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

EDWARD JACOB LANG

Post Office Box 485 Narrowsburg, NY 12764

ALAINA TROCANO

and The plaintiffs' Motion for

Leave to File an Amended Complaint is GRANTED.

Dobuy L. Friedrich

Signed by Judge Dabney L.

and Friedrich on February 6, 2024.

(lcdlf2)

ALBUQUERQUE HEAD

and

ANGELA HARRELSON

and

BARTON SHIVELY

and

BRITANY PERKINS

and

CHRISTOPHER ALBERTS

and

CINDY LOU YOUNG

and

COUY GRIFFIN

and

DANIEL MICHAEL MORRISSEY

and

CIVIL

COMPLAINT (AMENDED FILING TO THE JANUARY 5<sup>th</sup>, 2024 SUBMISSION)

Civil Action No.

1:24-cv-00295-DLF

TRIAL BY JURY REQUESTED

CERTIFICATION OF A CLASS OF PLAINTIFFS WILL BE REQUESTED BY APPROPRIATE MOTION BY AN ATTORNEY ADMITTED IN THIS DISTRICT



DAVID JUDD				
and				
DAVID VALENTINE				
and				
DEREK KINNISON				
and				
DONALD CHILO	COAT			
and				
DONALD HAZA	RD			
and				
DOUGLAS A SWEET				
and				
ELIAS COSTIAN	ES			
and				
ERIC CLARK				
and				
ERIK SCOTT WARNER				
and				
ERNIE MARTIN	EZ			
and				
GABRIEL GARC	IA			
and				
GEORGE TANIO	o'S			

and				
GILBERT FONTICOBA				
and				
GINA BISIGNANO				
and				
HECTOR VARGAS				
and				
HENRY MUNTZER				
and				
ISAAC STEVE STURGEON				
and				
ISAAC THOMAS				
and				
JALISE MIDDLETON				
and				
JAMES BEEKS				
and				
JAMES BRETT				
and				
JAMES MCGREW				
and				
JARED LANE WISE				
and				

JEFFREY SHANE WITCHER				
and				
JENNI HEINL				
and				
JEREMY SORVISTO				
and				
JESSE RUMSON				
and				
JESSE WATSON				
and				
JOSHUA DOOLIN				
and				
K. NICOLE WILSON				
and				
KENNETH T HARRELSON				
and				
LEWIS WAYNE SNOOTS				
and				
LUKE COFFEE				
and				
MARC KAPLAN				
and				
MARK MIDDLETON				

	and
MICHAEL I	D ENNIS
	and
MICHAEL E	ECKERMAN
	and
MICHAEL T	THOMAS CURZIO
	and
MICHELLE	HELMINEN
	and
NANCY ELO	OISE SINGLETARY
	and
NATHAN D	EGRAVE
	and
PETER HAR	RDING
	and
PETER STA	GER
	and
RACHEL M	YERS
	and
RACHEL PO	OWELL
	and
RALLY RUI	NNER
	and

ROBERT DEGREGORIS			
and			
ROBERT NORWOOD			
and			
RONALD PALENTCHAR			
and			
RONALD SANDLIN			
and			
SCOTT FAIRLAMB			
and			
SEAN DAVID WATSON			
and			
SEAN HENRY			
and			
SEAN MCHUGH			
and			
SHAWNDALE CHILCOAT			
and			
SUZAN MCCLAIN			
and			
SUZANNE IANNI			
and			
TANLUI LP			

	and	
TRACI SUN	STRUM	
	and	
TREVOR BI	ROWN	
	and	
TRICIA LAC	COUNT	
	and	
TUCKER W	ESTON	
	and	
TYLER TEV	V	
	and	
WILLAM F	BEALS II	
	and	
ZACHARY.	JORDAN ALAM	
	and	
ZACHARY	REHL	Plaintiffs,
	v.	
Metropolitan	T DANIEL THAU, Police Department et, NW, 7th Floor DC 20001	
	and	
	ROBERT GLOVER Police Department	
	and	

PAMELA A. SMITH Current Chief of the Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001

and

ROBERT J. CONTEE III Former Chief of the Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001

and

SARGEANT FRANK EDWARDS Metropolitan Police Department In his individual capacity and official capacity

and

OFFICER JIMMY CRISMAN
Metropolitan Police Department
In his individual capacity and official capacity

and

SARGEANT PAUL RILEY
Metropolitan Police Department
In his individual capacity and official capacity

and

SARGEANT TARA TINDALL
Metropolitan Police Department
In her individual capacity and official capacity

and

OFFICER LILA MORRIS
Metropolitan Police Department
In her individual capacity and official capacity

and

LT. JASON BAGSHAW Metropolitan Police Department In his individual capacity and official capacity

and

OFFICER JOHN DOES 1-50 Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001

and

The DISTRICT OF COLUMBIA A Municipal Corporation, as Employer of Metropolitan Police Department Officers 441 Fourth Street, N.W. Washington, D.C. 20001

Serve for all D.C. Government Defendants: Karl A. Racine, Esq. Attorney General of the District of Columbia 400 6th Street, NW, Washington, DC 20001 Phone: (202) 727-3400

and

UNITED STATES CAPITOL POLICE, 119 D Street, N.E. Washington, DC 20510

and

J. THOMAS MANGER, in his official capacity as Chief of the U.S. Capitol Police, 119 D Street, N.E. Washington, DC 20510,

and

YOGANANDA PITTMAN in her official capacity as former Chief of the U.S. Capitol Police, 119 D Street, N.E. Washington, DC 20510

and

ERIC WALDO, Deputy Chief of the U.S. Capitol Police, in his individual capacity and official capacity

and

THOMAS LOYD, Inspector, U.S. Capitol Police, in his individual capacity and official capacity

and

SARGEANT BRYANT WILLIAMS, U.S. Capitol Police, In his individual capacity and official capacity

and

LT. MICHAEL LEROY BYRD U.S. Capitol Police, In his individual capacity and official capacity

and

THOMAS A. DIBIASE, in his official capacity as General Counsel for the U.S. Capitol Police, 119 D Street, N.E. Washington, DC 20510,

and

JAMES W. JOYCE, in his official capacity as Senior Counsel for the U.S. Capitol Police, 119 D Street, N.E. Washington, DC 20510

and

OFFICER JOHN DOES 51-100 U.S. Capitol Police 119 D Street, N.E. Washington, DC 20510

Defendants.

# AMENDED COMPLAINT FOR VIOLATION OF CIVIL RIGHTS AND PHYSICAL ASSAULT BY

#### I. INTRODUCTION

- 1. This lawsuit, brought under the Civil Rights Act 42 U.S.C. §1983, seeks money damages for the violations of the rights of Each of the Plaintiffs under the First, Fourth, Fifth, Eighth and Fourteenth Amendments to the Constitution for unreasonable seizure/excessive force and violations of Due Process which shock the conscience, as well as Federal civil rights defined by the laws of the District of Columbia, as well as claims brought under the laws of the District of Columbia, including common law claims for negligence, negligence per se, assault, battery, intentional infliction of emotional distress, and negligent infliction of emotional distress when they were beaten and illegally gassed by police officers at the U.S. Capitol or on U.S. Capitol Grounds on January 6, 2021, generally at various times between Noon and 6:00 PM EST.
- 2. Each Plaintiff has prepared his or her own Declaration labeled a Statement of Facts, sworn under oath, as an affidavit supporting the factual assertions stated therein and personalizing the otherwise identical Complaint to his or her own experience. Of course, the Plaintiffs cannot and do not swear to legal procedures or rules or precedents, but those speak for themselves. The Plaintiffs try to be clear where facts are not yet known and require discovery.
- 3. The Plaintiffs sue for each of their individual rights, *pro se*. However, they join their related and nearly identical claims from the same incident occurring on the same day and from closely related events caused by the same decisions and factors in this same document for judicial economical and an attempt at simplicity.
- 4. However, combining their related and very similar claims in the same document does not mean that any Plaintiffs appearing *pro se* is representing any other Plaintiffs. Each

Plaintiff is representing himself or herself. This combined Complaint occurs because of the nearly identical facts and nature of the Plaintiffs' claims, such that individual Complaints would be nearly exact copies of one another, which would be more complex rather than less.

- 5. Most of the Plaintiffs have been (wrongfully and unfairly) incarcerated awaiting trial during most of the time since these events of January 6, 2021, and blocked by their pretrial detention from being able to fully investigate the facts of these events (such as the identity of officers who assailed them, the policies and standing orders violated, the training they violated), or what their rights would entail or how to exercise their rights, and taking necessary actions without much more difficult efforts and arrangements than the average person.
- 6. Most of the Plaintiffs do not know the identity of most of the officers who assaulted them, gassed them with chemical agents, and the like.
- 7. In most cases, the U.S. Government, the Washington, D.C. Metropolitan Police Department, and/or U.S. Capitol Police do know the identity of the Plaintiffs' assailants.
- 8. Indeed, on information and belief, those assailants know that they assaulted the Plaintiffs, based on the fact that they were recorded on body-worn cameras their own body-cams or body-cams of other officers, and/or thousands of mobile smart phones equipped with fairly sophisticated hand-held video cameras. Those officers who engaged in excessive use of force, police brutality and other violations such as illegal discharge of gasses would have been interviewed within the course of their employment for a review of their conduct on January 6, 2021.

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The U.S. Capitol Police were generally not equipped with body-cam videos whereas all MPD officers of Washington, D.C. were. Police from Maryland who came to the U.S. Capitol were sometimes equipped with body-cams as new policy. However, even those who did not themselves wear body-cams were filmed by the body-cams of others.

- 9. However, the Government has engaged in the most massive cover-up of information required to be disclosed by *Brady v. Maryland* since the creation of the Federal Bureau of Investigation.
- 10. The Department of Justice has been prosecuting Plaintiffs and others for three years and during what is called the most massive investigation in U.S. history has actively concealed for those three years the identity and evidence of police assaults on January 6 demonstrators.
  - 11. This information has been concealed including through court protective orders.
- 12. Plaintiffs reasonably expected that the identity of their assailants would be revealed by now.
- 13. The Former Speaker of the House of Representatives Kevin McCarthy who has authority over the U.S. Capitol Police along with the President of the Senate promised in January 2023 to release all information about the events of January 6, 2021, known to the U.S. Capitol Police and the House through its former Select Committee, including an estimated 44,000 of hours of video recordings. (Prosecutors claim they have 14,000 hours, although that might be the videos after filtering them for the prosecutors' opinions of what is relevant.)
- 14. He did not, with a few exceptions of allowing one opinion journalist to see a few of those videos. Immediately upon Tucker Carlson actually revealing a tiny few minutes of video, he was fired from Fox News and no further information was revealed.
- 15. Only in mid-November 2023, did the new Speaker of the House Mike Johnson who replaced Kevin McCarthy over a long list of large and small broken promises including the withholding from the American people of the January 6 video recordings keep that promise that McCarthy had made in early January 2023.
  - 16. Now, a few new videos are slowly trickling out to the public from the U.S. Capitol

Police and the files of the now-closed Select Committee.

- 17. But now we are learning that the Select Committee destroyed evidence, consisting not only of the video recordings of 1,000 interviews for which transcripts were kept, but in fact many of those witness transcripts have also been destroyed and other information has been destroyed in an obvious conspiracy of obstruction of justice and destruction of evidence.
- 18. Ironically, the DOJ has charged many January 6 demonstrators with crimes for doing what we now know that the Congressional Members and staff of the Select Committee committed. There is no immunity for such destruction of evidence by the Select Committee, and in fact it violates Congressional rules. Yet no indictments have been issued against the Select Committee, no Special Counsel appointed, no interest of any kind of the Congress' destruction of evidence relevant to grand jury considerations and on-going prosecutions.
- 19. Under the standard law of *spoliation of evidence* the Plaintiffs are entitled to a presumption and evidentiary inference that the missing evidence would have exonerated them of crimes and shown the violent attacks by police against the Plaintiffs, being one of the reasons the Select Committee destroyed the evidence. The political agenda and narrative of the Select Committee required that the facts be carefully tailored to fit.
- 20. A video timeline incorporating newly available video evidence was just published at <a href="https://open.ink/collections/j6">https://open.ink/collections/j6</a>. For the first time, the American people can see for themselves the boisterous and energetic but peaceful crowd of pro-Trump demonstrators attacked and assaulted by police officers, and how that police violence sparked a reaction of brawling and conflict by a few with the police officers who were savagely attacking previously-peaceful demonstrators. This is not opinion. It is shown on video recordings for all to see.
  - 21. In Select Committee "hearings" set for evening and professionally produced by a

TV news producer James Goldston, former President of ABC News, police officers testified that on the Lower West Terrace the officers were slipping on blood.

- 22. Now we can see on video with our own eyes that it was the blood of the demonstrators whom police officers had attacked previously unprovoked.
- 23. When one side of Joshua Black's face was blown out by munitions from police, we can see where the blood on the floor came from. It was not from officers.
- 24. And we can watch on the video when the loud and demanding but peaceful crowd suddenly reacts to this police violence by shouts and gestures and eventually confrontation.
- 25. However, even where we can watch on video some of it still sealed under protective orders the Plaintiffs and others being assaulted by police, we often do not know the identity of those officers. Their employers do know.
- 26. Accordingly, the Plaintiffs must sue now and pursue discovery to determine the identity of their assailants.
- 27. Plaintiffs emphasize that they are not referring to injuries suffered while initiating any violence. They are referring to violence and gassing initiated without justification by law enforcement officers,<sup>2</sup> which then after that quickly turned into a riot as demonstrators clearly shown on video recordings demanded that officers stop throwing a grandmother off steep stairs (three times), stop suffocating Roseanne Boyland not so different from what Derek Chauvin is serving a prison sentence for, stop firing bullets at demonstrators such as those that blew up half of Joshua Black's face, throwing Derrick Vargo 25 feet off the side of the marble stairs onto the hard ground below, and the like. The Defendants created the circumstances which they then in a

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Note that the Government which initiated violence on January 6, 2021, charged many demonstrators with 18 U.S.C. 111(a)(1) which

time-travel reversal claimed as the justification for their excessive use of force.

- 28. Furthermore, the Defendants mistakenly believe that mere presence on the Capitol Grounds is justification for their violence and/or arrest. But 18 U.S.C. 1752 only applies to a building or grounds closed *because of the presence of a Secret Service protectee*. It is not just any time an area is closed. Closure for COVID does not count for a violation of 18 U.S.C. 1752. Plaintiffs allege that the evidence will show that some of the Capitol Grounds was closed in September 2020 before the 2020 election for the purposes of workers erecting the inaugural scaffolding. Apparently, no Capitol grounds were closed pursuant to 18 U.S.C. 1752.
- 29. Furthermore, because Suspicious Actors are seen on video removing light chicken fencing and snow fencing with flimsy signs "Restricted Area" (apparently just photocopies on 11" by 14" photocopy paper laminated in a plastic film) attached were removed and the vast majority of demonstrators could not see signs that were no longer present when they arrived.
- 30. As Judge Cooper recently ruled in dismissing "restricted area" charges, the Government must prove that it provided adequate notice to the public of a closure. It did not.

### II. JURISDICTION AND VENUE

- 31. This Court has subject matter jurisdiction over this case pursuant to 28 U.S.C. § 1331 (Federal Question Jurisdiction, 42 U.S.C. 1983, and 28 U.S.C. § 1332 Diversity Jurisdiction) because the amount in controversy exceeds \$75,000 and there is complete diversity amongst the parties.
- 32. This Court has supplemental jurisdiction over this case pursuant to 28 U.S.C. § 1367.
- 33. Jurisdiction is also proper under *Bivens v. Six Unknown Named Agents*, 403 U.S. 388 (1971), in so far as the actions violate the 1<sup>st</sup>, 4<sup>th</sup>, 5<sup>th</sup>, and 14<sup>th</sup> Amendments to the U.S.

Constitution.

- 34. To the extent that the District of Columbia and/or its Metropolitan Police

  Department are governed by the Federal Government, this Court also has jurisdiction under 28

  U.S.C. § 2680(h).
- 35. Venue is proper pursuant to 18 U.S.C. § 1965 and 28 U.S.C. § 1391(b)(2), (3) a substantial part of the events or omissions giving rise to the claims occurred in this judicial district and Defendants are subject to personal jurisdiction in this District.

#### III. DEFINITION OF ADDITIONAL CLASS MEMBERS

36. Initially, for the assistance of any persons who may be affected, and in the public interest, it should be clearly stated that <u>any person who would otherwise fall within the</u>

definition of a class for a class action has the right to "OPT OUT" of the class.

Misunderstanding that any person would be made a member of a class who does not wish to be should be clarified and avoided. A class action provides an opportunity for injured or affected persons to be included at relatively low cost, efficiently. It is not a means of requiring anyone to play any role if they do not wish. A person who may have a claim is free to consult their own attorney or prospective attorney, pursue their own separate legal case independent of the class action, or choose not be included in any legal action.

- 37. It is expected that at least one attorney will file the appropriate motion to certify a class action, who will act as their legal representative as required, who is currently on business overseas. In the name of full disclosure, Plaintiffs would not deprive the Defendants of awareness of discussions and plans.
- 38. The definition of the proposed class is demonstrators at and around the U.S.

