the steps.

29. I was completely drenched in either CS or OC spray and I couldn't see. I ended up finding a place to sit and people poured water in my eyes and on my skin for 30 to 45 minutes. I couldn't open my eyes during that time because it hurt so bad. I believe I was in shock also.

30. And about that time around 5 pm the police started shooting more CS gas, a lot of it this time on the lower west terrace from out of the tunnel and I got up and walked back down to the Washington Monument.

31. Those of us at the Western Terrace were peaceful. The police used excessive force on us that was not necessary and served no legitimate purpose.

32. They retaliated against us for exercising our right to free speech. The proof is that the same police did not use excessive force against the protestors who rioted throughout the same city in 2020, because they agreed with their viewpoint.

33. If I am arrested after filing this complaint it is clearly retaliation.

34. I witnessed Roseanne Boyland's death.

35. No investigation has been conducted by Congress.

36. I am seeking damages for the violation of my civil rights.

37. I am also seeking the Speaker of the House Michael Johnson and Committee on House Administration Subcommittee on Oversight Chairman Barry Loudermilk to conduct/order an investigation and hearing into police brutality that day and the death of Rosanne Boyland

38. I have witnessed several January 6th trials and I have testified during Brian  
Mock's trial and I don't believe I can receive a fair and impartial trial in Washington D.C.  
because of the highly partisan and historic nature in regards to all event surrounding January  
6th.

Date: January 3, 2024

Thomas Tatum

Thomas Tatum

105 Tate circle

Greenville, MS 38701