UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

DISTRICT OF COLUMBIA,
400 6th Street, N.W, 10th Floor
Washington, D.C. 20001,

Plaintiff,

v.

PROUD BOYS INTERNATIONAL, L.L.C.,
108 Durango Dr.
Aubrey, TX 76227,

OATH KEEPERS,
5130 Fort Apache Rd.
Las Vegas, NV 89148,

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

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

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

THOMAS EDWARD CALDWELL,
274 Wadesville Rd.
Berryville, VA 22611,

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

Case No. _____

JURY TRIAL DEMANDED

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

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

NICHOLAS DECARLO,
712 SW Sunset Ln.
Burleson, TX 76028-5220,

CHARLES DONOHOE,
2840 Cole Rd.,
Winston Salem, NC 27107-4510,

KENNETH HARRELSON,
2885 Saint Marks Dr.
Titusville, FL 32780-6743,

ARTHUR JACKMAN,
4030 N. Econlockhatchee Trail
Orlando, Fl. 32817-1327,

JOSHUA JAMES,
1463 Brashiers Chapel Rd.
Arab, AL 35016-2727,

JONATHANPETER KLEIN,
25180 SW Labrousse Rd.
Sherwood, OR 97140-8807,

CHRISTOPHER KUEHNE,
16657 S. Chalet Dr.
Olathe, KS 66062-2513,

CONNIE MEGGS,
14100 SW 101St LN.
Dunnellon, FL 34432-4700,

KELLY MEGGS,
14100 SW 101St LN.
Dunnellon, FL 34432-4700,

ROBERTO A. MINUTA,
120 Gray LN.,
Prosper, TX 75078-3010,

ETHAN NORDEAN,
31930 169th Ave. SE
Auburn, WA 98092,

NICHOLAS ROBERT OCHS,
3245 Virginia St
Apt 56,
Miami, FL 33133-5250,

BENNIE ALVIN PARKER,
1170 Essex Gln.
Morrow, OH 45152-8486,

SANDRA RUTH PARKER,
1170 Essex Gln.
Morrow, OH 45152-8486,

WILLIAM JOSEPH PEPE,
85 Judson St.
Apt. 2
Beacon, NY 12508,

DOMINIC PEZZOLA,
4039 Lake Ave.
Rochester, NY 14612,

ZACHARY REHL,
3058 Almond St.
Philadelphia, PA 19134-5028,

JON RYAN SCHAFFER,
5162 Timber Ridge Dr.

Columbus, IN 47201-8816,

DANIEL LYONS SCOTT,
122 W Perry LN
Englewood, FL 34223-2943,

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

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

JESSICA MARIE WATKINS,
2586 Hickory Mill Dr.
Hilliard, OH 43026-9464,

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

GRAYDON YOUNG,
7147 Lago St.,
Sarasota, FL 34241

AND

JOHN AND JANE DOES 1-50

Defendants.

COMPLAINT

1. The District of Columbia (the "District") brings this action against Proud Boys International, L.L.C. ("Proud Boys" or "PBI"), the Oath Keepers ("Oath Keepers"), their leadership, certain of their members, and others, for conspiring to terrorize the District by planning,

promoting, and participating in the violent January 6, 2021, attack on the United States Capitol Building (the "Capitol").

NATURE OF THIS ACTION

2. Following the 2020 Presidential Election, two organizations—the Proud Boys and the Oath Keepers—through and with their leadership and certain members and affiliates, conspired to commit acts of violence and attack the United States Congress on January 6, 2021 (the "January 6th Attack" or the "Attack"), with the express purpose of preventing members of Congress and then Vice President Michael Pence from discharging their official constitutional duties and declaring Joseph Biden the winner of the 2020 Presidential Election.

3. Over the course of several weeks, the Proud Boys, the Oath Keepers, their leadership, and certain of their members and affiliates—motivated by a desire to overturn the legal results of the election and initiate a second term of Donald Trump's presidency—worked together to plot, publicize, recruit for, and finance their planned attack.

4. The result of that planning, the January 6th Attack on the Capitol, was not a protest or a rally. It was a coordinated act of domestic terrorism.

5. Would-be insurgents from across the country came to the District, marched through its streets, and ultimately gathered at the United States Capitol, ready and eager to carry out a violent attack on the lawful operation of government.

6. Then, as the Proud Boys, the Oath Keepers, their leadership, and certain of their members and affiliates had planned, Defendants and others rioted, broke through police barricades, and physically forced their way into the Capitol. In doing so, they threatened, assaulted, and injured those who tried to stop them, including officers of the District's Metropolitan Police

Department ("MPD"), and incited terror among those inside and around the building, including members of Congress who were discharging the official duties of their offices.

7. In the wake of this assault, the Capitol was left in shambles, with the District left to deal with the aftermath of the violent disruption to what should have been the peaceful transition of presidential power.

8. Through this action, the District seeks to hold the Defendants accountable under federal laws and the laws of the District of Columbia for the actions committed in furtherance of their conspiracy. The District seeks compensatory, statutory, and punitive relief, and, by filing this action, intends to make clear that it will not countenance the use of violence against the District, including its police officers.