  Capitol building and its grounds who were physically assaulted, gassed with dangerous chemical

munitions, or otherwise injured physically or through emotional distress through excessive use of force, unnecessary use of force, unprovoked use of force, and/or police violence on the afternoon of January 6, 2021, on Capitol Hill at the U.S. Capitol complex.

#### IV. PARTIES

#### **Plaintiffs**

- 39. Each of the Plaintiffs are individuals who were demonstrators at or around Capitol Hill who were physically injured by attacks from the Defendants, being law enforcement officers and their employers.
- 40. Each of the Plaintiffs has prepared his or her own Statement of Facts about their individual circumstances and experiences which they ask to be legally attached as an exhibit to their Complaint.

#### **Defendants**

- 41. Defendants are officers of the U.S. Capitol Police and the Metropolitan Police Department
- 42. Defendant ROBERT J. CONTEE III is Chief of the Metropolitan Police Department who is the supervisor and superior of the police officers of the Metropolitan Police Department of the District of Columbia who physically assaulted the Plaintiffs.
- 43. Each of the Defendants OFFICERS JOHN DOES 1-50, as captured and recorded on video, is a police officer of the Metropolitan Police Department of the District of Columbia, who participated with, conspired to, and aided and abetted in physically assaulting the Plaintiffs, but their identity has not yet been identified.
- 44. Each of the Defendants OFFICERS JOHN DOES 51-100, as captured and recorded on video, is a police officer of the U.S. Capitol, who participated with, conspired to, and aided and

abetted in physically assaulting the Plaintiffs, but their identity has not yet been identified.

45. Defendant District of Columbia is a municipal corporation constituting the city government of Washington, D.C.

#### V. FACTS ALLEGED COMMON TO AND SUPPORTING ALL COUNTS

- 46. Plaintiffs re-allege and rely upon all factual allegations above including those stated within the descriptions of the Parties, and alleges these facts for the purposes of each and every cause of action as if stated specifically under each Count below.
- 47. Each of the Plaintiffs incorporates by reference as if set forth herein the timeline and video record moment by moment of events on January 6, 2021, published last week from recently released video at <a href="https://open.ink/collections/j6">https://open.ink/collections/j6</a>. Specifically, the Plaintiffs rely upon, incorporate, and allege the actual videos recorded by law enforcement officers, by the U.S. Capitol's security camera system, and other videos presented in the documentary, including all videos presented in order chronologically and in full without editing or fragmentation, and including the comparisons by montage of what was happening at the same time in different places as recorded in various cameras. The commentary superimposed on those videos might not be admissible but A.J. Fischer and others may testify to witnessing the events described.
- 48. Each of the Plaintiffs has written for himself or herself his and her own Statement of Facts as a Declaration of the individual circumstances and injuries they suffered, which are attached or will be supplemented.
- 49. Each of the Plaintiffs incorporates by reference as if set forth herein his or her Statement of Facts, which will probably not be attached at first filing because most of the Plaintiffs are incarcerated and have texted or dictated their own personal statements but have difficulty signing them in prison. The Statement of Facts will be filed shortly as a Supplement

with the request that they be legally considered attached to this Complaint.

50. Plaintiffs emphasize that this is not about demonstrators being injured in the course of fighting with police, but are injuries resulting from attacks from officers at the officers' initiative. At 2:38 PM, Donald Trump tweeted:



51. At 3:13 PM, Trump tweeted out



- 52. It is unlawful for Defendants to use dangerous but misnamed "less than lethal weapons" like plastic or rubber bullets at any person's head. They must be aimed at their torso, if at all.
- 53. However, the Defendants through their own personal actions, and/or their training, orders, and instructions to officers, knowingly and intentionally violated that rule.
- 54. D.C. law mandates three (3) warnings before using very dangerous so-called "less than lethal weapons" plus ensuring that demonstrators have a pathway to comply with warnings to disperse (or leave) by having the ability to leave.
- 55. Ordering protestors in closest proximity to police lines to depart is a clear and explicitly-identified violation of D.C. law if protestors so warned are not able to comply.
- 56. On January 6, 2021, with crushes of new demonstrators constantly arriving "behind" (farther away from the police lines), these Plaintiffs and other demonstrators were unable to depart, being crushed from "behind" (from the point of view of the police lines) with

no pathway to leave.

- 57. Of course, again, the police on scene on January 6, 2021, did not give the required warnings either.
- 58. Video catches one leading officer calling out over the radio that they had given warnings when the video shows that to be a lie. A leading officer is caught clearly lying.
- 59. Ironically, while the use of gas on January 6, 2021, was in violation of the officers' training, standing orders, and manufacturers' instructions, the police officers mostly gassed themselves by recklessly throwing massive gas canisters, including explosive canisters, without regard for the wind that was blowing back in their direction.
- 60. Therefore, officers were driven away from their positions by the gas they themselves launched recklessly into the wind.
- 61. Then of course the officers, mostly out-of-control MPD officers, "testi-lied" on this and many topics, using the passive voice to complain about "being gassed" to falsely accuse the demonstrators when in fact the officers are seen on video recordings gassing themselves.
- 62. Almost every aspect of events on January 6, 2021, has been lied about by a few officers, while other officers have been cowed into silence rather than telling the truth.
- dishonestly aired heavily edited (that is, misleading fragments and snippets) videos of a very, very few demonstrators who got into skirmishes, the public has not been able to see until mid-November 2023 the entire sequence of events in which police officers sparked and provoked a violent reaction from the crowd such as by throwing an elderly woman down the stairs three times, committing the attempted murder<sup>3</sup> of Derrick Vargo by throwing him off the side of a

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Following the same charging philosophy prosecutors are using.

massive stair case about 25 feet above hard ground below, and blowing out one side of Joshua Black's face with munitions.

- 64. Now that we can see the entire, uninterrupted sequence of events without the blinders placed on the videos by the Government, we can see that the Defendants took a large but ordinary (for Washington, D.C.) large protest and created a maelstrom of violence.
- 65. In December 2020, the U.S. Capitol Police issued six (6) permits<sup>4</sup> to authorize demonstrations on the U.S. Capitol Grounds for the afternoon of January 6, 2021:
  - (a) Virginia Freedom Keepers, Senate Park Area 7
  - (b) Women for a Great America, House East Front, Grassy Area 10
  - (c) Bryan Lewis, Senate East Front, Grassy Area 9
  - (d) One Nation Under God, Senate East Front, Grassy Area 8
  - (e) Rock Ministries, International, House East Front, Grassy Area 11
  - (f) Jesus Lives, West Front Grassy 1 on January 5, 2021, and Area 15 on January 6, 2021
- 66. Because humans cannot fly through the air, these permits include the right to walk to and fro to each of these planned demonstrations and walk among them to visit them all.
- 67. However, the U.S. Capitol Police provides no sign posts, sign poles, plaques, or map or other indication of where permitted demonstrations are to take place. There was and still is only grass with no clue where the USCP has issued permits for demonstrations.

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Jason Leopold, "The Capitol Police Granted Permits For Jan. 6 Protests Despite Signs That Organizers Weren't Who They Said They Were," <u>Buzzfeed News</u>, September 9, 2021, updated September 17, 2021, <a href="https://www.buzzfeednews.com/article/jasonleopold/the-capitol-police-said-jan-6-unrest-on-capitol-grounds?origin=web-hf">https://www.buzzfeednews.com/article/jasonleopold/the-capitol-police-said-jan-6-unrest-on-capitol-grounds?origin=web-hf</a>. To the best of Plaintiffs' knowledge, these permits were never revoked.

- 68. Upon arriving at the Capitol, with a massive crowd larger than expected, no one knew where these lawfully-permitted demonstrations were supposed to occur. Instead, people gathered toward the Capitol building.
- 69. On January 6, 2021, Plaintiffs were engaged in Constitutionally protected speech and/or activity, petitioning the Congress for redress of grievances, and peaceful assembling by peacefully protesting at the U.S. Capitol building.
- 70. Mayor Muriel Bowser (functioning like the Governor of a State) of the District of Columbia declared the demonstrations of January 6, 2021, as a "First Amendment Activity," legally establishing it as such and triggering D.C. and Federal laws and rights.
- 71. That designation has strong legal consequences under D.C. law governing the Metropolitan Police Department including the requirement to give at least three (3) clear orders to disperse, but more important to ensure a pathway by which demonstrators are able to leave, which was not done on January 6, 2021.
- 72. An estimated 500,000 to possibly 1 million demonstrators came to Washington, D.C. to hear the last expected speech of Donald Trump as President at the Ellipse and demand that the Congress follow the Constitution. They had good reason to expect they would not.
- 73. According to the U.S. Capitol Police, an estimated 10,000 demonstrators were scattered around Capitol Hill, a tiny percentage of which entered the Capitol building and a tiny percentage got involved in fist fights, brawls, and conflicts.
  - 74. The popular narrative is that all demonstrators did exactly the same thing.
- 75. Of course it would be logically absurd to suggest that all police officers acted the same way on January 6, 2021.
  - 76. It would be equally absurd, logically, to suggest that all demonstrators acted the

same way on January 6, 2021.

- 77. Fortunately, we have approximately 44,000 hours of video recordings which Speaker Mike Johnson has only just started to release publicly.
- 78. While demonstrators could exercise their constitutional rights to demand that the Congress follow the law and follow the Constitution faithfully on January 6, 2021, it was completely impossible to extend the term of President for Donald Trump by one (1) second past Noon on January 20, 2021, nor to change the next President even if demonstrators had stopped the Joint Session of Congress by which the President of the Senate (the Vice President of the United States has the right to step in and serve as President of the Senate) counts the Electoral College votes in the presence of the Congress, and Congress has the Constitutional power and duty to object to the Electoral College votes of individual States where the validity of Electors is in question.
- 79. Demonstrators could and did publicly insist that Congress not cheat in the counting of the Electoral College votes as they had just seen State officials cheat.
- 80. Demonstrators could not and did not interfere in the transfer of presidential power.
- 81. The Office of the President of the United States of America was created by the U.S. Constitution and its ratification, so that on March 4, 1789, the first term of President began.
- 82. President George Washington was notified of the Electoral College decision on April 14, 1789, and inaugurated as the first occupant of the office on April 30, 1789.
- 83. Every four years, the occupant of the continuing office of President is changed or renewed for a second four-year term.
  - 84. The occupant of the office of President is chosen by the Electoral College, whose

Electors were originally selected by the State legislatures and expected to exercise their good civic judgment independent of their appointment to choose the next President.

- 85. According to Article II, Section II, of the U.S. Constitution, the State legislatures have the sole power to choose the Electors or the method of their selection.
- 86. Given that no popular vote to select Electors is referenced in the Constitution until Amendment XIX mandated that States extend voting rights to women, a popular vote in a State to select the Electors for President cannot be presumed to be a preferred method, although it has become a universal desire and expectation that the people choose their President.
- 87. Nevertheless, U.S. citizens vote for Electors in the Electoral College. They do not vote for the next President. They vote only for Electors, if that is how the State legislature has decided to choose Electors (which all have at this point).
- 88. Under Amendment XII and Amendment XX of the U.S. Constitution, a President's term of office ends on January 20 at Noon, when the unstoppable rotation of the planet Earth around its axis brings the January sun to its highest point for the day Noon in the Nation's Capitol, now Washington, D.C.
  - 89. No presidential power is transferred on January 6 of any year.
- 90. No demonstrators can stop the rotation of the Earth to delay or prevent the coming of Noon on January 20 every four years.
- 91. Almost every election, Democrats and only Democrats urge Republican Electors to vote for the Democrat candidate for President not the Republican candidate for whom they were pledged when chosen to serve as Electors in various States.
- 92. The original concept in the Constitution is that the Electoral College would make its own decision as a group of wise, experienced, and respected (originally) men as to whom

would make the best President of the United States, not that the people would choose the President in a popular vote.

- 93. Therefore, no one present in Washington, D.C., on January 6, 2021, did or could or attempt to "prevent the transfer of presidential power" which occurs automatically upon the clock striking Noon on January 20, and not by any human activity.
- 94. Given that mass demonstrations of hundreds of thousands of people are normal and common in Washington, D.C., there was no necessity to clear the U.S. Capitol Grounds of people for its own sake.
- 95. Given that the Congress routinely does business despite having hundreds of visitors in the 750-foot long Capitol building, the police should have been prepared for a different strategy of handling demonstrators and the attacks on the Plaintiffs are not justified.
- 96. Plaintiffs and other January 6 Defendants have access to the recordings of police radio traffic among officers from January 6, 2021.
- 97. Police radio recordings show Robert Glover, and others, whipping other officers hundreds able to hear the radio traffic into a state of panic. The average police officer unable to see what was going on would be led to believe that it was the end of the world, so to speak, such as with calls of "shots fired!" without clarifying that it was a police officer doing the shooting, murdering under D.C. law Ashli Babbitt. Therefore, officers would think that shots had been fired by demonstrators against police officers, the opposite of the truth.
- 98. Robert Glover and others including Yogananda Pittman exaggerated and embellished actual events so as to spread an atmosphere of fear, panic, and hysteria over the radio headsets of police officers on Capitol Hill on January 6, 2021.
  - 99. As a consequence, police officers abandoned and violated their training, the

instructions for the use of their equipment such as gas, and the laws governing proper actions in a mass demonstration (of which Washington, D.C., has many rather frequently).

100. The Plaintiffs' injuries were proximately caused by the conduct of Defendants, each and every one of them, jointly and severally.

#### **Diversity of Citizenship**

- 101. None of the Plaintiffs are residents of the District of Columbia, Maryland, or Virginia.
- 102. The Defendants are residents of the District of Columbia or neighboring States Virginia or Maryland, and commute to work within the Metropolitan Police Department of the District of Columbia.
- 103. There is complete diversity of citizenship between the Plaintiffs and all Defendants.

#### **CAUSES OF ACTION**

# FIRST CAUSE OF ACTION Assault and Battery

- 104. Plaintiffs repeat and re-allege all of the previous allegations of the entirety of this Complaint with the same force and affect, as if fully set forth herein again at length.
- 105. Defendants directly or by subordinates or agents caused or committed assault and/or battery against each of the Defendants placing each of the Defendants in imminent fear of bodily injury and physically injuring and harming the Plaintiffs through physical battery against them.
- 106. Defendants' assault and battery was not privileged or justified including because Defendants initiated violence against the Plaintiffs and because Defendants failed to comply with

the legal requirements for escalating a demonstration into the use of force.

### SECOND CAUSE OF ACTION

Negligence Per Se in Assault on Plaintiffs with Chemical Agents in Violation of Law, Training, and Manufacturer's Instructions

- 107. Plaintiffs repeat and re-allege all of the previous allegations of the entirety of this Complaint with the same force and affect, as if fully set forth herein again at length.
- 108. Defendants acted negligently, to the extent of being reckless, which was either ordinary negligence or negligence per se as violating standing regulations.
- 109. Defendant Officers in concert with their superiors and agents attacked the Plaintiffs with dangerous chemical munitions, essentially chemical weapons which Plaintiffs believe are banned in the international rules of war but do not make that point a necessary part of their claim, such as so-called OC gas and CS gas or tear gas.
- 110. Defendants directly or by supervision and direction caused the Plaintiffs to be surrounded, attacked, and forced to breath these dangerous gasses in violation of the manufacturers' warnings, limitations on use, and directions, in violation of the laws governing law enforcement officers on Federal ground at the U.S. Capitol and officers of the Metropolitan Police Department of the District of Columbia.
- 111. Among other mis-uses of these gases, D.C. law mandates that three (3) warnings be given prior to the use of such measures referred to as less than lethal weapons or for crowd control, but more to the point the law in the District of Columbia requires careful attention of police officers to whether or not members of a crowd have a pathway to leave the area and disperse.
  - 112. The law does not allow the use of measures to punish demonstrators for being

where they are or to cause them to leave *if they have no way to leave*.

- 113. Any justification for use of force or chemicals vanishes if the purpose of compelling a crowd to leave is an impossibility because there is no way for them to leave.
- 114. As massive crowds of people congregated on Capitol Hill, those who had arrived early were crushed by the growing crowd "behind" them (that is on the other side of the crowd from the Capitol and from police lines).
- 115. Crowds were instructed to move forward (closer to the Capitol) by Suspicious Actors / Agent Provocateurs, including a key figure known to the U.S. Government but concealed from the public given the code name Northwest Scaffold Commander<sup>5</sup> who repeatedly urged the crowds to move up closer to the Capitol in a manner that sounded convincing that he was a leader and that his urgings were the plan.
- 116. As a result the crowds nearest to police lines, nearest to the Capitol building, were being pushed and shoved as if with a snow plow into the police lines and toward the Capitol.
- 117. The crowds could not retreat after being beaten by the police because the crowds "behind" them were too thick and growing by the minute.
- 118. Therefore, the Defendants violated D.C. Law by using violence and chemical munitions under the guise of encouraging the crowds to disperse even though the crowds could

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https://jan6attack.com/individuals/nwscaffoldcommander/index.htm His face is clearly visible, and yet the Government pretends not to know the identity of this crucial Agent Provocateur, even though anyone with a driver's license (ever), college or high school photographic ID card (ever), or in most cases social media accounts has a photograph that the FBI can find. Indeed, the U.S. Department of Justice has regularly used the same technology used by "2000 Mules" by Dnesh D'Souza, Greg Phillips, and Catherine Engelbrecht which proved that the 2020 election was stolen by pinpointing the location of a person's cell phone. Northwest Scaffolding Commander's unique position over a very long period of time would allow the FBI to geo-locate his smart phone and identify him. The DOJ has regularly prosecuted January 6 Defendants including by validating the technology used in "2000 Mules."

not disperse.

