

HONORABLE ROBERT J. BRYAN

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IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

GEORGE DC PARKER II and LORI A.  
PARKER,

Plaintiff(s),

v.

THE SOCIETY FOR CREATIVE  
ANACHRONISM, INC., a/k/a/ "SCA" or  
"SCA, Inc.", et.al,

Defendant(s).

NO. 3:23-cv-05069-RJB

DEFENDANT THE SOCIETY FOR  
CREATIVE ANACHRONISM'S  
ANSWER TO PLAINTIFF'S  
COMPLAINT

COMES NOW Defendant The Society For Creative Anachronism's ("SCA" or "Defendant"), by and through its attorneys of record, Preg O'Donnell and Gillett, and hereby answers as follows.

**I. THE PARTIES TO THIS COMPLAINT**

A. Defendant lacks sufficient information to admit or deny the allegations asserted in paragraph A of Plaintiff's Complaint and therefore denies the same.

B. Admit.

C. Basis for Jurisdiction

1           1.       Defendant lacks sufficient information to admit or deny the allegations asserted in  
2 paragraph 1 of Plaintiff's Complaint and therefore denies the same.

3           2.       Defendant lacks sufficient information to admit or deny the allegations asserted in  
4 paragraph 2 of Plaintiff's Complaint and therefore denies the same.

5           3.       Admit.

6           4.       Paragraph 4 of Plaintiff's Complaint requires no responses. To the extent Paragraph  
7 C. 4 requires any responses, Defendant denies the same.

8           5.       Admit.

9           6.       Defendant denies paragraph 6 as stated. Defendant admits that SCA was  
10 incorporated in 1968 and that An Tir was first recognized in 1973 when it was created as a  
11 Principality. An Tir became a Kingdom in 1982.

12          7.       Defendant lacks sufficient information to admit or deny the allegations asserted in  
13 paragraph 7 of Plaintiff's Complaint and therefore denies the same.

14          8.       Admit.

15          9.       Admit.

16          10.      Defendant denies paragraph 11 as stated. Defendant admits it has over 20,000  
17 members worldwide.

18          11.      Defendant denies paragraph 11 as stated. Defendant admits that there was a  
19 gathering of people on May 1, 1966 that later grew into the SCA which was incorporated in 1968.

20          12.      Admit.

21          13.      Admit.

22

23

1 14. Defendant denies paragraph 14 as stated but admits that the SCA Society Seneschal  
2 manages that administration of SCA's historical recreation and makes interpretations and  
3 clarifications of policies governing historical recreation aspects of SCA.

4 15. Defendant denies paragraph 15 as stated but admits that the SCA Kingdom  
5 Seneschal is an administrative office of the SCA whose tasks include coordinating with other  
6 kingdom officers. Defendant SCA further admits that the seneschal of a Barony is an  
7 administrative office at the local level and can be a representative of the group.

8 16. Defendant denies paragraph 16 as stated but admits that there is a body of  
9 participants known as the "Peerage" who are nominated pursuant to various rules that differ  
10 depending on the kingdom.

11 17. Defendant denies paragraph 17 as stated. Defendant admits names and devices are  
12 submitted to the office of heraldry. The address to which they are mailed varies from kingdom to  
13 kingdom. After vetting at the kingdom level the submissions are forwarded to a deputy at the  
14 corporate office of heralds for submission who goes through a process that includes a check for  
15 conflicts in other kingdoms.

16 18. Defendant denies Plaintiff's Complaint ¶ 18 as stated but admits that the crown of  
17 a kingdom is chosen by the Crown Tourney. The crown has a number of roles and duties that are  
18 executed by the crown during their time in office.