PARTIES

9. **Plaintiff District of Columbia**: The District is a municipal corporation and is the local government for the territory constituting the permanent seat of the government of the United States. The District is represented by and through its chief legal officer, the Attorney General for the District of Columbia. The Attorney General has general charge and conduct of all legal business of the District and all suits initiated by and against the District and is responsible for upholding the public interest. D.C. Code § 1-301.81(a)(1).

10. **Defendant Proud Boys International, L.L.C.**: Proud Boys is a limited liability company organized and existing under the laws of Texas at the time of the actions and events alleged in this Complaint.[1] PBI was created to "establish, maintain, govern, improve and promote

[1] In February 2021, after it was sued for another violent attack on a church in the District that preceded the January 6th Attack, PBI's officers sought to evade service by purporting to dissolve the entity. Under Texas law, PBI continues to exist for three years from the time its officers filed papers with the Texas government to dissolve the entity. *See* TEX. BUS. ORGS. CODE ANN. § 11.356 (West). Therefore, for purposes of this action, PBI remains a limited liability company organized and existing under the laws of Texas.

the welfare of a fraternal order to be known as the 'Proud Boys.'" The Proud Boys is a U.S.-based group that promotes and engages in political violence, including in service of its hate-motivated agenda. PBI is a citizen of Florida, Texas, Colorado, Georgia, Michigan, and Canada.[2]

11. **Defendant Oath Keepers**: The Oath Keepers is a nonprofit corporation incorporated in Nevada, with its principal place of business in Granbury, Texas. The Oath Keepers is a militia movement group united by baseless conspiracy theories arising from the idea that the federal government has been coopted by a nefarious group that is trying to strip United States citizens of their rights.

Individual Defendants

12. **Defendant Ryan Ashlock**: Ashlock is a resident and citizen of the state of Kansas. Ashlock is a member of the Proud Boys. Ashlock was criminally charged and indicted for his role in perpetrating the January 6th Attack in *US* v. *Kuehne*, No. 1:21-cr-00160-TJK, (D.D.C 2021). The Criminal Complaint (Dkt. 5), Affidavit in Support (Dkt. 5-1), and Kuehne, et al. Indictment (Dkt. 29) filed against Ashlock are publicly available documents that are hereby incorporated into the Complaint by reference.[3]

13. **Defendant Joseph Randall Biggs**: Biggs, also known as "Sergeant Biggs," is a resident and citizen of the state of Florida. Biggs is a member of the Proud Boys. Biggs was criminally charged and indicted for his role in perpetrating the January 6th Attack in *US* v. *Nordean*, No. 1:21-cr-00175-TJK (D.D.C. 2021). The Criminal Complaint (Dkt. 1), Affidavit in

[2] As a limited liability company, PBI's citizenship is determined by the citizenship of its members. PBI's members are the eight Proud Boys "brothers" who are elected by the membership of the Proud Boys fraternal order to lead the organization as "Elders." The Proud Boys' bylaws list the first chapter of Elders as including Enrique Tarrio of Florida, Joshua Hall of Texas, Ethan Nordean of Washington, Lucas Rohlfing of Colorado, Heath Hair of Georgia, Harry Fox of Michigan, Timothy Kelley of Canada, and Patrick William Roberts of Colorado.

[3] The documents incorporated by reference can be found at https://statesuniteddemocracy.org/legal/dcvproudboys-info-legal/, where they are identified by the paragraph number in this Complaint in which they appear.

Support (Dkt. 1-1), and Nordean, et al. First Superseding Indictment (Dkt. 26) filed against Biggs are publicly available documents that are hereby incorporated into the Complaint by reference.

14. **Defendant Marc Anthony Bru**: Bru is a resident and citizen of the state of Washington. Bru is a member of the Proud Boys. Bru was criminally charged and indicted for his role in perpetrating the January 6th Attack in *US* v. *Bru*, No. 1:21-cr-00352-JEB (D.D.C 2021). The Criminal Complaint (Dkt. 1), accompanying Statement of Facts (Dkt. 1-1), and Indictment (Dkt. 12) filed against Bru are publicly available documents that are hereby incorporated into the Complaint by reference.

15. **Defendant Thomas Edward Caldwell**: Caldwell is a resident and citizen of the state of Virginia. Caldwell is an affiliate or member of the Oath Keepers. Caldwell was criminally charged and indicted for his role in perpetrating the January 6th Attack in *US* v. *Caldwell*, No. 1:21-cr-00028-APM (D.D.C. 2021). The Watkins, et al. Amended Complaint (Dkt. 1), Affidavit in Support (Dkt 1-1), and Caldwell, et al. Fifth Superseding Indictment (Dkt. 328) filed against Caldwell are publicly available documents that are hereby incorporated into the Complaint by reference.