- 119. That is an explicit violation of D.C. Law.
- 120. No justification can exist to use violence to compel people to leave who are unable to leave the area.
- 121. That is, the police officers under these circumstances would have been required to stand their ground, which was happening peacefully in a stable set of lines as shown on video, and wait for the National Guard or other officers to approach the outer edge of the crowd and advise them that, no, the Capitol Grounds normally open to the public were not open on that day, turn them away, and if necessary arrest those who did not comply. At the outer edges of the crowds, warnings to depart could have been followed without conflict.
- 122. Officers should have if they had any legitimate reason to clear the national park known as the Capitol Grounds cleared the area from the farthest edge first and then progressively up towards the Capitol building because the law compels them to ensure that people have a way of leaving, a pathway out, before resorting to violence and chemical weapons.
- 123. As shown especially well on recently released video recordings not previously available, these things occurred at the initiative of the Defendants, not in reaction to any acts of the Plaintiffs.
- 124. The Defendants were especially reckless as shown on previously known but especially on recently-released video in firing gas canisters into the wind, so that the gas blew back on the police officers on the terrace the next level above the crowd.
- 125. The officers and their leaders then lied to the American people, to Congress, the media, and the Courts by saying that "officers were gassed" without honestly explaining that the officers gassed themselves.

- 126. Perhaps they were banking on the videos never being revealed. Or perhaps they made those statements out of long habit.
- 127. Overcome by their own gas, the officers then abandoned their positions completely as shown on video exclusively because of firing gas on their own positions while demonstrators were very far away on the next level lower.
- 128. Inside the Capitol building, videos currently available only to defense attorneys shows huge billows of smoke even though the manufacturer's instructions and the officer's training demands that the gas cannot be used in enclosed spaces for many reasons.
- 129. All Defendants acted in concert to unlawfully institute, conduct and continue physical battery and physical abuse of the Plaintiffs as pled in detail herein.
- 130. The Defendants engaged in the conduct described by this Complaint willfully, deliberately, maliciously, in bad faith, and in reckless disregard of Plaintiffs federally protected constitutional rights.

#### **THIRD CAUSE OF ACTION**

Bivens v. VI Unknown Named Agents of Federal Bureau of Narcotics, 403 U.S. 388 (1971) Violation of Fourth, Fifth, Fourteenth Amendment and Due Process Rights

- 131. Plaintiffs repeat and re-allege all of the previous allegations of the entirety of this Complaint with the same force and affect, as if fully set forth herein again at length.
  - 132. 42 U.S.C. § 1983 provides in pertinent part that:

Every person, who under color of any statute, ordinance, regulation, custom or usage of any state or territory or the District of Columbia subjects or causes to be subjected any citizen of the United States or other person within the jurisdiction thereof to the deprivation of any rights, privileges or immunities secured by the constitution and law shall be liable to the party injured in an action at law, suit in equity, or other appropriate proceeding for redress . . .

- 133. At the time of the events complained herein, Plaintiffs possessed the clearly established constitutional right to be free from physical violence, physical abuse, terrorizing, intimidation, fright from assault, and false imprisonment or kidnapping violating the right of liberty and travel, excessive force, and the like.
- 134. The Defendants were at all times relevant to this Complaint acting on duty within the terms of their employment and assignment, and not on a "frolic" or detour from their employment and assigned duties, but abusing their positions and offices in violation of the Plaintiffs' rights.
- 135. The Defendants formed a retaliatory motive and beat the Plaintiffs because they were exercising their First Amendment rights demonstrating at the U.S. Capitol.
- 136. The Defendants, acting in concert jointly and severally, possessed a retaliatory motive.
- 137. The violations of Plaintiffs' liberty interest and freedom from bodily injury by the Defendants are compensable under *Bivens v. VI Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971).

#### **FOURTH CAUSE OF ACTION**

Civil Action for Deprivation of Rights

Against All Named Defendants

42 U.S.C. § 1983 – Excessive Force in Violation of Fourth Amendment

- 138. Plaintiffs repeat and re-allege all of the previous allegations of the entirety of this Complaint with the same force and affect, as if fully set forth herein again at length.
- 139. At the time of the events complained herein, Plaintiffs possessed the clearly established constitutional right to be free from physical violence, physical abuse, terrorizing, intimidation, fright from assault, and false imprisonment or kidnapping violating the right of liberty and travel, excessive force, and the like.

- 140. The Defendants were at all times relevant to this Complaint acting under color of state law, on duty within the terms of their employment and assignment, and not on a lark or detour from their employment and assigned duties, but abusing their positions and offices in violation of the Plaintiffs' rights.
- 141. All Defendants acted in concert to unlawfully institute, conduct and continue physical battery and physical abuse of the Plaintiffs as pled in detail herein.
  - 142. 42 U.S.C. § 1983 provides in pertinent part that:

Every person, who under color of any statute, ordinance, regulation, custom or usage of any state or territory or the District of Columbia subjects or causes to be subjected any citizen of the United States or other person within the jurisdiction thereof to the deprivation of any rights, privileges or immunities secured by the constitution and law shall be liable to the party injured in an action at law, suit in equity, or other appropriate proceeding for redress . . .

- 143. The Defendants did so with shocking and willful indifference to Plaintiffs rights, and in doing so exhibited conscious awareness that they would cause Plaintiffs severe physical and emotional injuries or even death.
  - 144. These Defendants acted in concert and jointly in a conspiracy with each other.
- 145. The acts of omissions of the Defendants as described herein intentionally deprived Plaintiffs of their constitutional rights and caused them other damages.
- 146. The Defendants to this claim at all times relevant hereto were acting as part of a conspiracy, in concert, jointly and severally, pursuant to municipal/county custom, policy, decision, ordinance, regulation, widespread habit, usage, or practice in their actions pertaining to Plaintiffs.

#### FIFTH CAUSE OF ACTION

Civil Action for Deprivation of Rights
Against All Named Defendants
42 U.S.C. § 1983 – Violation of the Fifth Amendment

- 147. Plaintiffs repeat and re-allege all of the previous allegations of the entirety of this Complaint with the same force and effect, as if fully set forth herein again at length.
- 148. At the time of the events complained herein, Plaintiffs possessed the clearly established constitutional right to be free from physical violence, physical abuse, terrorizing, intimidation, fright from assault, and false imprisonment or kidnapping violating the right of liberty and travel, excessive force, and the like.
- 149. At the time of the events complained herein, Plaintiffs possessed the clearly established constitutional right to be free from physical violence, physical abuse, terrorizing, intimidation, fright from assault, and false imprisonment or kidnapping violating the right of liberty and travel, excessive force, and the like.
- 150. The Defendants were at all times relevant to this Complaint acting on duty within the terms of their employment and assignment, and not on a "frolic" or detour from their employment and assigned duties, but abusing their positions and offices in violation of the Plaintiffs' rights.
- 151. Any reasonable person knew or should have known of these rights at the time of the complained of conduct insofar as they were clearly established at that time; especially to the Defendants as sworn law enforcement officers.
- 152. All Defendants acted in concert to unlawfully institute, conduct and continue physical battery and physical abuse of the Plaintiffs as pled in detail herein.
- 153. The Defendants engaged in the conduct described by this Complaint willfully, deliberately, maliciously, in bad faith, and in reckless disregard of Plaintiffs federally protected constitutional rights.

### **SIXTH CAUSE OF ACTION**

## Civil Action for Deprivation of Rights Against All Named Defendants

42 U.S.C. § 1983 – Deliberately Indifferent Policies, Practices, Customs, Training, and Supervision in Violation of the Fourteenth, and First Amendments and in Violation of 42 U.S.C. § 1981

- 154. Plaintiffs repeat and re-allege all of the previous allegations of the entirety of this Complaint with the same force and effect, as if fully set forth herein again at length.
- 155. Plaintiffs possessed the following clearly established rights, guaranteed to them by the Constitution of the United States, at the time of the conduct complained herein:
- 156. The right to bodily integrity and to be free from excessive force by law enforcement under the Fourth Amendment, Fourteenth Amendment; Fifth Amendment and Due Process requirements of the U.S. Constitution.
  - 157. The right to be free from malicious prosecution under the Fourteenth Amendment.
- 158. The Defendants knew or should have known of these rights at the time of the complained conduct insofar as they were clearly established at that time, especially to Defendants as sworn law enforcement officers.
- 159. The acts or omissions of these Defendants, as described herein, deprived Plaintiffs of her constitutional and statutory rights and caused them other damages.
- 160. The Defendants are not entitled to any immunity for the conduct complained herein.
- 161. The Defendants developed and maintained policies, procedures, customs, and/or practices exhibiting deliberate and willful indifference to the constitutional rights of citizens, which were moving forces behind and proximately caused the violations of Plaintiffs constitutional and federal rights as set forth herein, and in the other claims, which resulted from a conscious and deliberate choice to follow a course of action from among various alternative

courses of conduct available.

- 162. The Defendants, each and every one of them, acting in concert, jointly and severally, created and have unlawfully tolerated an atmosphere of lawlessness, and have developed and maintained long-standing, department-wide customs, law enforcement related policies, procedures, customs, and practices, and/or failed to properly train and/or supervise its officers in a manner amounting to deliberate indifference to the constitutional rights of Plaintiffs and of the public generally.
- 163. All Defendants acted in concert as part of the conspiracy to deprive Plaintiffs of her civil and constitutional rights.

### <u>SEVENTH CAUSE OF ACTION</u> Excessive Force by Officers John Does 1 to 100

- 164. Plaintiffs repeat and re-allege all of the previous allegations of the entirety of this Complaint with the same force and effect, as if fully set forth herein again at length.
- 165. The Defendants present on the scene committed excessive force prohibited underD.C. law with regard to the permissible conduct of law enforcement.

#### **EIGHTH CAUSE OF ACTION**

### Intentional Infliction of Emotional Distress by Officers John Does 1 to 100

- 166. Plaintiffs repeat and re-allege all of the previous allegations of the entirety of this Complaint with the same force and effect, as if fully set forth herein again at length.
- 167. The Defendants on the scene and other Defendants through their orders and instructions and misinformation intentionally, knowingly, and deliberately subjected the Plaintiffs to emotional distress.
- 168. Recordings of radio conversations among law enforcement officers, provided to January 6 Defendants at least in part as required under *Brady v. Maryland*, show key leaders of

the USCP and MPD and key officers on site like Thau and Glover lying over the air to officers to knowingly and intentionally whip law enforcement officers into a frenzy, panic, and/or hysteria to generate violence against otherwise peaceful demonstrators.

- 169. For example, leaders of the USCP and MPD broadcast over the police radio in hysterical tones "SHOTS FIRED!" without informing the officers that it was a USCP police officer who fired his service weapon against Ashli Babbit, without warning as shown in video recordings, and without any justification since Ashli Babbit was clearly unarmed (using both hands to hold on to both sides of an empty window frame).
- 170. Both in tone and content, key leaders led officers facing demonstrators to believe that the demonstrators were shooting at police officers the opposite of the truth provoking a violent response by law enforcement officers on January 6, 2021, which was in fact unjustified and unlawful.
- 171. Those Defendants responsible for inciting law enforcement officers into committing violence against January 6 Demonstrators on Capitol Hill clearly knew that they were lying and clearly intended to provoke violence that day.
- 172. Tracking the radio messages against the video recordings of actual events, it becomes clear that leaders among police officers "led" the events by several minutes reporting circumstances and events to all officers *that had not yet occurred* so as to cause the violence, not report on it.
- 173. One of the Defendants is seen on video recordings giving no warnings before using dangerous but misnamed "less than lethal weapons" but then reporting over the police radio that he had given warnings. The video recordings show that that was a lie. He repeated that lie on several different occasions.

- 174. Therefore, Defendants' conduct was not accidental but intentional.
- 175. Plaintiffs allege that the evidence will show that the officers intentionally sought to cause harm, terror, fear, and distress to previously-peaceful demonstrators out of a misguided desire to terrorize demonstrators into leaving.

### NINTH CAUSE OF ACTION

### Negligent Infliction of Emotional Distress by Officers John Does 1 to 100

- 176. Plaintiffs repeat and re-allege all of the previous allegations of the entirety of this Complaint with the same force and effect, as if fully set forth herein again at length.
- 177. Plaintiffs repeat and re-allege all of the previous allegations of the EIGHTH Cause of Action with the same force and effect, as if fully set forth herein again at length.
- 178. The Defendants on the scene and those other Defendants through their orders and instructions negligently subjected the Plaintiffs to emotional distress.
- 179. If the allegations of the Eighth Cause of Action as proven rise only to the level of negligence rather than intention, Plaintiffs claim relief under Negligence Infliction of Emotional Distress.

### RESPONDEAT SUPERIOR LIABILTY AS TO ALL COUNTS

- 180. For all Causes of action stated, Defendant District of Columbia and/or the U.S. Capitol Police are jointly and severally liable under the doctrine of *respondeat superior* for the aforementioned tortious acts and omissions of officers and their supervisors and agencies.
- 181. Defendant District of Columbia is jointly and severally liable under the doctrine of *respondeat superior* for the aforementioned tortious acts and omissions of officers

and their supervisors and agencies.

182. Defendants U.S. Capitol Police, the United States of America, and the Federal Bureau of Investigation are jointly and severally liable under the doctrine of *respondeat* superior for the aforementioned tortious acts and omissions of officers and their supervisors and agencies.

#### VI. PRAYER FOR RELIEF

As a proximate result of the Defendants' unlawful conduct, Plaintiffs has suffered actual and physical and emotional injuries, and other damages and losses entitling them to compensatory and special damages, in amounts to be determined at trial.

WHEREFORE, Plaintiffs pray for relief and judgment against each of the Defendants, jointly and severally, as follows: general damages, special damages, punitive damages, prejudgment and post-judgment interest as allowed by law, costs of suit incurred herein, in an aggregate amount of \$250,000.00 per Plaintiff and up to \$1,250,000 punitive, pain and suffering, emotional, so called in the law psychic injuries, reduced enjoyment of life and freedom to engage in normal life due to such lingering effects as Post-Traumatic Stress Disorder, and exemplary damages, as may be proven at trial, attorneys' fees, costs, and any other further relief the Court deems just and proper, for the illegal, unconstitutional and intentional and malicious acts of the Defendants, each and every one of them, against the Plaintiffs. Plaintiffs also request injunctive relief for improved training and supervision.

#### **DEMAND FOR JURY TRIAL**

Plaintiffs demand a trial by jury on all counts as to all issues so triable.

Dated: January 30, 2024

### RESPECTFULLY SUBMITTED,

PLAINTIFFS, Pro Se

EDWARD JACOB LANG, Pro Se

ALAINA TROCANO, Pro Se

ALBUQUERQUE HEAD, Pro Se

ANGELA HARRELSON, Pro Se

BARTON SHIVELY, Pro Se

BRITANY PERKINS, Pro Se

CHRISTOPHER ALBERTS, Pro Se

CINDY LOU YOUNG, Pro Se

COUY GRIFFIN, Pro Se

DANIEL MICHAEL MORRISSEY, Pro Se

DAVID JUDD, Pro Se

DAVID VALENTINE, Pro Se

DEREK KINNISON, Pro Se

DONALD CHILCOAT, Pro Se

DONALD HAZARD, Pro Se

DOUGLAS A SWEET, Pro Se

ELIAS COSTIANES, Pro Se

ERIC CLARK, Pro Se

ERIK SCOTT WARNE, Pro Se

ERNIE MARTINEZ, Pro Se

GABRIEL GARCIA, Pro Se

GEORGE TANIOS, Pro Se

GILBERT FONTICOBA, Pro Se

GINA BISIGNANO, Pro Se

HECTOR VARGAS, Pro Se

HENRY MUNTZER, Pro Se

ISAAC STEVE STURGEON, Pro Se

ISAAC THOMAS, Pro Se

JALISE MIDDLETON, Pro Se

JAMES BEEKS, Pro Se

JAMES BRETT, Pro Se

JAMES MCGREW, Pro Se

JARED LANE WISE, Pro Se

JEFFREY SHANE WITCHER, Pro Se

JENNI HEINL, Pro Se

JEREMY SORVISTO, Pro Se

JESSE RUMSON, Pro Se

JESSE WATSON, Pro Se

JOSHUA DOOLIN, Pro Se

K. NICOLE WILSON, Pro Se

KENNETH T HARRELSON, Pro Se

LEWIS WAYNE SNOOTS, Pro Se

LUKE COFFEE, Pro Se

MARC KAPLAN, Pro Se

MARK MIDDLETON, Pro Se

MICHAEL D ENNIS, Pro Se

MICHAEL ECKERMAN, Pro Se

MICHAEL THOMAS CURZIO, Pro Se

MICHELLE HELMINEN, Pro Se

NANCY ELOISE SINGLETARY, Pro Se

NATHAN DEGRAVE, Pro Se

PETER HARDING, Pro Se

PETER STAGER, Pro Se

RACHEL MYERS, Pro Se

RACHEL POWELL, Pro Se

RALLY RUNNER, Pro Se

ROBERT DEGREGORIS, Pro Se

ROBERT NORWOOD, Pro Se

RONALD PALENTCHAR, Pro Se

RONALD SANDLIN, Pro Se

SCOTT FAIRLAMB, Pro Se

SEAN DAVID WATSON, Pro Se

SEAN HENRY, Pro Se

SEAN MCHUGH, Pro Se

SHAWNDALE CHILCOA, Pro Se

SUZAN MCCLAIN, Pro Se

SUZANNE IANNI, Pro Se

TANLUI LP, Pro Se

TRACI SUNSTRUM, Pro Se

TREVOR BROWN, Pro Se

TRICIA LACOUNT, Pro Se

TUCKER WESTON, Pro Se

TYLER TEW, Pro Se

WILLAM F BEALS II, Pro Se

ZACHARY JORDAN ALAM, Pro Se

ZACHARY REHL, Pro Se

While seeking an attorney, All c/o JAKE LANG Post Office Box 485 Narrowsburg, NY 12764 Telephone: (602) 561-8202

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

1

EDWARD JACOB LANG Post Office Box 485 Narrowsburg, NY 12764	Civil Action No.
Et al. Plaintiffs,	
V.	
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001	
Et al.  Defendants.	