19 **II. STATEMENT OF CLAIM**

20 19. In response to paragraph 19 of Plaintiff's Complaint, Defendant admits that  
21 Plaintiffs George Parker and Lori Parker ("the Parkers") were members of the SCA. To the extent  
22 paragraph 19 differs from the above, Defendant lacks sufficient information to admit or deny the  
23 allegations asserted in paragraph 19 of Plaintiff's Complaint and therefore denies the same

1           20. Defendant admits that Lori Parker was the kingdom YAFA officer for a period of  
2 time under Julia Sempronia and that Julia was replaced by Lenora Trouble. To the extent  
3 paragraph 20 differs from the above, Defendant lacks sufficient information to admit or deny the  
4 allegations asserted in paragraph 20 of Plaintiff's Complaint and therefore denies the same

5           21. Defendant lacks sufficient information to admit or deny the allegations asserted in  
6 paragraph 21 of Plaintiff's Complaint and therefore denies the same.

7           22. Defendant admits that Lenora Trouble sent an email on October 22, 2017  
8 informing Ms. Parker that she is removed from the position of Family Activities Deputy for An  
9 Tir. Defendant lacks sufficient information to admit or deny the remaining allegations asserted in  
10 paragraph 22 of Plaintiff's Complaint and therefore denies the same.

11           23. Defendant lacks sufficient information to admit or deny the allegations asserted in  
12 paragraph 23 of Plaintiff's Complaint and therefore denies the same.

13           24. Defendant lacks sufficient information to admit or deny the allegations asserted in  
14 paragraph 24 of Plaintiff's Complaint and therefore denies the same.

15           25. Defendant admits that Plaintiff's applied to become baron and baroness in  
16 February 2019. Defendant denies that the SCA has no set of rules or guidelines pertaining to  
17 volunteers wishing to serve in any office position. Defendant lacks sufficient information to admit  
18 or deny the remaining allegations asserted in paragraph 25 of Plaintiff's Complaint and therefore  
19 denies the same.

20           26. Defendant lacks sufficient information to admit or deny the allegations asserted in  
21 paragraph 26 of Plaintiff's Complaint and therefore denies the same.

22           27. Defendant lacks sufficient information to admit or deny the allegations asserted in  
23 paragraph 27 of Plaintiff's Complaint and therefore denies the same.

1           28. Defendant denies paragraph 28 of Plaintiff's Complaint as drafted, Defendant  
2 admits Plaintiff reached out to Mike Watkins on July 8, 2019 to ask about the votes and allowance  
3 of voting for multiple candidates. The remainder of the paragraph is denied.

4           29. Defendant denies paragraph 29 of Plaintiff's Complaint as drafted. The SCA has  
5 no corporate policy requiring transcripts of any meetings being provided to anyone. Defendant  
6 lacks sufficient information to admit or deny the remaining allegations asserted in paragraph 30  
7 and therefore denies the same.

8           30. Defendant denies paragraph 30 of Plaintiff's Complaint as drafted. The SCA  
9 admits Plaintiffs emailed Mike Watkins asking to appeal the Crown's decision on their complaint  
10 on or about March 4, 2020, alleging lack of interviews. SCA lacks sufficient information to admit  
11 or deny the remaining allegations asserted in paragraph 30 of Plaintiff's Complaint and therefore  
12 denies the same.

13           31. Defendant admits that the Crown stated via email an intent to prohibit various  
14 parties from posting on the Blatha an Oir official Facebook group for six months. Defendant denies  
15 that SCA corporate policy was violated. To the extent Paragraph 31 differs from the above,  
16 Defendant lacks sufficient information to admit or deny the remaining allegations and therefore  
17 denies the same

18           32. Defendant denies paragraph 30 of Plaintiff's Complaint as drafted. The SCA  
19 admits George Parker emailed Mike Watkins on or about March 15, 2020. The email speaks for  
20 itself but Defendant denies the email contains the questions as alleged. Defendant further admits  
21 Mr. Parker sent an email on April 27, 2020. Defendant lacks sufficient information to admit or  
22 deny the remaining allegations asserted in paragraph 32 of Plaintiff's Complaint and therefore  
23 denies the same

1           33. Defendant lacks sufficient information to admit or deny the allegations asserted in  
2 paragraph 33 of Plaintiff's Complaint and therefore denies the same