16. **Defendant William Chrestman**: Chrestman is a resident and citizen of the state of Kansas. Chrestman is a member of the Proud Boys. Chrestman was criminally charged and indicted for his role in perpetrating the January 6th Attack in *US* v. *Kuehne*, No. 1:21-cr-00160-TJK (D.D.C. 2021). The Criminal Complaint, Affidavit in Support, and Kuehne, et al. Indictment (Dkt. 29) filed against Chrestman are publicly available documents that are hereby incorporated into the Complaint by reference.

17. **Defendant Louis Enrique Colon**: Colon is a resident and citizen of the state of Missouri. Colon is a member or affiliate of the Proud Boys. Colon was criminally charged and

indicted for his role in perpetrating the January 6th Attack in *US* v. *Kuehne*, No. 1:21-cr-00160-TJK (D.D.C. 2021). The Kuehne, et al. Criminal Complaint, Affidavit in Support, and Kuehne, et al. Indictment (Dkt. 29) filed against Colon are publicly available documents that are hereby incorporated into the Complaint by reference.

18. **Defendant Donovan Ray Crowl**: Crowl is a resident and citizen of the state of Ohio. Crowl is a member of the Oath Keepers. Crowl was criminally charged and indicted for his role in perpetrating the January 6th Attack in *US* v. *Caldwell*, No. 1:21-cr-00028-APM (D.D.C. 2021). The Watkins, et al. Amended Complaint (Dkt. 1), Affidavit in Support (Dkt 1-1), and Caldwell, et al. Fifth Superseding Indictment (Dkt. 328) filed against Crowl are publicly available documents that are hereby incorporated into the Complaint by reference.

19. **Defendant Nicholas DeCarlo**: DeCarlo, also known as "Nick DeCarlo" or "Nick Lambaste," is a resident and citizen of the state of Texas. DeCarlo is a member or affiliate of the Proud Boys. DeCarlo was criminally charged and indicted for his role in perpetrating the January 6th Attack in *US* v. *DeCarlo*, No. 1:21-cr-00073-BAH (D.D.C. 2021). The Criminal Complaint (Dkt. 1), accompanying Statement of Facts (Dkt. 1-1), and Indictment (Dkt. 17) filed against DeCarlo are publicly available documents that are hereby incorporated into the Complaint by reference.

20. **Defendant Charles Donohoe**: Donohoe is a resident and citizen of the state of North Carolina. Donohoe is a member of the Proud Boys. Donohoe was criminally charged and indicted for his role in perpetrating the January 6th Attack in *US* v. *Nordean*, No. 1:21-cr-00175-TJK (D.D.C. 2021). The Nordean, et al. First Superseding Indictment (Dkt. 26) filed against Donohoe is a publicly available document that is hereby incorporated into the Complaint by reference.

21. **Defendant Kenneth Harrelson**: Harrelson is a resident and citizen of the state of Florida. Harrelson is a member of the Oath Keepers. Harrelson was criminally charged and indicted for his role in perpetrating the January 6th Attack in *US* v. *Caldwell*, No. 1:21-cr-00028-APM (D.D.C. 2021). The Criminal Complaint (Dkt. 1), Statement of Facts (Dkt. 1-1), and Caldwell, et al. Fifth Superseding Indictment (Dkt. 328) filed against Harrelson are publicly available documents that are hereby incorporated into the Complaint by reference.

22. **Defendant Arthur Jackman**: Jackman is a resident and citizen of the state of Florida. Jackman is a member of the Proud Boys. Jackman was criminally charged and indicted for his role in perpetrating the January 6th Attack in *US* v. *Jackman*, No. 1:21-cr-00378-TJK (D.D.C. 2021). The Criminal Complaint (Dkt. 1), Affidavit in Support (Dkt. 1-1), and Superseding Indictment (Dkt. 23) filed against Jackman are publicly available documents that are hereby incorporated into the Complaint by reference.

23. **Defendant Joshua James**: James is a resident and citizen of the state of Alabama. James is a member of the Oath Keepers. James was criminally charged and indicted for his role in perpetrating the January 6th Attack in *US* v. *Caldwell*, No. 1:21-cr-00028-APM (D.D.C. 2021). The Criminal Complaint (Dkt. 1), Affidavit in Support (Dkt. 1-1), and Caldwell, et al. Fifth Superseding Indictment (Dkt. 328) filed against James are publicly available documents that are hereby incorporated into the Complaint by reference.

24. **Defendant Jonathanpeter Klein**: Klein is a resident and citizen of the state of Oregon. Klein is a member of the Proud Boys. Klein was criminally charged and indicted for his role in perpetrating the January 6th Attack in *US* v. *Klein*, No. 1:21-cr-00237-RDM (D.D.C. 2021). The Indictment (Dkt. 1) filed against Klein is a publicly available document that is hereby incorporated into the Complaint by reference.