- Dominic Pezzola 1. make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries pro se without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- 3. However, I join the common Complaint to meet the expected statute of limitations deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- 4. I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

5. I am suing because some members of the Washington, D.C. Metropolitan Police
Department and a very few members of the U.S. Capitol Police Department initiated excessive
use of force and violence, and I and others were injured psychologically, physically, or
chemically by the Defendants and not as part of actions initiated by the Plaintiff.

Dated: January 8, 2024

Respectfully submitted,

DocuSigned by:

-08CDA8509F76412...

[If applicable]
By Power of Attorney:

-DocuSigned by:

----08CDA8509F76412...

De-Penela

January 8th, 2024

Alaina Trocano
alaina.trocano@amail.com

### DECLARATION Statement of Facts

I, Alaina Trocano, am stating the following facts:

- · I am a citizen of the United States and currently reside in the state of Florida.
- · I have a medical history of an autoimmune disease; rheumatoid arthritis.
- I was diagnosed with PTSD after January 6th, 2021.
- · I am a flight attendant for a major airline.
- · My previous work history includes being a paramedic.
- · I have never been arrested.
- I traveled to Washington D.C. to support the sitting president, Donald J. Trump and to hear what he had to say.
- Prior to January 6th 2021, I had the knowledge that protest permits were granted, thus
  protecting my first amendment rights.
- I saw no barricades, signage or fencing on or around Capitol grounds.
- I saw no EMS except for an unmanned bus marked only with 'MASS CASUALTY INCIDENT' on my way back to the hotel.
- I did not hear or receive any announcements or warnings regarding trespassing, dispersing or leaving Capitol grounds.
- · I did not receive any information on if the streets were safe.
- · I heard loud bangs and could smell sulfur.
- I was fearful of a stampede or similar danger with no where safe to go and equally as fearful
  of the journey back through the crowd and the journey to my hotel, especially with the
  inability to run or defend myself due to my rheumatoid arthritis.
- I was visited by the FBI and cleared of any and all wrongdoing within minutes.
- I have suffered immensely because of this day. I have lost relationships, had to take time off of work, I am constantly afraid, I suffer from nightmares, brain fog and I have had to defend myself from coworkers and my airline by filing a lawsuit.

I am not an expert in law however, I do know right from wrong. I hereby and herein reserve the right to amend and make amendments to this document as necessary, in order that the truth may be ascertained, and proceedings justly determined.

My autograph verifies that I Alaina Trocano, a woman, have personal knowledge of the facts that all herein be true.

In Liberty,

Alaina Trocano

Without Préjudice

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

Civil Action No.

- 1. I \_\_\_\_\_\_make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries *pro se* without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- 3. However, I join the common Complaint to meet the expected statute of limitations deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- 4. I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

5. I am suing because some members of the Washington, D.C. Metropolitan Police
Department and a very few members of the U.S. Capitol Police Department initiated excessive
use of force and violence, and I and others were injured psychologically, physically, or
chemically by the Defendants and not as part of actions initiated by the Plaintiff.

Dated: January 8, 2024

Respectfully submitted.

CASA ERRECARDA CARD

[If applicable]
By Power of Attorney:

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

EDWARD JACOB LANG Post Office Box 485 Narrowsburg, NY 12764	Civil Action No.
Et al. Plaintiffs,	
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001	
Et al.  Defendants.	

- 1. I \_\_\_\_\_make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
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Department and a very few members of the U.S. Capitol Police Department initiated excessive
use of force and violence, and I and others were injured psychologically, physically, or
chemically by the Defendants and not as part of actions initiated by the Plaintiff.

Dated: January 8, 2024

Respectfully submitted,

BOUTM PLY

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[If applicable]
By Power of Attorney:

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

1

Post Office Box 485 Narrowsburg, NY 12764	Civil Action No.
Et al. Plaintiffs,	· · · · · · · · · · · · · · · · · · ·
$\mathbf{V}_{c}$	
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001	
Et al.  Defendants.	

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- 2. I am suing for my own physical injuries and/or chemical gas injuries *pro se* without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- 3. However, I join the common Complaint to meet the expected statute of limitations deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- 4. I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

DocuSign Envelope ID: 2A7F7FF8-C156-4DE4-AAA0-738205003E1F

5. I am suing because some members of the Washington, D.C. Metropolitan Police
Department and a very few members of the U.S. Capitol Police Department initiated excessive
use of force and violence, and I and others were injured psychologically, physically, or
chemically by the Defendants and not as part of actions initiated by the Plaintiff.

Dated: January 8, 2024

Respectfully submitted,

Docusigned by:

Augul K Harrelson

DATECTOCFE884DB.

[If applicable]
By Power of Attorney:

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

EDWARD JACOB LANG Post Office Box 485 Narrowsburg, NY 12764		Civil Action No.
Et al.	Plaintiffs,	
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001		
Et al.	efendants.	

- 1. I \_\_\_\_\_ make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries *pro se* without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- 3. However, I join the common Complaint to meet the expected statute of limitations deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- 4. I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

5. I am suing because some members of the Washington, D.C. Metropolitan Police
Department and a very few members of the U.S. Capitol Police Department initiated excessive
use of force and violence, and I and others were injured psychologically, physically, or
chemically by the Defendants and-not as part of actions initiated by the Plaintiff.

Dated: January 8, 2024

Respectfully submitted,

[If applicable]

By Power of Attorney:

Shappe

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

EDWARD JACOB LANG Post Office Box 485 Narrowsburg, NY 12764	Civil Action No.
Et al. Plaintiffs,	.=
Tanuns,	
V×	
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001	
Et al.	
Defendants.	

- 1. I \_\_\_\_\_\_ make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries *pro se* without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- 3. However, I join the common Complaint to meet the expected statute of limitations deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- 4. I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

5. I am suing because some members of the Washington, D.C. Metropolitan Police
Department and a very few members of the U.S. Capitol Police Department initiated excessive
use of force and violence, and I and others were injured psychologically, physically, or
chemically by the Defendants and not as part of actions initiated by the Plaintiff.

Dated: January 8, 2024

Respectfully submitted,

-DocuSigned by:

-019F7DC85F9A46E

[If applicable]

By Power of Attorney:

INDIVIDUAL SIGNATURES

CINDY LOU YOUNG, Pro S

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

ı

EDWARD JACOB LANG Post Office Box 485 Narrowsburg, NY 12764		Civil Action No.
Et al.	Plaintiffs,	
V-		
SARGEANT DANIEL THAU, Metropolitan Police Departmen 441 4th Street, NW, 7th Floor Washington, DC 20001		
Et al.	Defendants.	

- Christopher Alberts \_\_\_\_\_ make my claim as an additional Plaintiff against 1. the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- I am suing for my own physical injuries and/or chemical gas injuries pro se without a 2. lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- However, I join the common Complaint to meet the expected statute of limitations 3. deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- I understand that I can hire an attorney to pursue my claims and my lawyer may be able 4. to amend my own individual Complaint.

5. I am suing because some members of the Washington, D.C. Metropolitan Police
Department and a very few members of the U.S. Capitol Police Department initiated excessive
use of force and violence, and I and others were injured psychologically, physically, or
chemically by the Defendants and not as part of actions initiated by the Plaintiff.

Dated: January 8, 2024

Respectfully submitted,

CALLS BY MA POA

[If applicable]
By Power of Attorney:

Docusigned by:

CALLY- by ASA P OA

GEBF926B5B05486...

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

EDWARD JACOB LANG Post Office Box 485 Narrowsburg, NY 12764	Civil Action No.
Et al. Plaintiffs,	
v.	
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001	
Et al.  Defendants.	
ADDITIONAL PLAINTIFF JOINING IN TH	HE COMPLAINT
1. I couy Griffin make my claim as	s an additional Plaintiff against
the Defendants as alleged in the Complaint, by joining in the al	legations and claims and demands
for relief of the common Complaint.	
2. I am suing for my own physical injuries and/or chemica	I gas injuries pro se without a
lawyer, and I do not speak for or represent any of the other Plai	ntiffs, and none of the other
Plaintiffs speak for me.	
3. However, I join the common Complaint to meet the exp	ected statute of limitations
deadline and because filing individual Complaints that are near	ly the same would not be efficient
and would be confusing and unnecessary extra work.	
4. I understand that I can hire an attorney to pursue my cla	ims and my lawyer may be able

to amend my own individual Complaint.

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5. I am suing because some members of the Washington, D.C. Metropolitan Police
Department and a very few members of the U.S. Capitol Police Department initiated excessive
use of force and violence, and I and others were injured psychologically, physically, or
chemically by the Defendants and not as part of actions initiated by the Plaintiff.

Dated: January 8, 2024

Respectfully submitted,

12-806

[If applicable]

By Power of Attorney:

EDWARD IACOD I ANG

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

ı

Post Office Box 485 Narrowsburg, NY 12764		Civil Action No.
Et al.	Plaintiffs,	
$\mathbf{v}_{\cdot}$		
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001		
Et al.	Defendants.	

- 1. I Daniel Michael Morrissey make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries *pro se* without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- 3. However, I join the common Complaint to meet the expected statute of limitations deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- 4. I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

DocuSign Envelope ID: 5FE13FCD-7FD7-4E77-9C09-C35BCE31D1F6

5. I am suing because some members of the Washington, D.C. Metropolitan Police
Department and a very few members of the U.S. Capitol Police Department initiated excessive
use of force and violence, and I and others were injured psychologically, physically, or
chemically by the Defendants and not as part of actions initiated by the Plaintiff.

Dated: January 8, 2024

Respectfully submitted,

DocuSigned by:

[If applicable]

By Power of Attorney:

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

Civil Action No.

- 2. I am suing for my own physical injuries and/or chemical gas injuries *pro se* without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- 3. However, I join the common Complaint to meet the expected statute of limitations deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- 4. I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

DocuSign Envelope ID: 90CD8D85-DE15-43FE-ADFC-00D172EE6196

5. I am suing because some members of the Washington, D.C. Metropolitan Police
Department and a very few members of the U.S. Capitol Police Department initiated excessive
use of force and violence, and I and others were injured psychologically, physically, or
chemically by the Defendants and not as part of actions initiated by the Plaintiff.

Dated: January 8, 2024

Respectfully submitted,

Enry kell

[If applicable]
By Power of Attorney:

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

T

EDWARD JACOB LANG Post Office Box 485 Narrowsburg, NY 12764	Civil Action No.
Et al. Plaintiffs,	,
V.	
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001	
Et al. Defendants.	=

- David Valentine \_ make my claim as an additional Plaintiff against 1. the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- I am suing for my own physical injuries and/or chemical gas injuries pro se without a 2. lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- However, I join the common Complaint to meet the expected statute of limitations 3. deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- I understand that I can hire an attorney to pursue my claims and my lawyer may be able 4. to amend my own individual Complaint.

DocuSign Envelope ID: F0642DE7-4930-4469-9E9E-E733778E80CB

5. I am suing because some members of the Washington, D.C. Metropolitan Police
Department and a very few members of the U.S. Capitol Police Department initiated excessive
use of force and violence, and I and others were injured psychologically, physically, or
chemically by the Defendants and not as part of actions initiated by the Plaintiff.

Dated: January 8, 2024

Respectfully submitted,

[If applicable]

—pocusigned by:

12 w/ Lots

By Power of Attorney:

-DocuSigned by:

Druntalota -4AAFB3CB6D2A4EB... CDWARD IACODIANO

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

Post Office Box 48 Narrowsburg, NY	35	Civil Action No.
Et al.	Plaintiffs,	
SARGEANT DAN Metropolitan Police 441 4th Street, NV Washington, DC 2	ce Department V, 7th Floor	
Et al.	Defendants.	

- 1. I \_\_\_\_\_\_ make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries *pro se* without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- 3. However, I join the common Complaint to meet the expected statute of limitations deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- 4. I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

5. I am suing because some members of the Washington, D.C. Metropolitan Police
Department and a very few members of the U.S. Capitol Police Department initiated excessive
use of force and violence, and I and others were injured psychologically, physically, or
chemically by the Defendants and not as part of actions initiated by the Plaintiff.

Dated: January 8, 2024

Respectfully submitted,

DocuSigned by:

-7AB13F7183B4478.

[If applicable]

By Power of Attorney:

EDWARD JACOB LANG Post Office Box 485 Narrowsburg, NY 12764	Civil Action No.
Et al. Plaintiffs,	
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001	
Et al. Defendants.	

- 1. I \_\_\_\_\_\_ make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries *pro se* without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- 3. However, I join the common Complaint to meet the expected statute of limitations deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

Dated: January 8, 2024

Respectfully submitted,

[If applicable]

By Power of Attorney:

EDWARD JACOB LANG Post Office Box 485 Narrowsburg, NY 12764		Civil Action No.
Et al.	Plaintiffs,	,
V.		
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001		
Et al.	efendants.	
ADDITIONAL PLAINTIFF JOINING IN THE COMPLAINT		

- 1. I \_\_\_\_\_\_ make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries *pro se* without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- 3. However, I join the common Complaint to meet the expected statute of limitations deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- 4. I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

Dated: January 8, 2024

Respectfully submitted,

Donald Hazard

-41D5A1CDCF62412...

[If applicable]
By Power of Attorney:

- DocuSigned by:

Donald Hazard

Post Office Box 485 Narrowsburg, NY 12764	Civil Action No.
Et al. Plaintiffs,	-
V.	
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001	
Et al.  Defendants.	

- 1. I \_\_\_\_\_\_make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries *pro se* without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- 3. However, I join the common Complaint to meet the expected statute of limitations deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- 4. I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

Dated: January 8, 2024

Respectfully submitted,

DocuSigned by:

0-2-3-1
710000510F9042D...

[If applicable]
By Power of Attorney:

DocuSigned by:

DocuSigned by:

7183DC51CF9342D...

Case 1:24-cv-00295-DLF Document 5 Filed 02/06/24 Page 79 of 236

INDIVIDUAL SIGNATURES

ERIC CLARK, Pro Se

Post Office Box 485 Narrowsburg, NY 12764				Civil Action	No.
Et al.	Plaintiffs,		_		
V.					
SARGEANT DANIEL THA Metropolitan Police Departm 441 4th Street, NW, 7th Floor Washington, DC 20001	ent				
Et al.	Defendants.	٥			

- 1. I make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries *pro se* without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- 3. However, I join the common Complaint to meet the expected statute of limitations deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- 4. I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

### Case 1:24-cv-00295-DLF Document 5 Filed 02/06/24 Page 82 of 236

DocuSign Envelope ID: AE434711-CDD0-42E3-841E-019B5D71FCD6

5. I am suing because some members of the Washington, D.C. Metropolitan Police
Department and a very few members of the U.S. Capitol Police Department initiated excessive
use of force and violence, and I and others were injured psychologically, physically, or
chemically by the Defendants and not as part of actions initiated by the Plaintiff.