3           34. Defendant lacks sufficient information to admit or deny the allegations asserted in  
4 paragraph 34 of Plaintiff's Complaint and therefore denies the same

5           35. Defendant admits that on April 2, 2021, an email was sent followed by a certified  
6 letter on April 8, 2021, to Plaintiff George Parker stating that the Board would review the sanction  
7 and a brief announcement that the exile had occurred was published in the kingdom newsletter as  
8 required by SCA sanction procedures and the kingdom website. To the extent paragraph 35 differs  
9 from the above, Defendant lacks sufficient information to admit or deny the remaining allegations  
10 asserted and therefore denies the same

11           36. Defendant lacks sufficient information to admit or deny the allegations asserted in  
12 paragraph 36 of Plaintiff's Complaint and therefore denies the same

13           37. Defendant admits that Plaintiff wrote the SCA Board asking for an appeal of the  
14 exile, and admits he stated he had a general disability but did not specify a specific disability. SCA  
15 denies that the Board consists solely of peers voted in by other Board Members. At the time  
16 complained of by Plaintiffs one of the Board members was not a peer. Defendant lacks sufficient  
17 information to admit or deny the remaining allegations asserted in paragraph 37 and therefore  
18 denies the same

19           38. Denied. An email was sent by George Parker on April 8, 2021, providing his  
20 position. That email was treated as an appeal and he was told how he could submit supplemental  
21 information if he desired to.

22           39. Defendant admits paragraph 39 with the correction that the notice occurred on July  
23 25, 2021.

1 40. Defendant admits there was a transposition error in the email address used for  
2 Plaintiff and Plaintiff was advised of this. To the extent paragraph 40 differs from the above,  
3 Defendant lacks sufficient information to admit or deny the remaining allegations asserted and  
4 therefore denies the same

5 41. Defendant admits that Plaintiff was offered the choice of a phone call, a video call  
6 or email correspondence to provide his statements and information as part of the investigation. Mr.  
7 Parker chose to provide a response via email. Defendant further admits the quote “aggressively  
8 adversarial” was used but is being used out of context in the Complaint. To the extent paragraph  
9 41 differs from the above, Defendant denies the same.

10 42. Defendant admits the appeal and various documents were submitted on January 15,  
11 2022, to the Board and that the appeal was put on the agenda for the Board’s conference call of  
12 February 28, 2022. The meeting minutes for that meeting reflect that by consensus the Board  
13 declined to hear the appeal. To the extent Paragraph 42 differs from the above, Defendants deny  
14 the same.

15 43. Defendant admits Plaintiff emailed Lis Schraer on March 12, 2022, and admits Ms.  
16 Schraer responding that she could not communicate directly with Plaintiff Lori Parker since she  
17 was not the sanctioned individual. Defendants denies the remainder of Paragraph 43.

18 44. Defendants admit that Plaintiffs asked for a second appeal and that his request was  
19 denied. To the extent Paragraph 44 differs from the above, Defendant denies the same.

20 **COUNT I – NEGLIGENCE**

21 45. Defendant acknowledges Plaintiffs reincorporation of paragraphs 1-44 and  
22 reasserts its answers to these paragraphs here.

23 46. (a) – (u) Defendant denies Paragraph 46 and subparts (a)-(u) to Paragraph 46.

1 47. Deny.

2 48. Paragraph 48 calls for legal conclusions for which no answer is required by  
3 Defendant. To the extent an answer is required, Defendant denies the same.

4 49. Deny.

5 50. Deny.

6 51. Deny.

7 52. Deny.

8 53. Deny.

9 54. Deny.

10 55. Deny.

11 56. Deny.

12 **COUNT II – NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**

13 57. Defendant acknowledges Plaintiffs reincorporation of paragraphs 1-56 and  
14 reasserts its answers to these paragraphs here.

15 58. Paragraph 58 calls for legal conclusions for which no answer is required by  
16 Defendant. To the extent an answer is required, Defendant denies the same.