25. **Defendant Christopher Kuehne**: Kuehne is a resident and citizen of the state of Kansas. Kuehne is a member or affiliate of the Proud Boys. Kuehne was criminally charged and indicted for his role in perpetrating the January 6th Attack in *US* v. *Kuehne*, No. 1:21-cr-00160-TJK (D.D.C. 2021). The Kuehne et al. Criminal Complaint, Affidavit in Support, and Kuehne, et al. Indictment (Dkt. 29) are publicly available documents that are hereby incorporated into the Complaint by reference.

26. **Defendant Connie Meggs ("C. Meggs")**: C. Meggs is a resident and citizen of the state of Florida. C. Meggs is a member of the Oath Keepers. C. Meggs was criminally charged and indicted for her role in perpetrating the January 6th Attack in *US* v. *Caldwell*, No. 1:21-cr-00028-APM (D.D.C. 2021). The Meggs et al. Criminal Complaint (Dkt. 1), Affidavit in Support (Dkt. 1-1), and Caldwell, et al. Fifth Superseding Indictment (Dkt. 328) filed against C. Meggs are publicly available documents that are hereby incorporated into the Complaint by reference.

27. **Defendant Kelly Meggs ("K. Meggs")**: K. Meggs is a resident and citizen of the state of Florida and is the self-described leader of the Florida chapter of the Oath Keepers. K. Meggs was criminally charged and indicted for his role in perpetrating the January 6th Attack in *US* v. *Caldwell*, No. 1:21-cr-00028-APM (D.D.C. 2021). The Meggs et al. Criminal Complaint (Dkt. 1), Affidavit in Support (Dkt. 1-1), and Caldwell, et al. Fifth Superseding Indictment (Dkt. 328) filed against K. Meggs are publicly available documents that are hereby incorporated into the Complaint by reference.

28. **Defendant Roberto A. Minuta**: Minuta is a resident and citizen of the state of Texas. Minuta is a member of the Oath Keepers. Minuta was criminally charged and indicted for his role in perpetrating the January 6th Attack in *US* v. *Caldwell*, No. 1:21-cr-00028-APM (D.D.C. 2021). The Criminal Complaint (Dkt. 1), Affidavit in Support (Dkt. 1-1), and Caldwell, et al. Fifth

Superseding Indictment (Dkt. 328) filed against Minuta are publicly available documents that are hereby incorporated into the Complaint by reference.

29. **Defendant Ethan Nordean**: Nordean, also known as "Rufio Panman," is a resident and citizen of the state of Washington. Nordean is the self-described "Sergeant-at-Arms" of the Seattle chapter of the Proud Boys. Nordean was criminally charged and indicted for his role in perpetrating the January 6th Attack in *US* v. *Nordean et al*., No. 1:21-cr-00175-TJK (D.D.C. 2021). The Criminal Complaint (Dkt. 6), Affidavit in Support (Dkt. 6-1), and Nordean, et al. First Superseding Indictment (Dkt. 26) filed against Nordean are publicly available documents that are hereby incorporated into the Complaint by reference.

30. **Defendant Nicholas Robert Ochs**: Ochs is a resident and citizen of the state of Hawaii. Ochs is a founding member of the Proud Boys Hawaii chapter. Ochs was criminally charged and indicted for his role in perpetrating the January 6th Attack in *US* v. *DeCarlo*, No. 1:21-cr-00073-BAH (D.D.C. 2021). The Criminal Complaint (Dkt. 1), Affidavit in Support (Dkt. 1-1), and Indictment (Dkt. 17) filed against Ochs are publicly available documents that are hereby incorporated into the Complaint by reference.

31. **Defendant Bennie Alvin Parker ("B. Parker")**: B. Parker is a resident and citizen of the state of Ohio. B. Parker is a member or affiliate of the Oath Keepers. B. Parker was criminally charged and indicted for his role in perpetrating the January 6th Attack in *US* v. *Caldwell*, No. 1:21-cr-00028-APM (D.D.C. 2021). The Criminal Complaint (Dkt. 1), Affidavit in Support (Dkt. 1-1), and Caldwell, et al. Fifth Superseding Indictment (Dkt. 328) filed against B. Parker are publicly available documents that are hereby incorporated into the Complaint by reference.

32. **Defendant Sandra Ruth Parker ("S. Parker")**: S. Parker is a resident and citizen of the state of Ohio. S. Parker is a member or affiliate of the Oath Keepers. S. Parker was criminally charged and indicted for her role in perpetrating the January 6th Attack in *US* v. *Caldwell*, No. 1:21-cr-00028-APM (D.D.C. 2021). The Criminal Complaint (Dkt. 1), Affidavit in Support (Dkt. 1-1), and Caldwell, et al. Fifth Superseding Indictment (Dkt. 328) filed against S. Parker are publicly available documents that are hereby incorporated into the Complaint by reference.

33. **Defendant William Joseph Pepe**: Pepe is a resident and citizen of the state of New York. Pepe is a member of the Proud Boys. Pepe was criminally charged and indicted for his role in perpetrating the January 6th Attack in *US* v. *Pezzola*, No. 1:21-cr-00052-TJK (D.D.C. 2021). The Criminal Complaint (Dkt. 1), accompanying Statement of Facts (Dkt. 1-1), and Superseding Indictment (Dkt. 34) filed against Pepe are publicly available documents that are hereby incorporated into the Complaint by reference.