Dated: January 8, 2024

Respectfully submitted,

Docusigned by:
Edward Jacob Lang

[If applicable]

By Power of Attorney:

Edward Jacob Lang

EDWARD JACOB LANG Post Office Box 485 Narrowsburg, NY 12764		Civil Action No.
Et al.	Plaintiffs,	1-
ν.		
SARGEANT DANIEL THAU, Metropolitan Police Departmen 441 4th Street, NW, 7th Floor Washington, DC 20001		
Et al.	Defendants.	
ADDITIONAL	PLAINTIFF JOINING IN TH	IE COMPLAINT
1. I	make my claim as	an additional Plaintiff against
the Defendants as alleged in the	e Complaint, by joining in the all	egations and claims and demands
for relief of the common Comp	laint.	
2. I am suing for my own	physical injuries and/or chemical	l gas injuries pro se without a
lawyer, and I do not speak for o	or represent any of the other Plain	ntiffs, and none of the other
Plaintiffs speak for me.		
3. However, I join the con	nmon Complaint to meet the exp	ected statute of limitations
deadline and because filing ind	ividual Complaints that are nearl	y the same would not be efficient
and would be confusing and un	necessary extra work.	
4. I understand that I can I	nire an attorney to pursue my cla	ims and my lawyer may be able
to amend my own individual C	omplaint.	

Dated: January 8, 2024

Respectfully submitted,

[If applicable]

By Power of Attorney:

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Post Office Box 485 Narrowsburg, NY 12764	Civil Action No.
Et al. Plaintiffs,	AC
V.	
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001	
Et al.  Defendants.	

- 1. I \_\_\_\_\_ make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries *pro se* without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- 3. However, I join the common Complaint to meet the expected statute of limitations deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- 4. I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

DocuSign Envelope ID: D7FE22DB-8807-4CE7-B92A-BB69FDA85361

5. I am suing because some members of the Washington, D.C. Metropolitan Police
Department and a very few members of the U.S. Capitol Police Department initiated excessive
use of force and violence, and I and others were injured psychologically, physically, or
chemically by the Defendants and not as part of actions initiated by the Plaintiff.

Dated: January 8, 2024

Respectfully submitted,

Docusigned by:

Elias Costianus

—18A488CC457A4E7...

[If applicable]
By Power of Attorney:

EDWARD JACOB LANG Post Office Box 485 Narrowsburg, NY 12764	Civil Action No.
Et al. Plaintiffs,	
v.	
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001	
Et al.  Defendants.	

- 1. I ERNESTO MARNUEZ JR. make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries *pro se* without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- 3. However, I join the common Complaint to meet the expected statute of limitations deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- 4. I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

Dated: January 8, 2024

Respectfully submitted,

[If applicable]

By Power of Attorney:

Civil Action No.

<b>EDWARD JACOB LANG</b>
Post Office Box 485
Narrowsburg, NY 12764

Et al.

Plaintiffs,

V.

SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001

Et al.

Defendants.

- 1. I <u>Coco e Pierre Iorias</u> make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries *pro se* without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- 3. However, I join the common Complaint to meet the expected statute of limitations deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- 4. I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

Dated: January 8, 2024

Respectfully submitted,

[If applicable]

By Power of Attorney:

EDWARD JACOB LANG Post Office Box 485		Civil Action No.
Narrowsburg, NY 12764		Civil Action ivo.
Et al.	Plaintiffs,	4
V×		
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001		
Et al.	Defendants.	
ADDITIONAL I	PLAINTIFF JOINING IN TI	HE COMPLAINT s an additional Plaintiff against

- the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries *pro se* without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- 3. However, I join the common Complaint to meet the expected statute of limitations deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- 4. I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

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5. I am suing because some members of the Washington, D.C. Metropolitan Police
Department and a very few members of the U.S. Capitol Police Department initiated excessive
use of force and violence, and I and others were injured psychologically, physically, or
chemically by the Defendants and not as part of actions initiated by the Plaintiff.

Dated: January 8, 2024

Respectfully submitted,

Ernie Martinez

[If applicable] By Power of Attorney:

DocuSigned by:

Ernie Martinez

60ABCAE76767412

Civil Action No.
3

- 1. I \_\_\_\_\_ make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries *pro se* without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- 3. However, I join the common Complaint to meet the expected statute of limitations deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- 4. I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

Dated: January 8, 2024

Respectfully submitted,

Docusigned by:
Erik Scott Warrer
68025D166385402...

[If applicable]
By Power of Attorney:

Docusigned by:
Erik Scott Warner
68025D1C53854B2...

Post Office Box 485 Narrowsburg, NY 12764	Civil Action No.
Et al. Plaintiffs,	
V	
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001	
Et al.  Defendants.	

- 1. I \_\_\_\_\_\_\_ make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries *pro se* without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- 3. However, I join the common Complaint to meet the expected statute of limitations deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

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5. I am suing because some members of the Washington, D.C. Metropolitan Police
Department and a very few members of the U.S. Capitol Police Department initiated excessive
use of force and violence, and I and others were injured psychologically, physically, or
chemically by the Defendants and not as part of actions initiated by the Plaintiff.

Dated: January 8, 2024

Respectfully submitted,

[If applicable]

By Power of Attorney:

EDWARD IACODIANO

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

Ī

il Action No.

- 1. I \_\_\_\_\_\_ make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries *pro se* without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- 3. However, I join the common Complaint to meet the expected statute of limitations deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- 4. I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

Dated: January 8, 2024

Respectfully submitted,

Gorge Tanios

[If applicable]
By Power of Attorney:

GLOVAL Tamios

ř

EDWARD JACOB LANG Post Office Box 485 Narrowsburg, NY 12764		Civil Action No.
Et al.	Plaintiffs,	
V.		
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001		
Et al.	fendants.	

- Gilbert Fonticoba 1. make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries pro se without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- 3. However, I join the common Complaint to meet the expected statute of limitations deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- 4. I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

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5. I am suing because some members of the Washington, D.C. Metropolitan Police
Department and a very few members of the U.S. Capitol Police Department initiated excessive
use of force and violence, and I and others were injured psychologically, physically, or
chemically by the Defendants and not as part of actions initiated by the Plaintiff.

Dated: January 8, 2024

Respectfully submitted,

DocuSigned by:

AF600A033062401

[If applicable]
By Power of Attorney:

AF8CBAD330C24B1

EDWARD JACOB LANG Post Office Box 485 Narrowsburg, NY 12764	Civil Action No.
Et al. Plaintiffs,	
$\mathbf{v}_{\cdot}$	
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001	
Et al. Defendants.	

- Gina Bisignano 1. \_\_\_\_ make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries pro se without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- 3. However, I join the common Complaint to meet the expected statute of limitations deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- I understand that I can hire an attorney to pursue my claims and my lawyer may be able 4. to amend my own individual Complaint.

Dated: January 8, 2024

Respectfully submitted,

[If applicable]

By Power of Attorney:

Gran Busian

Docusigned by:

EDWARD JACOB LANG Post Office Box 485 Narrowsburg, NY 12764	Civil Action No.
Et al. Plaintiffs,	
V-	
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001	
Et al.  Defendants.	

- 1. I \_\_\_\_\_\_ make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries *pro se* without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- 3. However, I join the common Complaint to meet the expected statute of limitations deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- 4. I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

Dated: January 8, 2024

Respectfully submitted,

-DocuSigned by:

Nancy Cloise Singletary

[If applicable]
By Power of Attorney:

MICHELLE HELMINEN Post Office Box 9120 Chelsea, Massachusetts [03461]	Civil Action No.
Et al. Plaintiffs,	-
ν.	
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001	
Et al. Defendants.	

- I MICHELLE HELMINEN make my claim as an additional Plaintiff against the
   Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries pro se without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- 3. However, I join the common Complaint to meet the expected statute of limitations deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- 4. I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.
- 5. I am suing because some members of the Washington, D.C. Metropolitan Police

Department and a very few members of the U.S. Capitol Police Department initiated excessive use of force and violence, and I and others were injured psychologically, physically, or chemically by the Defendants and not as part of actions initiated by the Plaintiff.

Dated: January 8, 2024

Respectfully submitted,

EDWARD JACOB LANG Post Office Box 485 Narrowsburg, NY 12764		Civil Action No.	
Et al.	Plaintiffs,		
V.			
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001			
Et al.	efendants.		
ADDITIONAL 1	PLAINTIFF JOINING IN TE	IE COMPLAINT	
1. I Nathan DeGrave	make my claim as	an additional Plaintiff against	
the Defendants as alleged in the	Complaint, by joining in the all	egations and claims and demands	
for relief of the common Compla	int.		
2. I am suing for my own pl	nysical injuries and/or chemical	l gas injuries pro se without a	
lawyer, and I do not speak for or	represent any of the other Plain	ntiffs, and none of the other	
Plaintiffs speak for me.			
3. However, I join the comm	However, I join the common Complaint to meet the expected statute of limitations		
deadline and because filing indiv	ridual Complaints that are nearl	y the same would not be efficient	
and would be confusing and unn	ecessary extra work.		
4. I understand that I can hi	I understand that I can hire an attorney to pursue my claims and my lawyer may be able		

to amend my own individual Complaint.

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5. I am suing because some members of the Washington, D.C. Metropolitan Police
Department and a very few members of the U.S. Capitol Police Department initiated excessive
use of force and violence, and I and others were injured psychologically, physically, or
chemically by the Defendants and not as part of actions initiated by the Plaintiff.

Dated: January 8, 2024

Respectfully submitted,

Nathan Di Grave

[If applicable]
By Power of Attorney:

EDWARD JACOB LANG Post Office Box 485 Narrowsburg, NY 12764	Civil Action No.
Et al. Plaintiffs,	
V.	
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001	
Et al. Defendants.	
ADDITIONAL PLAINTIFF JOINING IN TH	IE COMPLAINT
1. I make my claim as	an additional Plaintiff against
the Defendants as alleged in the Complaint, by joining in the all	egations and claims and demands
for relief of the common Complaint.	
2. I am suing for my own physical injuries and/or chemical	gas injuries pro se without a
lawyer, and I do not speak for or represent any of the other Plain	ntiffs, and none of the other
Plaintiffs speak for me.	
3. However, I join the common Complaint to meet the expe	ected statute of limitations
deadline and because filing individual Complaints that are nearly	y the same would not be efficient
and would be confusing and unnecessary extra work.	
4. I understand that I can hire an attorney to pursue my claims and my lawyer may be able	
to amend my own individual Complaint.	

Dated: January 8, 2024

Respectfully submitted,

[If applicable]
By Power of Attorney:

Post Office Box 485 Narrowsburg, NY 12764	Civil Action No.
Et al. Plaintiffs,	
v.	
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001	
Et al.  Defendants.	

#### SWORN DECLARATION OF INDIVIDUAL STATEMENT OF FACTS of Plaintiff MICHELLE HELMINEN

I, the undersigned, hereby declare under oath and penalty of perjury, and hereby state in writing as follows:

- My name is MICHELLE HELMINEN.
- 2. I am legally competent to make this affidavit. I am over the age of 18 years old.
- 3. I make this affidavit from personal, first-hand knowledge except where I explicitly identify another basis for my understanding, knowledge, and belief.
- 4. I make this affidavit under the laws of the United States of America within its territory.
- 5. I join in this lawsuit and adopt the substance and content of this Complaint as

my own suit, and I provide these further details of my personal situation.

- 6. On January 6th of 2021 I, MICHELLE HELMINEN, attended President Trump's speech in Washington DC.
- 7. I arrived at the President's speech early in the day and was surprised at how quiet the whole city in that area was. There were people dressed in plain clothes standing at various distances from one another handing out books for free when I arrived on Pennsylvania Ave NW near Pershing Park. After thumbing through the book I was given by one of them, it was clear it was a book intended to deter the reader from Republican views, and it appeared to me that the people handing out the stacks of books were coordinating with one another as I saw them talking across the street to one another about if they had given books to a couple of different groups of people who were walking towards the Ellipse. There wasn't any traffic on the streets in that area of Washington DC from what I could see, and throughout the day, more and more people arrived on foot near the monuments and Ellipse. The grassy ground near the Washington Monument and Ellipse were wet and slightly muddy that day.
- 8. After President Trump's speech where he told us to 'pcacefully and patriotically' walk towards the Capitol building, I left the area of the Washington Monument and walked down Constitution Avenue to the US Capitol. During the walk, I observed many people singing Patriotic songs, and hymns. Once I got closer towards the Capitol building, I observed a gathering of people on the south side of the street on the sidewalk near the National Gallery of Art holding up very large, graphic posters of aborted babies and/or babies in the process of being aborted. I was confused about why those people were doing that because it appeared to me that they

were attempting to intentionally incite anger in the people walking by, as many of the men and women walking towards the Capitol were wearing Trump merchandise clothing, and I heard many of the people walking speak upon seeing the images saying they (already) believed abortion is wrong. I didn't understand why this group would be holding up these extremely graphic posters to a group who already opposed abortion.

- 9. I was one of the first people to arrive at the Capitol, and was surprised the lawn was clear to walk up to the building. I observed people dressed as police officers showing other pedestrians where the stairs were and where to go to get into the Capitol entrance near the north side of the building going away from the steps, including using arm gestures as though inviting people closer and into the building. I stood on the northwest side of the Capitol near the area of the Peace Monument. I stayed in this area and prayed with a group of people, and observed other groups praying including someone leading a prayer behind me somewhere through a megaphone.
- 10. I believed the many hundreds of thousands of us who were there were exercising our right of remonstrance, to our legislature, afforded to us in the Bill of Rights. It was my experience that my elected legislators were not representing my wishes, the wishes of many of the people I know and had spoken to, and my past efforts of trying to remind our elected officials that they are supposed to be representing the voices of the American men and women who voted them into their offices they held, had all appeared to have fallen on deaf ears. One example of this was the many letters I sent to Senators and Representatives in my state asking them to

advocate and vote against the Medicare reimbursement cuts. Many months after sending these letters, I received a response back from one of the Senator's offices addressed to me thanking me for my letter regarding the Opioid epidemic. I never once mentioned anything about Opioids in my letter. Another example has been the 90 plus years we've waited for an action on Congressman Louis T. McFadden's petition for Articles of Impeachment he brought to Congress on May 23, 1933 which were referred to the Judiciary Committee and has YET TO BE ACTED ON.

- 11. On this day in Washington DC, in January of 2021, the President of the Senate was going to be making a decision, and I wanted him to hear the hundreds of thousands of American men and women singing outside of the US Capitol building in the street to remind him, and all of the Senators and elected officials within our republic, whose voices they represent and who they work for. I observed Capitol Police officers, DC Metro Police officers and other unknown people interfering with, obstructing, and preventing me, and many others from exercising my and our right of remonstrance, our right to peaceably assemble, and other rights.
- 12. As I was walking around E Capitol Circle, I noticed a couple pieces of portable fences near the sidewalk with gaps in them, but the rest of the grass area between the sidewalk and the Capitol building were wide open with some of the same portable metal fences up by the bottom of the stairs of the Capitol building. There, I observed people dressed in Riot Gear with batons walking around both sides of the fences as they appeared to be waiting for the crowd to approach them. As the crowd approached them, I saw and heard a man yell "wait I have to get my shot" and saw him take what appeared to be several photos with his cell phone of people in Trump

merchandise clothing on the west side of the portable metal fence with police on the east side of the same fence. When the man stopped standing with his phone up in the air as though he were taking several photos in a row, the people in Trump clothing near the fence walked away from the fence a bit and stood near the fence for awhile making relaxed arm gestures. It appeared to me that the people on each side of the fence were talking to one another for awhile.

- 13. As more people started trickling into the Capitol building area, I started hearing loud booming sounds and saw flashes of yellow smoke fill the air coming from the area between the scaffolding and stairs of the Capitol building. Throughout the day, this loud canon-like boom became a frequent and common noise that I heard. Most of the people around me, and that I saw, appeared to be Trump supporters who looked more to me like they were going to an outdoor family reunion than to a protest. Many were still singing or praying outside of the US Capitol, and many were smiling and appeared to be enjoying the cold, overcast day, after having the experience of seeing the President of the United States of America in person near the Ellipse shortly before.
- 14. At first, the canon booms seemed festive to me, but I was concerned about the pungent chemical smell and taste that started coating my tongue as the day continued on and the yellow haze of smoke kept filling the air with each boom. During the gathering at the Capitol building, I saw a large group of Metro DC Police officers arrive at the Capitol in the area near the intersection of E Capitol Circle and New Jersey Ave NW and Delaware Ave NE. They were wearing and dressing into Riot Gear and started marching through the crowd.

- 15. After awhile, I heard people in the crowd saying that there's help needed at the front pointing towards the bottom of the stairs of the Capitol building and I heard people saying that the police were hitting people with their batons. A group of men walked briskly past me, as though they were on a mission, and I was bumped by and startled by one of them. In the moment, I instinctively felt the need to tell these men to be "good Christian men up there" as they traveled towards the front because I was alarmed by how tactically they moved through the crowd and went straight to the front at the Capitol.
- munitions into the crowd of static protestors tens to hundreds of times that day. They did not give any warning or dispersal order before they started this assault, and I didn't even know at first if the noise coming from the front was a celebration or what was happening because the majority of the crowd was static for the majority of the time that I was there. I was still surprised by how quiet the environment was apart from the canon-like booms before the flash bangs started. I began wondering if I needed to be worried about any of my future babics having birth defects if I'm breathing in yellow gas for several hours as the haze lingered on and started feeling like it was burning my skin on my face, my throat, and eyes. I didn't know if it was tear gas, or what kind of gas it was but it was a yellow color when it came out. I started scraping it off of my tongue because it felt like it was coating my air passages, and clumps of discolored yellow/white/gray residue came off of my tongue the several times that I did this.
- 17. After the DC Metro Police arrived, it appeared that the commotion towards

the front became much louder and more intense. It became obvious at this point that the police were beating the men and women in front of me with their batons, and more flashing and banging noises started going off into the crowd. The whole area started to feel more like a war zone despite the majority of the crowd remaining in the street, not fighting anyone, and several people leaving the area. I was again confused about why the police were hitting people because they had just been inviting everyone into the Capitol building earlier. Many of the men and women in Trump gear that I saw, including going towards the front where the base of the stairs to the US Capitol were, were broadcasting to one another to just stand in peace. I heard many saying things like "we support the Blue."