17 59. Deny.

18 60. Deny.

19 **COUNT III – INJUNCTIVE RELIEF**

20 61. Defendant acknowledges Plaintiffs reincorporation of paragraphs 1-60 and  
21 reasserts its answers to these paragraphs here.

22 62. Deny.

23



1 63. Defendant denies paragraph 63 as stated but Defendant does admit that Plaintiffs  
2 were members of SCA in good standing for a number of years. Defendants lacks sufficient  
3 information to admit or deny the remaining allegations asserted in paragraph 63 of Plaintiff's  
4 Complaint and therefore denies the same.

5 64. Paragraph 64 calls for legal conclusions for which no answer is required by  
6 Defendant. To the extent an answer is required, Defendant denies the same.

7 65. Defendants lacks sufficient information to admit or deny the remaining allegations  
8 asserted in paragraph 65 of Plaintiff's Complaint and therefore denies the same.

9 66. Deny.

10 67. Deny.

11 68. Deny.

### 12 III. RELIEF

13 Defendant SCA denies Plaintiffs' prayer for relief including subparts a-z. SCA  
14 additionally denies all allegations not specifically address elsewhere herein.

### 15 IV. CERTIFICATE AND CLOSING

16 Defendant acknowledges Plaintiffs' Certificate and Closing. No further answer is required.

### 17 V. AFFIRMATIVE DEFENSES

18 Defendant re-alleges all admissions, denials and allegations pleaded above and further  
19 asserts the following affirmative defenses.

- 20 1. Some or all of Plaintiffs claims are barred by the statute of limitations.
- 21 2. Plaintiffs have failed to state a claim for which relief can be granted.
- 22 3. Defendant complied with its policies and procedures.
- 23 4. Plaintiffs failed to exhaust their administrative remedies.

1 5. Plaintiffs have assumed the risk of their actions.

2 6. Plaintiffs has failed to mitigate their alleged damages.

3 7. Plaintiffs were treated in a manner comparable to other persons and members of  
4 SCA.

5 8. Plaintiffs' allegations are directed to the conduct of third-parties over whom the  
6 Defendant has no control.

7 9. Plaintiffs are not employees of SCA.

8 10. The statute of limitations bars some or all of Plaintiffs' alleged claims.

9 11. Damages must be apportioned pursuant to RCW 4.22.070.

10 12. Non-parties are at-fault as alleged in Plaintiffs' Complaint, and damages must be  
11 apportioned to the individual non-parties identified by Plaintiffs that include the individuals  
12 whom Plaintiffs claim made comments directed towards them on the various Facebook pages.

13 13. Damages, if any, sustained by Plaintiffs were proximately caused by persons other  
14 than Defendant and Defendant has no legal liability, either direct or vicarious.

15 **VI. DEFENDANT'S RESERVATION OF RIGHTS**

16 Without waiving any affirmative defenses or claims, Defendant reserves the right to amend  
17 this Answer and add additional affirmative defenses, cross claims, third-party claims, and  
18 additional parties as investigation and discovery requires.

19 **VII. DEFENDANT'S PRAYER FOR RELIEF**

20 WHEREFORE having fully answered the allegations contained in Plaintiffs'  
21 Complaint for Damages, Defendant prays for the following relief:

22 1. That Plaintiff's Complaint be dismissed with prejudice;



**DECLARATION OF SERVICE**

I hereby declare that on this day I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the attorneys of record listed below:

**Plaintiffs Pro Se George DC Parker II**

**and Lori A. Parker:**

George DC Parker II  
Lori A. Parker  
10710 199th Street East  
Graham, WA 98338

- Via Messenger
- Via Facsimile –
- Via U.S. Mail, postage prepaid
- Via Overnight Mail, postage prepaid
- Via Court E-Service or email with recipient’s approval  
*thenorsegypsyforge@gmail.com*

DATED at Seattle, Washington, this 2nd day of June, 2023.

/s/ Justin E. Bolster  
Justin E. Bolster, WSBA #38198