34. **Defendant Dominic Pezzola**: Pezzola, also known as "Spaz" or "Spazzo," is a resident and citizen of the state of New York. Pezzola is a member of the Proud Boys. Pezzola was criminally charged and indicted for his role in perpetrating the January 6th Attack in *US* v. *Pezzola*, No. 1:21-cr-00052-TJK (D.D.C. 2021). The Criminal Complaint (Dkt. 1), Affidavit in Support (Dkt. 1-1), and Superseding Indictment (Dkt. 34) filed against Pezzola are publicly available documents that are hereby incorporated into the Complaint by reference.

35. **Defendant Zachary Rehl**: Rehl is a resident and citizen of the state of Pennsylvania. Rehl is the president of the Philadelphia Proud Boys chapter, and a member of the Proud Boys. Rehl was criminally charged and indicted for his role in perpetrating the January 6th Attack in *US* v. *Nordean*, No. 1:21-cr-00175-TJK (D.D.C. 2021). The Nordean, et al. First

Superseding Indictment (Dkt. 26) filed against Rehl is a publicly available document that is hereby incorporated into the Complaint by reference.

36. **Defendant Jon Ryan Schaffer**: Schaffer is a resident and citizen of the state of Indiana. Schaffer is a founding, lifetime member of the Oath Keepers. Schaffer was criminally charged and indicted for his role in perpetrating the January 6th Attack in *US* v. *Schaffer*, No. 1:21-cr-00306-APM (D.D.C. 2021). In connection with a promise to cooperate with investigators and potentially testify in criminal cases related to the conspiracy to commit the January 6th Attack, Schaffer pleaded guilty to the entire Statement of Offense in the criminal action brought against him, which included two felony offenses: (1) trespass of the Capitol while armed with a deadly or dangerous weapon and (2) obstruction of an official proceeding of Congress. The Criminal Complaint (Dkt. 1) filed against Schaffer—as well as Schaffer's Plea Agreement (Dkt. 29) and the accompanying Statement of Offense (Dkt. 30) describing his conduct—are publicly available documents that are hereby incorporated into the Complaint by reference.

37. **Defendant Daniel Lyons Scott**: Scott, also known as "Milkshake," is a resident and citizen of the state of Florida. Scott is a member of the Proud Boys and has a tattoo of the organization's name on his upper arm. Scott was criminally charged and indicted for his role in perpetrating the January 6th Attack in *US* v. *Scott*, No. 1:21-cr-00499-EGS (D.D.C. 2021). The Criminal Complaint (Dkt. 1), accompanying Statement of Facts (Dkt. 1-1), and Indictment (Dkt. 18) filed against Scott are publicly available documents that are hereby incorporated into the Complaint by reference.

38. **Defendant Laura Steele**: Steele is a resident and citizen of the state of North Carolina. Steele is a member of the Florida chapter of the Oath Keepers. Steele was criminally charged and indicted for her role in perpetrating the January 6th Attack in *US* v. *Caldwell*, No.

1:21-cr-00028-APM (D.D.C. 2021). The Meggs et al. Criminal Complaint (Dkt. 1), Affidavit in Support (Dkt. 1-1), and Caldwell, et al. Fifth Superseding Indictment (Dkt. 328) filed against Steele are publicly available documents that are hereby incorporated into the Complaint by reference.

39. **Defendant Henry "Enrique" Tarrio**: Tarrio is a resident and citizen of the state of Florida. Tarrio has been a member of the Proud Boys since 2017 and has been the Chairman—the most senior role in, and the face of, the organization—since November 20, 2018. As the Proud Boys' Chairman, Tarrio, in coordination with the Proud Boys Elders, acts as the voice of the organization on matters of public concern, according to the Proud Boys' Bylaws.

40. **Defendant Jessica Marie Watkins**: Watkins is a resident and citizen of the state of Ohio. Watkins is a member of the Oath Keepers. Watkins was criminally charged and indicted for her role in perpetrating the January 6th Attack in *US* v. *Caldwell*, No. 1:21-cr-00028-APM (D.D.C. 2021). The Watkins et al. Criminal Complaint (Dkt. 1), Affidavit in Support (Dkt. 1-1), and Caldwell, et al. Fifth Superseding Indictment (Dkt. 328) filed against Watkins are publicly available documents that are hereby incorporated into the Complaint by reference.

41. **Defendant Christopher John Worrell**: Worrell is a resident and citizen of the state of Florida. Worrell is a member of the Proud Boys. Worrell was criminally charged and indicted for his role in perpetrating the January 6th Attack in *US* v. *Worrell*, No. 1:21-cr-00292-RCL (D.D.C. 2021). The Criminal Complaint (Dkt. 1), accompanying Statement of Facts (Dkt. 1-1), and Indictment (Dkt. 31) filed against Worrell are publicly available documents that are hereby incorporated into the Complaint by reference.