- 18. I was grateful I hadn't adhered to one Police officer's gestures of welcoming me in towards the capitol building because it appeared to me that one of their superior officers or someone must have changed their minds and told the Police to stop letting people in and/or stop them from coming towards the Capitol with such an abrupt change in their behavior towards us. I observed as many people remained standing at a distance horrorstuck at what was happening in front of them. It became obvious to me that I would face imminent harm by remaining in the vicinity of the Capitol, and I felt unsafe not knowing who the peace officers were anymore observing the startling behavior and acts of violence perpetrated against the men and women in front of me by people who came out of police vehicles and were wearing uniformed clothing with weapons.
- 19. On that day I witnessed what I would call police brutality by some of the US Capitol Police toward those of us in the crowd who intended to peacefully protest.

- 20. I, Michelle Helminen, swear by these statements as accurate and truthful to the best of my knowledge and belief.
- 21. Not being a lawyer, I cannot swear under oath to legal procedures, laws, or legal conclusions, which I believe to be correct, but I swear only to the facts as I witnessed them.

Dated: January 8, 2024

Respectfully submitted,

Plaintiffs speak for me.

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

EDWARD JACOB LANG Post Office Box 485 Narrowsburg, NY 12764	Civil Action No.
Et al. Plaintiffs,	
V.	
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001	
Et al. Defendants.	
ADDITIONAL PLAINTIFF JOINING IN THE CO	MPLAINT
1. Imichelle Helminen make my claim as an add	itional Plaintiff against
the Defendants as alleged in the Complaint, by joining in the allegation	s and claims and demands
for relief of the common Complaint.	
2. I am suing for my own physical injuries and/or chemical gas inj	uries pro se without a

3. However, I join the common Complaint to meet the expected statute of limitations deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.

lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other

4. I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

Dated: January 8, 2024

Respectfully submitted,

DocuSigned by:

[If applicable]
By Power of Attorney:

Civil Action No.

EDWARD JACOB LANG	j
Post Office Box 485	
Narrowsburg, NY 12764	

Et al.

Plaintiffs,

V.

SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001

Et al.

Defendants.

- I Jalise Middleton make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries *pro se* without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- 3. However, I join the common Complaint to meet the expected statute of limitations deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- 4. I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

Dated: January 8, 2024

Respectfully submitted.

Middeton

Jalise Middletor

[If applicable]
By Power of Attorney:

EDWARD JACOB LANG
Post Office Box 485
Narrowsburg, NY 12764

Civil Action No.

Et al.

Plaintiffs,

V.

SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001

Et al.

Defendants.

# SWORN DECLARATION OF INDIVIDUAL STATEMENT OF FACTS of Plaintiff DONALD HAZARD

I, the undersigned, hereby declare under oath and penalty of perjury, and hereby state in writing as follows:

- My name is Jalise Middleton.
- 2. I am legally competent to make this affidavit. I am over the age of 18 years old.
- I make this affidavit from personal, first-hand knowledge except where I explicitly identify another basis for my understanding, knowledge, and belief.
- 4. I make this affidavit under the laws of the United States of America within its territory.
- 5. I join in this lawsuit and adopt the substance and content of this Complaint as my own suit, and I provide these further details of my personal situation.
- 6. On January 6th of 2021 I, Jalise Middleton, attended President Trump's speech in

Washington DC.

- 7. Near the conclusion of his speech I then proceeded to the US Capitol building to peacefully protest.
- 8. Upon arriving to the property I came to a barricade on the capitol steps. At that barricade I was violated by Metro PD officers being extremely violent and aggressive toward the crowd.
- 9. They were using various tactics against the crowd such as mace, rubber bullets, tear gas, flash bang grenades, and stun grenades.
- 10. I also was attacked by officers beating us with their police batons as well as grabbing us and trying to pull us over the barricade.
- 11. I had multiple grenades go off in close proximity to me.
- 12. I was grabbed and struck by multiple MPD and never given clear instructions on what I did to upset them, or given instructions as to what they wanted me to do. I was given no opportunity to retreat as they were holding me against the barricades while beating me.
- 13. They sprayed me in the face with mace rendering me completely blind.
- 14. Other protesters in the crowd beat the officers with flag poles to get them to release me while the protesters pulled me back from their grip, and took me to safety where I was able to rinse my eyes with bottled water and recover from the mace that temporarily blinded me.
- 15. From there I left the Capitol building and returned to our hotel where we stayed rest of the night.
- 16. On that day I witnessed what I would call police brutality by some of the Metro PD toward those of us in the crowd who intended to peacefully protest.
- I, Jalise Middleton, swear by these statements as accurate and truthful to the best of my knowledge and belief.

### 

18. Not being a lawyer, I cannot swear under oath to legal procedures, laws, or legal conclusions, which I believe to be correct, but I swear only to the facts as I witnessed them.

Dated: January 8, 2024

Respectfully submitted,

Jalise Middleton

<b>EDWARD JACOB LANG</b>
Post Office Box 485
Narrowsburg, NY 12764

Civil Action No.

Et al-

Plaintiffs,

V.

SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001

Et al.

Defendants.

# SWORN DECLARATION OF INDIVIDUAL STATEMENT OF FACTS of Plaintiff DONALD HAZARD

I, the undersigned, hereby declare under oath and penalty of perjury, and hereby state in writing as follows:

- My name is Mark Middleton.
- 2. I am legally competent to make this affidavit. I am over the age of 18 years old.
- I make this affidavit from personal, first-hand knowledge except where I explicitly identify another basis for my understanding, knowledge, and belief.
- 4. I make this affidavit under the laws of the United States of America within its territory.
- 5. I join in this lawsuit and adopt the substance and content of this Complaint as my own suit, and I provide these further details of my personal situation.
- 6. On January 6th of 2021 I, Mark Middleton, attended President Trump's speech in

Washington DC.

- Near the conclusion of his speech I then proceeded to the US Capitol building to peacefully protest.
- 8. Upon arriving to the property I came to a barricade on the capitol steps. At that barricade I was violated by Metro PD officers being extremely violent and aggressive toward the crowd.
- They were using various tactics against the crowd such as mace, rubber bullets, tear gas,
   flash bang grenades, and stun grenades.
- 10. I also was attacked by officers beating us with their police batons as well as grabbing us and trying to pull us over the barricade.
- 11. I had multiple grenades go off in close proximity to me.
- 12. I was grabbed and struck by multiple MPD and never given clear instructions on what I did to upset them, or given instructions as to what they wanted me to do. I was given no opportunity to retreat as they were holding me against the barricades while beating me.
- 13. They sprayed me in the face with mace rendering me completely blind.
- 14. Other protesters in the crowd beat the officers with flag poles to get them to release me while the protesters pulled me back from their grip, and took me to safety where I was able to rinse my eyes with bottled water and recover from the mace that temporarily blinded me.
- 15. From there I left the Capitol building and returned to our hotel where we stayed rest of the night.
- 16. On that day I witnessed what I would call police brutality by some of the Metro PD toward those of us in the crowd who intended to peacefully protest.
- 17. I, Jalise Middleton, swear by these statements as accurate and truthful to the best of my knowledge and belief.

## 

18. Not being a lawyer, I cannot swear under oath to legal procedures, laws, or legal conclusions, which I believe to be correct, but I swear only to the facts as I witnessed them.

Dated: January 8, 2024

Respectfully submitted,

Mark Middleton

Civil Action No.

EDWARD JACOB LANG
Post Office Box 485
Narrowsburg, NY 12764

Et al.

Plaintiffs,

V.

SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001

Et al.

Defendants.

- I Mark Middleton make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries *pro se* without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- 3. However, I join the common Complaint to meet the expected statute of limitations deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

## Case 1:24-cv-00295-DLF Document 5 Filed 02/06/24 Page 130 of 236

5. I am suing because some members of the Washington, D.C. Metropolitan Police
Department and a very few members of the U.S. Capitol Police Department initiated excessive
use of force and violence, and I and others were injured psychologically, physically, or
chemically by the Defendants and not as part of actions initiated by the Plaintiff.

Dated: January 8, 2024

Respectfully submitted,

Mark Middleton

1

Post Office Box 485 Narrowsburg, NY 12764	Civil Action No.
Et al. Plaintiffs,	-
v.	
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001	
Et al.  Defendants.	

- I Rachel Powell make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries pro se without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- 3. However, I join the common Complaint to meet the expected statute of limitations deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

Dated: January 8, 2024

Respectfully submitted,

[If applicable] By Power of Attorney:

EDWARD JACOB LANG Post Office Box 485 Narrowsburg, NY 12764	Civil Action No.
Et al.	Plaintiffs,
V.	
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001	
Et al. Defe	èndants.
ADDITIONAL PI	LAINTIFF JOINING IN THE COMPLAINT
1. I PETER HARDING	make my claim as an additional Plaintiff against
the Defendants as alleged in the Co	omplaint, by joining in the allegations and claims and demand
for relief of the common Complain	nt.
2. I am suing for my own phy	vsical injuries and/or chemical gas injuries pro se without a
lawyer, and I do not speak for or re	epresent any of the other Plaintiffs, and none of the other
Plaintiffs speak for me.	
3. However, I join the commo	on Complaint to meet the expected statute of limitations

4. I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

and would be confusing and unnecessary extra work.

deadline and because filing individual Complaints that are nearly the same would not be efficient

Dated: January 8, 2024

Respectfully submitted,

[If applicable]

By Power of Attorney:

INDIVIDUAL SIGNATURES

RACHEL POWELL, Pro Se

Rachel Powell

Post Office Box 485 Narrowsburg, NY 12764		Civil Action No.
Et al.	Plaintiffs,	
V.		
SARGEANT DANIEL THAU Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001		
Et al-	Defendants	

- 1. I Robert William DeGregoris make my claim as an additional Plaintiff against the

  Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries pro se without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- 3. However, I join the common Complaint to meet the expected statute of limitations deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

Dated: January 8, 2024

Respectfully submitted,

[If applicable]

By Power of Attorney:

EDWARD JACOB LANG Post Office Box 485 Narrowsburg, NY 12764	Civil Action No.
Et al. Plaintiffs,	-
ν.	
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001	
Et al.  Defendants.	

- 1. I make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries *pro se* without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- 3. However, I join the common Complaint to meet the expected statute of limitations deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

Dated: January 8, 2024

Respectfully submitted,

— DoeuSigned by:
KULUU KUMVEK
— 59D67DE3AC3043E

[If applicable]
By Power of Attorney:

DocuSigned by:

KAUU KUNVEK

59067BE3AC3843E

Post Office Box 485 Narrowsburg, NY 12764	Civil Action No.
Et al. Plaintiffs,	8
$\mathbf{v}_{\mathrm{s}}$	
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001	
Et al.  Defendants.	

- 1. I \_\_\_\_\_\_ make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries *pro se* without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- 3. However, I join the common Complaint to meet the expected statute of limitations deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- 4. I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

Dated: January 8, 2024

Respectfully submitted,

— Docusigned by:

William Robert Norwood

— 6754397488EA4F9...

[If applicable]
By Power of Attorney:

Post Office Box 485 Narrowsburg, NY 12764	Civil Action No.
Et al. Plaintiffs,	Shipman allows the shipman are an allow to
v	
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001	
Et al.  Defendants	

- I Robert William DeGregoris make my claim as an additional Plaintiff against the
   Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries pro se without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- 3. However, I join the common Complaint to meet the expected statute of limitations deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

Dated: January 8, 2024

Respectfully submitted,

[If applicable]

By Power of Attorney:

EDWARD JACOB LANG Post Office Box 485 Narrowsburg, NY 12764	Civil Action No.
Et al. Plaintiffs,	
v,	
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001	
Et al.  Defendants.	
ADDITIONAL PLAINTIFF JOINING IN TH	IE COMPLAINT
1. I Ronald Palentchar	make my claim as an additional
Plaintiff against the Defendants as alleged in the Complaint, by	joining in the allegations and
claims and demands for relief of the common Complaint.	
2. I am suing for my own psychological and chemical gas	injuries pro se without a lawyer,
and I do not speak for or represent any of the other Plaintiffs, ar	nd none of the other Plaintiffs
speak for me.	
3. However, I join the common Complaint to meet the expe	ected statute of limitations
deadline and because filing individual Complaints that are nearl	y the same would not be efficient
and would be confusing and unnecessary extra work.	
4. I understand that I can hire an attorney to pursue my clair	ms and my lawyer may be able
to amend my own individual Complaint.	

Dated: January 8, 2024

Respectfully submitted,

Ronald Palentchar

Ronald Palentchar

01/08/24

[If applicable]

EDWARD JACOB LANG Post Office Box 485 Narrowsburg, NY 12764	Civil Action No.
Et al. Plaintiffs,	
ν.	
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001	
Et al. Defendants.	=

- 1. I \_\_\_\_\_ make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries *pro se* without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- 3. However, I join the common Complaint to meet the expected statute of limitations deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

DocuSign Envelope ID: C4CF48B4-5F95-43AC-A49F-F8F8CAC478B9

5. I am suing because some members of the Washington, D.C. Metropolitan Police
Department and a very few members of the U.S. Capitol Police Department initiated excessive
use of force and violence, and I and others were injured psychologically, physically, or
chemically by the Defendants and not as part of actions initiated by the Plaintiff.

Dated: January 8, 2024

Respectfully submitted,

-DecuSigned by:

-CD628E25564E499

[If applicable]

EDWARD JACOB LANG Post Office Box 485 Narrowsburg, NY 12764	Civil Action No.
Et al., Plaintiffs,	
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001	
Et al.  Defendants.	

- 1. I \_\_\_\_\_ make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries *pro se* without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- 3. However, I join the common Complaint to meet the expected statute of limitations deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

Dated: January 8, 2024-

Respectfully submitted,

[If applicable]
By Power of Attorney:

Docusigned by:

Sean David wallyon
1886509AOCB9419...

Post (	ARD JACOB LANG Office Box 485 owsburg, NY 12764	Civil Action No.
Et al	Plaintiffs,	-
	V.	
Metro 441 4	GEANT DANIEL THAU, opolitan Police Department th Street, NW, 7th Floor ington, DC 20001	
Et al.	Defendants.	
7	ADDITIONAL PLAINTIFF JOINING IN TH	E COMPLAINT
1.	I make my claim as	an additional Plaintiff against
the D	efendants as alleged in the Complaint, by joining in the alle	egations and claims and demands
for re	lief of the common Complaint.	
2.	I am suing for my own physical injuries and/or chemical	gas injuries pro se without a
lawye	er, and I do not speak for or represent any of the other Plair	atiffs, and none of the other
Plaint	tiffs speak for me.	
3.	However, I join the common Complaint to meet the expe	ected statute of limitations
deadl	ine and because filing individual Complaints that are nearly	y the same would not be efficient
and w	would be confusing and unnecessary extra work.	
4.	I understand that I can hire an attorney to pursue my clai	ms and my lawyer may be able
to am	end my own individual Complaint.	

Dated: January 8, 2024

Respectfully submitted,

[If applicable]

Post Office Box 485 Narrowsburg, NY 12764	Civil Action No.
Et al. Plaintiffs,	*
v.	
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001	
Et al.  Defendants.	

- 1. I \_\_\_\_\_\_ make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries *pro se* without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- 3. However, I join the common Complaint to meet the expected statute of limitations deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

DocuSign Envelope ID: 1470DCFA-AD94-4020-B6BE-0AA0CDB7C6C6

5. I am suing because some members of the Washington, D.C. Metropolitan Police
Department and a very few members of the U.S. Capitol Police Department initiated excessive
use of force and violence, and I and others were injured psychologically, physically, or
chemically by the Defendants and not as part of actions initiated by the Plaintiff.

Dated: January 8, 2024

Respectfully submitted,

—B451BB170A3740B.

[If applicable]
By Power of Attorney:

1

EDWARD JACOB LANG Post Office Box 485 Narrowsburg, NY 12764	Civil Action No.
Et al. Plaintiffs,	
$V_{\cdot}$	
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001	
Et al. Defendants.	

- Sean Henry \_\_\_\_ make my claim as an additional Plaintiff against 1. the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- I am suing for my own physical injuries and/or chemical gas injuries pro se without a 2. lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- 3. However, I join the common Complaint to meet the expected statute of limitations deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- I understand that I can hire an attorney to pursue my claims and my lawyer may be able 4. to amend my own individual Complaint.