42. **Defendant Graydon Young**: Young is a resident and citizen of the state of Florida. Young is a member of the Florida chapter of the Oath Keepers. Young was criminally charged

and indicted for his role in perpetrating the January 6th Attack in *US* v. *Caldwell*, No. 1:21-cr-00028-APM (D.D.C. 2021). Young subsequently pleaded guilty to the entire Statement of Offense in the criminal action brought against him. The Criminal Complaint (Dkt. 1) and Affidavit in Support (Dkt. 1-1) filed against Young—as well as Young's Plea Agreement (Dkt. 249) and the Statement of Offense (Dkt. 250) describing Young's conduct—are publicly available documents that are hereby incorporated into the Complaint by reference.

43. **Defendants John and Jane Does 1−50**: Upon information and belief, Defendants John and Jane Does 1−50 are individuals whose names and addresses are unknown and who planned, conspired to carry out, and executed the January 6th Attack. The District expressly excludes from John and Jane Does 1−50 any citizens of the District.

44. Defendants Ashlock, Biggs, Bru, Caldwell, Chrestman, Colon, Crowl, DeCarlo, Donohoe, Harrelson, Jackman, James, Klein, Kuehne, C. Meggs, K. Meggs, Minuta, Nordean, Ochs, B. Parker, S. Parker, Pepe, Pezzola, Rehl, Schaffer, Scott, Steele, Tarrio, Watkins, Worrell, Young, and John and Jane Does 1−50 are collectively referenced herein as the "Individual Defendants."

45. As alleged more fully below, the Individual Defendants conspired together and participated in planning, promoting, financing, organizing, and carrying out the January 6th Attack. Defendants Proud Boys and Oath Keepers also participated in the conspiracy, playing a key role in the planning, promotion, financing, organizing, and carrying out of the January 6th Attack by lending their experience—and in some cases, organizational resources—to the planned January 6th Attack.

46. The Defendants are jointly and severally liable for the damages suffered by the District as a result of their unlawful conspiracy.

JURISDICTION AND VENUE

47. The Court has jurisdiction over this action under 28 U.S.C. § 1331 and over the District's state law claims under 28 U.S.C. § 1367.

48. Additionally, and in the alternative, this Court has jurisdiction over this entire action under 28 U.S.C. § 1332 because there is complete diversity among the parties and the amount in controversy exceeds $75,000.

49. Venue is properly in this District pursuant to 28 U.S.C. § 1391(b) because a substantial part of the events giving rise to Plaintiff's claims occurred in this District.

FACTUAL ALLEGATIONS

I. Both the Proud Boys and the Oath Keepers Have a Long History of Inciting and Engaging in Coordinated Violence.

50. The violence perpetrated by the Proud Boys, Oath Keepers, their leadership, and certain of their members and affiliates through the January 6th Attack—while unique in its severity and scope—is far from an isolated occurrence. Violence is an inextricable part of both organizations and a common link between them.

A. The Proud Boys' Organization and History of Violence

51. The Proud Boys is a U.S.-based group that has repeatedly and persistently instigated, incited, and executed acts of violence and intimidation against their perceived enemies. The Canadian government has designated the Proud Boys as a terrorist entity.

52. Violence has been a key component of the Proud Boys' mission and conduct since its creation. PBI's original Constitution and Bylaws, which set forth the rules and procedures governing the Proud Boys fraternal order, mandated that membership be limited to men who undergo violent initiation rituals, including getting beaten by other members. The highest level of membership, for example, required "a material sacrifice or service," which Proud Boys founder

Gavin McInnes has described as getting arrested or committing a violent act in support of the Proud Boys.[4]

53. As a result, when Proud Boys members assemble in large groups at public demonstrations, violence becomes more likely.

54. The Proud Boys members have a long-standing practice of instigating and committing acts of violence under the guise of self-defense by responding to small slights with coordinated, brutal force.

55. For example, on October 12, 2018, 10 men connected to the Proud Boys were arrested following violent attacks on protestors outside of the Metropolitan Republican Club on the Upper East Side of Manhattan. The Proud Boys involved in those attacks punched, kicked, and "stomped" four protestors who were wearing black clothes and masks. The Proud Boys later claimed that their members were assaulted by these protestors, but security camera footage revealed that a Proud Boys member initiated the street violence.

56. Similarly, in April 2019, Proud Boys members used messaging platforms to coordinate and plan violence in advance of an April 2019 rally in Providence, Rhode Island. As one of the Proud Boys instructed before that rally on the encrypted chat service, Telegram: "If any contact is made with you, that's assault. If they take your hat, spray you with silly string, spit, push . . . . It's assault. We need to have all our guys there before we retaliate though if we can. The cops aren't going to let us fight long. We need to inflict as much damage as possible in the time we have."

[4] In October 2018, as law enforcement sought members of the Proud Boys for their role in a fight outside the Metropolitan Republican Club, Proud Boys leadership released a "clarified" set of bylaws that purported to contradict the Proud Boys' prior, violent rhetoric. The new language asserts: "Any requirement that a brother commit a violent or illegal act as a condition precedent to receiving a fourth degree is, by this bylaw, abolished."