Dated: January 8, 2024

Respectfully submitted,

—DocuSigned by:

[If applicable]
By Power of Attorney:

DocuSigned by:

EDWARD JACOB LANG Post Office Box 485 Narrowsburg, NY 12764	Civil Action No.
Et al. Plaintiffs,	
V,	
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001	
Et al.  Defendants.	
ADDITIONAL PLAINTIFF JOINING I	N THE COMPLAINT

- 1. I make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries *pro se* without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- 3. However, I join the common Complaint to meet the expected statute of limitations deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- 4. I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

Dated: January 8, 2024

Respectfully submitted,

[If applicable]

EDWARD JACOB LANG Post Office Box 485 Narrowsburg, NY 12764	Civil Action No.
Et al.	
Plaintiffs,	
v.	
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001	
Et al.	
Defendants.	

- 1. I Sean Mchugh make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries *pro se* without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- 3. However, I join the common Complaint to meet the expected statute of limitations deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

Dated: January 8, 2024

Respectfully submitted,

anything

[If applicable]

1

Post Office Box 485 Narrowsburg, NY 12764		Civil Action No.
Et al.	Plaintiffs,	
V.		
SARGEANT DANIEL THA Metropolitan Police Departm 441 4th Street, NW, 7th Floo Washington, DC 20001	nent	
Et al.	Defendants.	ii ii

- 1. I \_\_\_\_\_\_ make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries *pro se* without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- 3. However, I join the common Complaint to meet the expected statute of limitations deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- 4. I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

Dated: January 8, 2024

Respectfully submitted,

DocuStaned by:

-722GB4EBGB8B4FD

[If applicable]

By Power of Attorney:

- DocuSigned by:

Ulu Gulan

EDWARD JACOB LANG Post Office Box 485 Narrowsburg, NY 12764	Civil Action No.
Et al. Plaintiffs,	
v.	
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001	
Et al. Defendants.	
ADDITIONAL PLAINTIFF JOINING IN TH	IE COMPLAINT

- SuZan McClain make my claim as an additional Plaintiff against 1. the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries pro se without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- However, I join the common Complaint to meet the expected statute of limitations 3. deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- I understand that I can hire an attorney to pursue my claims and my lawyer may be able 4. to amend my own individual Complaint.

Dated: January 8, 2024

Respectfully submitted,

Sugar McClain

[If applicable]

Post Office Box 485 Narrowsburg, NY 12764	Civil Action No.
Et al. Plaintiffs,	
v.	
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001	
Et al.  Defendants.	

- 1. I Trevor Andrew Brown make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries *pro se* without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- 3. However, I join the common Complaint to meet the expected statute of limitations deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- 4. I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

Dated: January 8, 2024

Respectfully submitted,

Trevos Bo

[If applicable]

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EDWARD JACOB LANG Post Office Box 485 Narrowsburg, NY 12764	Civil A	Action No.
Et al.  Plaintiffs,  v.		
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001		
Et al.  Defendants.		

- TUCKER WESTON make my claim as an additional Plaintiff against 1. the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries pro se without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- However, I join the common Complaint to meet the expected statute of limitations 3. deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- I understand that I can hire an attorney to pursue my claims and my lawyer may be able 4. to amend my own individual Complaint.

Dated: January 8, 2024

Respectfully submitted,

TUCKER WESTON

[If applicable]
By Power of Attorney:

TUCKER WESTON

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Post Office Box 485 Narrowsburg, NY 12764	Civil Action No.
Et al. Plaintiffs,	
v.	
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001	
Et al.  Defendants.	

- 1. I \_\_\_\_\_\_ make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries *pro se* without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- However, I join the common Complaint to meet the expected statute of limitations
  deadline and because filing individual Complaints that are nearly the same would not be efficient
  and would be confusing and unnecessary extra work.
- 4. I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

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5. I am suing because some members of the Washington, D.C. Metropolitan Police
Department and a very few members of the U.S. Capitol Police Department initiated excessive
use of force and violence, and I and others were injured psychologically, physically, or
chemically by the Defendants and not as part of actions initiated by the Plaintiff.

Dated: January 8, 2024

Respectfully submitted,

Docusigned by:

[If applicable]
By Power of Attorney:

4.

to amend my own individual Complaint.

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

EDWARD JACOB LANG Post Office Box 485 Narrowsburg, NY 12764	Civil Action No.
Et al. Plaintiffs,	
v.	
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001	
Et al.  Defendants.	
ADDITIONAL PLAINTIFF JOINING IN THE COM	<b>IPLAINT</b>
1. I make my claim as an addi	tional Plaintiff against
the Defendants as alleged in the Complaint, by joining in the allegations	and claims and demands
for relief of the common Complaint.	
2. I am suing for my own physical injuries and/or chemical gas injuries	iries <i>pro se</i> without a
lawyer, and I do not speak for or represent any of the other Plaintiffs, an	d none of the other
Plaintiffs speak for me.	
3. However, I join the common Complaint to meet the expected sta	tute of limitations
deadline and because filing individual Complaints that are nearly the sar	me would not be efficient
and would be confusing and unnecessary extra work.	

I understand that I can hire an attorney to pursue my claims and my lawyer may be able

DocuSign Envelope ID: 3B69C0C4-F033-48B6-9277-D6F876C7EFEC

5. I am suing because some members of the Washington, D.C. Metropolitan Police
Department and a very few members of the U.S. Capitol Police Department initiated excessive
use of force and violence, and I and others were injured psychologically, physically, or
chemically by the Defendants and not as part of actions initiated by the Plaintiff.

Dated: January 8, 2024

Respectfully submitted,

AE07E68GD9DB4A

DocuSigned by:

[If applicable]
By Power of Attorney:

AE67E68CD9DB4A2

Post Office Box 485 Narrowsburg, NY 12764	Civil Action No.
Et al. Plaintiffs,	
V.	
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001	
Et al. Defendants.	

- 1. I \_\_\_\_\_\_ make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries *pro se* without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- 3. However, I join the common Complaint to meet the expected statute of limitations deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

DocuSign Envelope ID: 76C95403-EDFD-4378-80C6-81068F30BCDD

5. I am suing because some members of the Washington, D.C. Metropolitan Police
Department and a very few members of the U.S. Capitol Police Department initiated excessive
use of force and violence, and I and others were injured psychologically, physically, or
chemically by the Defendants and not as part of actions initiated by the Plaintiff.

Dated: January 8, 2024

Respectfully submitted,

-- DocuSigned by:

[If applicable]

2764	Civil Action No.
Plaintiffs,	
IEL THAU, e Department J, 7th Floor	
Defendants.	
	Plaintiffs,  IEL THAU, the Department To 7,7th Floor  10001

- 1. I \_\_\_\_\_ make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries *pro se* without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- 3. However, I join the common Complaint to meet the expected statute of limitations deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- 4. I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

DocuSign Envelope ID: A3BDF8EB-407E-492C-9813-6917D86F6BFD

5. I am suing because some members of the Washington, D.C. Metropolitan Police
Department and a very few members of the U.S. Capitol Police Department initiated excessive
use of force and violence, and I and others were injured psychologically, physically, or
chemically by the Defendants and not as part of actions initiated by the Plaintiff.

Dated: January 8, 2024

Respectfully submitted,

— DocuSigned by:

-66782ADGC597449

[If applicable]

By Power of Attorney:

- DocuSigned by:

Dugne & Dan

EDWARD JACOB LANG Post Office Box 485 Narrowsburg, NY 12764	Civil Action No.
Et al. Plaintiffs,	
<b>v</b> .	
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001	
Et al. Defendants.	
ADDITIONAL PLAINTIF	F JOINING IN THE COMPLAINT
1. I Zachary Rehl	_make my claim as an additional Plaintiff against
the Defendants as alleged in the Complaint,	by joining in the allegations and claims and demands
for relief of the common Complaint.	
2. I am suing for my own physical injur	ies and/or chemical gas injuries pro se without a
lawyer, and I do not speak for or represent an	ny of the other Plaintiffs, and none of the other
Plaintiffs speak for me.	
3. However, I join the common Compla	aint to meet the expected statute of limitations

deadline and because filing individual Complaints that are nearly the same would not be efficient

I understand that I can hire an attorney to pursue my claims and my lawyer may be able

and would be confusing and unnecessary extra work.

to amend my own individual Complaint.

Dated: January 8, 2024

Respectfully submitted,

MIVU

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[If applicable]

By Power of Attorney:

DocuSigned by:

\_\_\_\_E9D05462BE46441.

r

Post Office Box 485 Narrowsburg, NY 12764	Civil Action No.
Et al. Plaintiffs,	
V.	
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001	
Et al.  Defendants.	

- 1. I \_\_\_\_\_\_ make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries *pro se* without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- 3. However, I join the common Complaint to meet the expected statute of limitations deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- 4. I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

### 

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5. I am suing because some members of the Washington, D.C. Metropolitan Police
Department and a very few members of the U.S. Capitol Police Department initiated excessive
use of force and violence, and I and others were injured psychologically, physically, or
chemically by the Defendants and not as part of actions initiated by the Plaintiff.

Dated: January 8, 2024

Respectfully submitted,

Eathary Clam

[If applicable]
By Power of Attorney:

—Bocusigned by: Eachary Alam

Post Office Box 485 Narrowsburg, NY 12764	Civil Action No.
Et al. Plaintiffs,	
ν,	
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001	
Et al. Defendants.	

- 1. I \_\_\_\_\_\_ make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries *pro se* without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- 3. However, I join the common Complaint to meet the expected statute of limitations deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- 4. I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

Dated: January 8, 2024

Respectfully submitted,

Docusigned by:
Thica LaCount

Post Office Box 485 Narrowsburg, NY 12764	Civil Action No.
Et al.	-
Plaintiffs,	
V.	
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001	
Et al.	
Defendants.	

- 1. I \_\_\_\_\_\_\_ make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries *pro se* without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- 3. However, I join the common Complaint to meet the expected statute of limitations deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- 4. I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

Dated: January 8, 2024

Respectfully submitted,

DocuSigned by:

IJaac Sturgen

[If applicable]

By Power of Attorney:
Mary Hurgeon

Civil Action No.

- 1. I James Beeks make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries <u>pro se</u> without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- However, I join the common Complaint to meet the expected statute of limitations
  deadline and because filing individual Complaints that are nearly the same would not be efficient
  and would be confusing and unnecessary extra work.
- I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

Dated: January 8, 2024

Respectfully submitted.

James: Beeke?

[If applicable]

By Power of Attorney:

Post Office Box 485 Narrowsburg, NY 12		Civil Action No.
Et al.	Plaintiffs,	
V.		
SARGEANT DANI Metropolitan Police 441 4th Street, NW, Washington, DC 20	Department 7th Floor	
Et al.	Defendants.	

- 1. I \_\_\_\_\_\_ make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries *pro se* without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- 3. However, I join the common Complaint to meet the expected statute of limitations deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

DocuSign Envelope ID: 30440A47-529D-4469-83F0-1AD406E9DABF

5. I am suing because some members of the Washington, D.C. Metropolitan Police
Department and a very few members of the U.S. Capitol Police Department initiated excessive
use of force and violence, and I and others were injured psychologically, physically, or
chemically by the Defendants and not as part of actions initiated by the Plaintiff.

Dated: January 8, 2024

Respectfully submitted,

Docusigned by:

1:5 AAC N- ThD M 9s

BC3EF48C1F9148F

EDWARD JACOB LANG Post Office Box 485 Narrowsburg, NY 12764	Civil Action No.
Et al. Plaintiffs,	· · · · · · · · · · · · · · · · · · ·
V.	
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001	
Et al. Defendants.	
ADDITIONAL PLAINTIFF J	OINING IN THE COMPLAINT
1. I Hector Vargas m	nake my claim as an additional Plaintiff against
the Defendants as alleged in the Complaint, by	joining in the allegations and claims and demands
for relief of the common Complaint.	
2. I am suing for my own physical injuries	and/or chemical gas injuries pro se without a
lawyer, and I do not speak for or represent any	of the other Plaintiffs, and none of the other
Plaintiffs speak for me.	
3. However, I join the common Complaint	t to meet the expected statute of limitations
deadline and because filing individual Complain	nts that are nearly the same would not be efficien

I understand that I can hire an attorney to pursue my claims and my lawyer may be able

and would be confusing and unnecessary extra work.

to amend my own individual Complaint.

4.

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5. I am suing because some members of the Washington, D.C. Metropolitan Police
Department and a very few members of the U.S. Capitol Police Department initiated excessive
use of force and violence, and I and others were injured psychologically, physically, or
chemically by the Defendants and not as part of actions initiated by the Plaintiff.

Dated: January 8, 2024

Respectfully submitted,

DocuSigned by:

—EF008E6774FF441...

[If applicable]
By Power of Attorney:

- DocuSigned by

—EFDB8E5771FF441\_

EDWARD JACOB L. Post Office Box 485 Narrowsburg, NY 127		Civil Action No.
Et al.	Plaintiffs,	E
v.		
SARGEANT DANIE Metropolitan Police D 441 4th Street, NW, 7 Washington, DC 2000	Department Ith Floor	
Et al.	Defendants.	
<u> </u>		

- 1. I \_\_\_\_\_\_ make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries *pro se* without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- 3. However, I join the common Complaint to meet the expected statute of limitations deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- 4. I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

Dated: January 8, 2024

Respectfully submitted,

Docusigned by:

-6BB49AED37BF4C0

[If applicable]
By Power of Attorney:

- DoouSigned by

—88849AED37DF4C0

EDWARD JACOB LANG Post Office Box 485 Narrowsburg, NY 12764	Civil Action No.
Et al.	( <del></del>
Plaintiffs,	
V.	
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001	
Et al.	
Defendants.	
ADDITIONAL PLAINTIFF JOINING IN TH	HE COMPLAINT
1. IJared Lane Wisen	nake my claim as an additional
Plaintiff against the Defendants as alleged in the Complaint, by	joining in the allegations and
claims and demands for relief of the common Complaint.	
2. I am suing for my own physical injuries and/or chemical	I gas injuries pro se without a
lawyer, and I do not speak for or represent any of the other Plain	ntiffs, and none of the other
Plaintiffs speak for me.	
3. However, I join the common Complaint to meet the expe	ected statute of limitations
deadline and because filing individual Complaints that are nearly	y the same would not be efficient
and would be confusing and unnecessary extra work.	
4. I understand that I can hire an attorney to pursue my clair	ims and my lawyer may be able
to amend my own individual Complaint.	

Dated: January 8, 2024

Respectfully submitted,

Jared Lane Wise\_\_(Signed Digitally)\_\_

EDWARD JACOB LANG Post Office Box 485 Narrowsburg, NY 12764		Civil Action No.
Et al.	Plaintiffs,	
V.		
SARGEANT DANIEL THAT Metropolitan Police Departm 441 4th Street, NW, 7th Floor Washington, DC 20001	ent	
Et al.	Defendants.	

- 1. I \_\_\_\_\_\_ make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries *pro se* without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
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Dated: January 8, 2024

Respectfully submitted,

James Brett

[If applicable]
By Power of Attorney:

James Brett
FCD5DB3A418E469

EDWARD JACOB LANG Post Office Box 485 Narrowsburg, NY 12764		Civil Action No.
Et al.	Plaintiffs,	
	riamuns,	
V-:		
SARGEANT DANIEL THAU Metropolitan Police Departmer 441 4th Street, NW, 7th Floor Washington, DC 20001		
Et al.	Defendants.	

- 1. I \_\_\_\_\_\_ make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
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- 4. I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

DocuSign Envelope ID: 6C5BE96A-975E-44B1-9CA5-B01112EA781F

I am suing because some members of the Washington, D.C. Metropolitan Police Department and a very few members of the U.S. Capitol Police Department initiated excessive use of force and violence, and I and others were injured psychologically, physically, or chemically by the Defendants and not as part of actions initiated by the Plaintiff.

Dated: January 8, 2024

Respectfully submitted,

[If applicable]

By Power of Attorney:

Civil Action No.

- Jennifer Heinl make my claim as an additional Plaintiff against 1. the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- I am suing for my own physical injuries and/or chemical gas injuries pro se without a 2. lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- However, I join the common Complaint to meet the expected statute of limitations 3. deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

DocuSign Envelope ID: DA11C99A-D042-4367-9EA9-111659EB149C

5. I am suing because some members of the Washington, D.C. Metropolitan Police
Department and a very few members of the U.S. Capitol Police Department initiated excessive
use of force and violence, and I and others were injured psychologically, physically, or
chemically by the Defendants and not as part of actions initiated by the Plaintiff.

Dated: January 8, 2024

Respectfully submitted,

—BocuSigned by:

[If applicable]

By Power of Attorney:

1

EDWARD JACOB LANG Post Office Box 485 Narrowsburg, NY 12764	Civil Action No.
Et al. Plaintiffs,	
ν.	
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001	
Et al.  Defendants.	

- Jeffery Shane Witcher 1. make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries pro se without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
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- I understand that I can hire an attorney to pursue my claims and my lawyer may be able 4. to amend my own individual Complaint.