57. A few months later, in advance of an August 2019 rally in Portland, Oregon, Defendant Biggs suggested that his cohort arm themselves and be prepared for violence. He posted videos of himself holding a spiked baseball bat, telling the camera: "We're going to put this to good use." He also posed wearing a t-shirt reading: "I'm Just Here for the Violence."

58. On several occasions in August 2020, Proud Boys members violently confronted protestors and others in Portland, Oregon, following the police killing of George Floyd in Minneapolis. The Proud Boys came to the Oregon protests armed with bear mace, clubs, and firearms. Proud Boys members engaged in multiple acts of violence at the protests, including, on August 15, 2020, spraying a journalist with bear mace and, on August 22, 2020, charging and severely beating protestors affiliated with the movement against police brutality.

59. The Proud Boys' acts of violence are often anticipated, instigated, coordinated, and encouraged by those elected to the organization's leadership.

60. Under the group's Bylaws, eight "brothers" are elected by the membership of the Proud Boys fraternal order to lead the organization as "Elders." These eight Elders (together, the "Elders Chapter") are tasked with taking "legal action on behalf of the fraternity," holding "property in the name of the national fraternity and collect[ing] suggested voluntary dues for the benefit of the fraternity or for charity," "establish[ing] organizations, funds or trusts to which both members and non-members of the fraternity could contribute for charitable purposes," and generally serving as "the final authority on chapter status, membership criteria, and rituals of the fraternity."

61. The Elders Chapter is also responsible for electing the "Chairman of the Proud Boys," and, "through the Chairman, serving as the voice of the fraternity as a whole on matters of public concern."

62. The Chairman holds the most senior role in the organization. The Bylaws of PBI vest the Chairman with the sole authority to speak for the Proud Boys fraternal order, which includes PBI, the Elders Chapter, and all other chapters established throughout the country.

63. The Proud Boys' membership is controlled by local chapter leadership that reports to national leaders. While the organization's membership is not publicly disclosed, members frequently self-identify on social media or by appearing at events organized by Proud Boys or their affiliates, often in apparel that displays their affiliation, including clothing in the Proud Boys' official colors, black and yellow.

B. The Oath Keepers' Organization and History of Violence.

64. Oath Keepers is a militia movement group united by the view that the federal government has been coopted by a nefarious group trying to strip United States citizens of their rights.

65. Oath Keepers and its members galvanize their supporters by perpetuating perceived threats posed by the federal government, including that the federal government will use a major destabilizing event—like a pandemic or terrorist attack—as an excuse to institute martial law, force citizens into detention camps, and strip them of their right to keep and bear arms in order to enslave them under a one-world socialist government, which its members refer to as the "The New World Order."

66. Oath Keepers and its members present themselves as a bulwark and a militia against these imagined and manufactured threats. The group's members are known for being heavily armed, and for being willing to engage in armed confrontations with the government and with people and groups they perceive as supporting government actions, including people who have political beliefs that differ from those of Oath Keepers.

67. The rules and procedures governing Oath Keepers are set forth in the group's Bylaws.

68. Oath Keepers leadership—including the Board of the Oath Keepers, which is made up of the founder of the organization, Stewart Rhodes, and at least 10 additional trustees—has repeatedly urged its members to be prepared to fight in what they perceive to be an impending civil war.

69. In addition to national leadership, on the local level, many Oath Keepers self-organize and form official, semi-official, or informal groupings of Oath Keepers. Rhodes described the "action arm of the Oath Keepers" to be county-level and urged local militias to self-organize.

70. Oath Keepers members and affiliates often demonstrate their commitment to the organization by evincing a willingness to engage in armed confrontation. One Oath Keepers member justified the use of these tactics, noting: "I like to use the Revolutionary War as an example. The militias were there, well-armed and organized, not looking to pick a fight but ready when it happened."

71. Like members and affiliates of the Proud Boys, members and affiliates of Oath Keepers have been arrested in connection with, and convicted of, a wide range of violent criminal activities, including various firearms violations, conspiracy to impede federal workers, possession of explosives, and threatening public officials.

72. In 2010, Oath Keepers member Matthew Fairfield was sentenced to 20 years in prison for storing a live napalm bomb at his home and for storing other explosives at his friend's home in Ohio.

73. In 2014, members of Oath Keepers participated in an armed standoff at the Bundy Ranch in Nevada. Members came from Arizona and New Hampshire to take up an armed defense of Cliven Bundy, a Nevada rancher who was defying an order from the federal Bureau of Land Management to remove his animals from federal land. The members of Oath Keepers who joined Bundy aimed their weapons at Bureau of Land Management agents until the agents retreated from the standoff.

74. The same year, members of Oath Keepers came to Ferguson, Missouri, when the city was under a state of emergency after the police shooting of Michael Brown. Oath Keepers members in Ferguson claimed to be protecting private businesses from looting and arson. They took tactical positions on top of buildings while armed with firearms in positions across the city. The group eventually dispersed, but only after local police threatened arrest.