Dated: January 8, 2024

Respectfully submitted,

Docusigned by:

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4	Civil Action No.
Plaintiffs,	<u></u>
partment 1 Floor	
Defendants.	
	Plaintiffs,  THAU, epartment n Floor

- 1. I \_\_\_\_\_\_ make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
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DocuSign Envelope ID: 69F876DF-6025-4FBF-9404-F3F92889E947

5. I am suing because some members of the Washington, D.C. Metropolitan Police
Department and a very few members of the U.S. Capitol Police Department initiated excessive
use of force and violence, and I and others were injured psychologically, physically, or
chemically by the Defendants and not as part of actions initiated by the Plaintiff.

Dated: January 8, 2024

Respectfully submitted,

—DocuSigned by:

59E341E492F7427

[If applicable]

By Power of Attorney:

—DocuSigned by

\_\_\_50E341E402F7427

EDWARD JACOB LANG Post Office Box 485 Narrowsburg, NY 12764		Civil Action N	lo.
Et al.	Plaintiffs,		
v.			
SARGEANT DANIEL TH Metropolitan Police Depart 441 4th Street, NW, 7th Flo Washington, DC 20001	ment		
Et al.	Defendants.		

- 1. I \_\_\_\_\_\_ make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
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DocuSign Envelope ID: 09294205-5E33-47A7-A59D-7BDB8D28DE37

5. I am suing because some members of the Washington, D.C. Metropolitan Police
Department and a very few members of the U.S. Capitol Police Department initiated excessive
use of force and violence, and I and others were injured psychologically, physically, or
chemically by the Defendants and not as part of actions initiated by the Plaintiff.

Dated: January 8, 2024

Respectfully submitted,

I am one of the hundreds of thousand of protestors that traveled to Washington DC on January 6th 2021 to watch President Trump give a speech. I arrived at the Presidents speech at approximately 11am though it was delayed for a bit. After Trump's speech where he told us to 'peacefully and patriotically' protest, I headed to the US Capitol Building. At approximately 2:25 pm, I stood on the left side of the main staircase leading up to the Capitol on the West Side of the Capitol lawn.

The crowd stood their peacefully for about 20 minutes before I saw a large about of Riot Geared DC Metro Police officers march through the crowd. At this time, the Capitol & DC Police started to throw tear gas grenades and flash bang munitions into the crowd of static protestors.

They did not give any warning or dispersal order before they started this assault. I was harshly affected by the tear gas and felt like I was choking, that I might stop breathing and lose my life. I was there first as a photo journalist and secondly as an American citizen to pray and document this historic event.

At around 2:57pm approximately, an unidentified officer wearing a body cam slapped my left face while I was recording. No live broadcast from my phone was able to be transmitted so I was capturing photo: and videos to later upload.

At 3:02pm an unknown gentleman and officers said they would be letting people into the capitol building soon. Then without notice around 3:49pm tear gas and pepper spray was discharged. The irritation was overbearing and I had a severe reaction because of my pre existing condition of Asthma. My eyes and face burned and my throat began closing due to an anaphylactic reaction to hot peppers in general.

Around that same time an unknown officer began beating me multiple times in the back after the crow had moved some and I was pushed to the front.

Because of the multiple flash grenades I have suffered loss of hearing bilaterally. Have had PTSD and anxiety anytime I am in public or have the videos shown from that day. The mental and emotional abu has caused me to withdraw from others.

I dully swear these statements to be truthful

Signed

. Nicole Wilson

K. yhush Willson



EDWARD JACOB LANG Post Office Box 485 Narrowsburg, NY 12764	Civil Action No.
Et al. Plaintiffs,	
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001	
Et al. Defendants.	

- 1. I \_\_\_\_\_\_ make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
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- 4. I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

Dated: January 8, 2024

Respectfully submitted,

JUSSE Watson
SAOTDADF5112405

[If applicable]
By Power of Attorney:

Docusigned by:

Jusse Watson
5407DADE5142485

Post	VARD JACOB LANG Office Box 485 rowsburg, NY 12764	Civil Action No.		
Et a	l. Plaintiffs,			
	v.			
Metr 441	RGEANT DANIEL THAU, ropolitan Police Department 4th Street, NW, 7th Floor hington, DC 20001			
Et al	Defendants.			
	ADDITIONAL PLAINTIFF JOINING IN T	HE COMPLAINT		
1.	I make my claim a	as an additional Plaintiff against		
the I	Defendants as alleged in the Complaint, by joining in the a	llegations and claims and demands		
for r	elief of the common Complaint.			
2.	I am suing for my own physical injuries and/or chemic	al gas injuries pro se without a		
lawy	ver, and I do not speak for or represent any of the other Pla	intiffs, and none of the other		
Plair	ntiffs speak for me.			
3.	However, I join the common Complaint to meet the ex	pected statute of limitations		
dead	lline and because filing individual Complaints that are nea	rly the same would not be efficient		
and '	would be confusing and unnecessary extra work.			
4.	I understand that I can hire an attorney to pursue my claims and my lawyer may be able			
to an	mend my own individual Complaint.			

Dated: January 8, 2024

Respectfully submitted,

[If applicable]

By Power of Attorney:

EDWARD JACOB LANG Post Office Box 485 Narrowsburg, NY 12764	Civil Action No.
Et al. Plaintiffs,	<u> </u>
V.	
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001	
Et al.  Defendants.	

- 1. I \_\_\_\_\_\_make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
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DocuSign Envelope ID: F18CD468-9460-4C70-8ECC-882978B713FF

5. I am suing because some members of the Washington, D.C. Metropolitan Police
Department and a very few members of the U.S. Capitol Police Department initiated excessive
use of force and violence, and I and others were injured psychologically, physically, or
chemically by the Defendants and not as part of actions initiated by the Plaintiff.

Dated: January 8, 2024

Respectfully submitted,

Consigned by:

Kenneth J Hamelson

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EDWIND ILCODI ANG

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

ı

Civil Action No.

- 1. I \_\_\_\_\_\_ make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries *pro se* without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
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DocuSign Envelope ID: 8058651C-9C42-481F-B8C1-B44F152894EE

5. I am suing because some members of the Washington, D.C. Metropolitan Police
Department and a very few members of the U.S. Capitol Police Department initiated excessive
use of force and violence, and I and others were injured psychologically, physically, or
chemically by the Defendants and not as part of actions initiated by the Plaintiff.

Dated: January 8, 2024

Respectfully submitted,

-- AB79100001D14E0...

EDWARD JACOB LANG Post Office Box 485 Narrowsburg, NY 12764	Civil Action No.
Et al. Plaintiffs,	
v.	
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001	
Et al. Defendants.	

- 1. I \_\_\_\_\_\_ make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries *pro se* without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
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DocuSign Envelope ID: CADCE169-2306-47EB-BE7B-CC9AC3B9C4EF

5. I am suing because some members of the Washington, D.C. Metropolitan Police
Department and a very few members of the U.S. Capitol Police Department initiated excessive
use of force and violence, and I and others were injured psychologically, physically, or
chemically by the Defendants and not as part of actions initiated by the Plaintiff.

Dated: January 8, 2024

Respectfully submitted,

—87E6C0F3937A483

[If applicable]
By Power of Attorney:

EDWARD JACOB LANG Post Office Box 485 Narrowsburg, NY 12764	Civil Action No.
Et al.	1
Plaintiffs,	
V.	
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001	
Et al.  Defendants.	
ADDITIONAL PLAINTIFF JOINING IN TH	E COMPLAINT
1. I make my claim as	an additional Plaintiff against
the Defendants as alleged in the Complaint, by joining in the alle	gations and claims and demand
for relief of the common Complaint.	
2. I am suing for my own physical injuries and/or chemical	gas injuries pro se without a
lawyer, and I do not speak for or represent any of the other Plain	tiffs, and none of the other
Plaintiffs speak for me.	
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deadline and because filing individual Complaints that are nearly	the same would not be efficient
and would be confusing and unnecessary extra work.	
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to amend my own individual Complaint.

DocuSign Envelope ID: CADCE169-2306-47EB-BE7B-CC9AC3B9C4EF

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Department and a very few members of the U.S. Capitol Police Department initiated excessive
use of force and violence, and I and others were injured psychologically, physically, or
chemically by the Defendants and not as part of actions initiated by the Plaintiff.

Dated: January 8, 2024

Respectfully submitted,

Docusigned by:

[If applicable]
By Power of Attorney:

EDWARD IACODI ANC

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

I

Civil Action No.

- 1. I \_\_\_\_\_\_ make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
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DocuSign Envelope ID: 3D8A52D6-3EA6-4D4E-BA32-DA6A1AF46130

5. I am suing because some members of the Washington, D.C. Metropolitan Police
Department and a very few members of the U.S. Capitol Police Department initiated excessive
use of force and violence, and I and others were injured psychologically, physically, or
chemically by the Defendants and not as part of actions initiated by the Plaintiff.

Dated: January 8, 2024

Respectfully submitted,

days Water thirty

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[If applicable]

EDWARD JACOB I Post Office Box 485 Narrowsburg, NY 12		Civil Action No.
Et al.	Plaintiffs,	-
V.		
SARGEANT DANIE Metropolitan Police 1 441 4th Street, NW, Washington, DC 200	Department 7th Floor	
Et al.	Defendants.	
ADD	ITIONAL PLAINTIFF JOINING I	N THE COMPLAINT

- 1. I Marc Kaplan make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries *pro se* without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- 3. However, I join the common Complaint to meet the expected statute of limitations deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
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Department and a very few members of the U.S. Capitol Police Department initiated excessive
use of force and violence, and I and others were injured psychologically, physically, or
chemically by the Defendants and not as part of actions initiated by the Plaintiff.

Dated: January 8, 2024

Respectfully submitted,

Marc Kaplan

[If applicable]

EDWARD JACOB LANG	- 1 11111111111111111111111111111111111
Post Office Box 485	Civil Action No.
Narrowsburg, NY 12764	
Et al.	5
Plaintiffs,	
v.	
SARGEANT DANIEL THAU,	
Metropolitan Police Department	
441 4th Street, NW, 7th Floor	
Washington, DC 20001	
Et al.	
Defendants.	
ADDITIONAL PLAINTIFF JOINI	NG IN THE COMPLAINT
	NO IN THE COM DAINT
Luke Coffee	

- 1. I \_\_\_\_\_ make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
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DocuSign Envelope ID: CA937B4A-B3E9-4DC7-89F6-048CDB5263CB

5. I am suing because some members of the Washington, D.C. Metropolitan Police
Department and a very few members of the U.S. Capitol Police Department initiated excessive
use of force and violence, and I and others were injured psychologically, physically, or
chemically by the Defendants and not as part of actions initiated by the Plaintiff.

Dated: January 8, 2024

Respectfully submitted,

[If applicable]

EDWARD JACOB I Post Office Box 485 Narrowsburg, NY 12'		 Civil Action No.
Et al.	Plaintiffs,	
V.		
SARGEANT DANIE Metropolitan Police I 441 4th Street, NW, 2 Washington, DC 200	Department 7th Floor	
Et al.	Defendants.	

### SWORN DECLARATION OF INDIVIDUAL STATEMENT OF FACTS of Plaintiff Marc Kaplan

I, the undersigned, hereby declare under oath and penalty of perjury, and hereby state in writing as follows:

- 1. My name is Marc Kaplan
- 2. I am legally competent to make this affidavit. I am over the age of 18 years old.
- 3. I make this affidavit from personal, first-hand knowledge except where I explicitly identify another basis for my understanding, knowledge, and belief.
- 4. I make this affidavit under the laws of the United States of America within its territory.
- 5. I join in this lawsuit and adopt the substance and content of this Complaint as my own suit, and I provide these further details of my personal situation.
- 6. On January 6th of 2021 I, Marc Kaplan, attended President Trump's speech in

#### Washington DC.

- 7. Before the conclusion of his speech I then proceeded to my hotet then to the US Capitol building to peacefully protest.
- 8. Upon arriving to the property I came to a barricade halfway between the street and the building. At that barricade I observed US Capitol police officers being extremely violent and aggressive toward the crowd.
- 9. As I entered the area near the Tower, Flash Bangs, Mace and OC was being shot into the crowd from a line right at the base of the Capital. Old people were praying as they were being maced and crying. I asked them if they wanted help leaving but they said they where here for the spirituality. I proceeded to engage the protest when Patriots alerted an Officer to a weapon.
- 11. The officer broke the line and jumped on the tan 45 cal semi.
- 12. When the officeres saw the communitionand their guy on the ground, they attacked the crowd to get to him, pulled him outwith the weapon. within five minutes they retreated and I have the retreat on video. Thjey went in a small door one by one and allowed advance
- 13. From there I simply waled up the scaffolding and made my way up to the top. Seeing that I could get under the stadium seating, me and one other Patriot went under.
- 14. I look over at him and see him Get hit from OC a large metal canister with a hose. I scream to him does he need me, and then I'm hit. I'm in a maze of scaffolding, Alone, 50 years old and can't breath for the next 10 minute alone. I thought I was dead.
- 15. 10 minutes in, two Patriots from Tennessee save me and pull me out
- 16. Blind and not breathing, they douse me with water, Carry me out onto the white steps and administer milk of magnesia. My wife calls me and tells me to get out of there. I said as soon as I can.
- 17. I try to get out, and too many people were coming in. I couldn't get out.
  I forced my was to a LARGE plastic box blocking the narrow to get onto that landing, Jump
  over it and help a 74 year old woman out of that mess.

- 18. On the way back to my hotel, I video'd antifa headed into the Capital and police refuse it.
- 19. That evening, at 6:55pm I was standing in front of the HILTON near the White house.
- 20. Millie Weaver was with me. Rudy was with me. The DC police came out of a wagon 30-40 of them and said if we did not get into the hotel we were under arrest. We head into the lobby with about 70 Patriots go crazy behind the glass as they use facial recognition on us. We leave the hotel and we are under arrest until the morning. 4 Hotels and I recorded it all.
- 21. I did not witness any vandalism or violence by protestersat the Capitol.
- 22. At that point in time I never once was told to leave or that I was trespassing.
- 23.

- 27. I, Marc Kaplan, swear by these statements as accurate and truthful to the best of my knowledge and belief.
- 28. Not being a lawyer, I cannot swear under oath to legal procedures, laws, or legal conclusions, which I believe to be correct, but I swear only to the facts as I witnessed them.

Dated: January 8, 2024

Respectfully submitted,

Marc Kaplan

Marc Kaplan

EDWARD JACOB LANG Post Office Box 485 Narrowsburg, NY 12764	Civil Action No.
Et al. Plaintiffs,	
V.	
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001	
Et al.  Defendants.	

- 1. I \_\_\_\_\_\_ make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
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5. I am suing because some members of the Washington, D.C. Metropolitan Police
Department and a very few members of the U.S. Capitol Police Department initiated excessive
use of force and violence, and I and others were injured psychologically, physically, or
chemically by the Defendants and not as part of actions initiated by the Plaintiff.

Dated: January 8, 2024

Respectfully submitted,

—DocuSigned by:

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[If applicable]
By Power of Attorney:

-DocuSigned by:

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EDWARD LACORY AND

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

Post Office Box 485 Narrowsburg, NY 12764	Civil Action No.
Et al.  Plaintiffs,  v.	
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001	
Et al.  Defendants.	

- 1. I \_\_\_\_\_\_ make my claim as an additional Plaintiff against the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries *pro se* without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- 3. However, I join the common Complaint to meet the expected statute of limitations deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- 4. I understand that I can hire an attorney to pursue my claims and my lawyer may be able to amend my own individual Complaint.

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5. I am suing because some members of the Washington, D.C. Metropolitan Police
Department and a very few members of the U.S. Capitol Police Department initiated excessive
use of force and violence, and I and others were injured psychologically, physically, or
chemically by the Defendants and not as part of actions initiated by the Plaintiff.

Dated: January 8, 2024

Respectfully submitted,

V CANADADADA

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[If applicable]
By Power of Attorney:

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EDWARD JACOB LANG Post Office Box 485 Narrowsburg, NY 12764	Civil Action No.
Et al. Plaintiffs,	
SARGEANT DANIEL THAU, Metropolitan Police Department 441 4th Street, NW, 7th Floor Washington, DC 20001	
Et al.  Defendants	

- Michael Thomas Curzio \_\_\_\_ make my claim as an additional Plaintiff against 1. the Defendants as alleged in the Complaint, by joining in the allegations and claims and demands for relief of the common Complaint.
- 2. I am suing for my own physical injuries and/or chemical gas injuries pro se without a lawyer, and I do not speak for or represent any of the other Plaintiffs, and none of the other Plaintiffs speak for me.
- 3. However, I join the common Complaint to meet the expected statute of limitations deadline and because filing individual Complaints that are nearly the same would not be efficient and would be confusing and unnecessary extra work.
- I understand that I can hire an attorney to pursue my claims and my lawyer may be able 4. to amend my own individual Complaint.

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5. I am suing because some members of the Washington, D.C. Metropolitan Police
Department and a very few members of the U.S. Capitol Police Department initiated excessive
use of force and violence, and I and others were injured psychologically, physically, or
chemically by the Defendants and not as part of actions initiated by the Plaintiff.

Dated: January 8, 2024

Respectfully submitted,

DocuSigned by:

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[If applicable]