75. Members of Oath Keepers reconvened in Ferguson on the anniversary of Michael Brown's death in 2015, dressed in military garb and openly brandishing firearms in the streets after officials had declared a state of emergency.

76. Also in 2015, a federal grand jury indicted a member of Oath Keepers, Daniel Hayden, for tweeting threats of a violent attack on Oklahoma state government officials, writing "the WAR wWIL [*sic*] start on the stepes [*sic*] of the Oklahoma State Capitol. I will cast the first stone…" and "START THE KILLING NOW!"

77. On August 8, 2018, Oath Keepers announced and began to raise funds for its new "Spartan Training Group," which was established to train as a vigilante force. As Oath Keepers described:

> Our goal is to form training groups in as many states as possible. To join your local training group, membership in Oath Keepers will not be required, but will be encouraged. In the era of the Founding Fathers, they formed "training bands" with the express goal of

> training the public up to the high standards of the militia. The Spartan program is the modern equivalent. Our qualified and experienced military, law enforcement and first responder veterans will train the American people up to a similar high standard. Such individuals will form a pool of trained, organized volunteers who will be able to serve as the local militia under the command of a *patriotic* governor loyal to the Constitution, or if called upon by President Trump to serve the nation.
>
> Short of being called upon by the President, governor, local Sheriff, or to provide disaster relief, members will be trained to serve as volunteer security for local events, churches and effective neighborhood watches for their communities.

78. During the summer of 2020, Oath Keepers leader and founder Stewart Rhodes encouraged members of Oath Keepers to make a showing of force at demonstrations against police brutality. Oath Keepers who attended those events were a self-appointed vigilante force to protect businesses and private property, wearing military gear and carrying weapons in an effort to intimidate the demonstrators.

79. A founding, lifetime member of Oath Keepers—Defendant Jon Ryan Schaffer—was the first person to plead guilty to criminal charges arising from the January 6th Attack. Schaffer pleaded guilty to two felony offenses: (1) trespass of the Capitol while armed with a deadly or dangerous weapon, and (2) obstruction of an official proceeding of Congress.

80. In connection with his plea deal, Schaffer admitted to the contents of a Statement of Offense, which included an admission that he unlawfully entered the Capitol building on January 6th "with the purpose of influencing, affecting, and retaliating against the conduct of government by stopping or delaying the Congressional proceeding by intimidation or coercion."

II. The Proud Boys' and Oath Keepers' Efforts to Incite Coordinated Violence Coalesced around the 2020 Presidential Election.

81. The Proud Boys and Oath Keepers used the lead-up to the 2020 Presidential Election—and the immediate aftermath of former President Donald Trump's loss—to recruit new

members, threaten their detractors with violence, and mobilize forces to engage in acts of violence, including in connection with their ultimate conspiracy to commit the January 6th Attack.

A. Before the Election, the Proud Boys, Oath Keepers, Their Leadership, and Some of Their Members and Affiliates Readied Themselves to Incite Violence.

82. In the weeks leading up to the 2020 Presidential Election, the Proud Boys, Oath Keepers, their leadership, and certain members and affiliates of both groups openly advertised their willingness to use violence to support their political agenda, including their efforts to reelect then-President Trump.

83. On September 29, 2020, during the first presidential debate of his reelection campaign, President Trump specifically addressed the Proud Boys, stating: "Proud Boys, stand back and stand by, but I'll tell you what, somebody's got to do something about Antifa and the left, because this is not a right-wing problem. This is a left-wing problem."

84. During and following the debate, the Proud Boys leadership immediately took to the social media application Parler to show support for a violent response following President Trump's statement.

85. Consistent with the organizational Defendants' plan to leverage President Trump's rhetoric to mobilize the groups' followers, Defendant Biggs, a prominent Proud Boys leader, publicly interpreted President Trump's words on Parler, suggesting that the President's words should be interpreted to encourage violence: "Trump basically said to go fuck them up! [T]his makes me so happy." Proud Boys' Chairman Enrique Tarrio echoed Biggs's sentiment, posting: "Standing by sir."

86. Oath Keepers saw its members as a militia that could be "called forth 'to execute the Laws of the Union, suppress Insurrections and repel Invasions,'" including to preserve former

President Trump's power: "All he has to do is call us up. We WILL answer the call." Consistent with this messaging, Oath Keepers pledged to have "volunteer security teams" at Trump rallies and on Election Day to "protect" Trump voters.

87. Based on past behavior, Oath Keepers members were willing to uphold that pledge using violence. On October 20, 2020, in an online chat room for members of Oath Keepers, members discussed their course of action if President Biden were to be elected. As one member made clear, the plan would include "[c]hoos[ing] a side and fight[ing], looking down the sights of a rifle at our fellow Americans."

88. Oath Keepers publicly trumpeted the idea that members were standing ready to engage in a civil war, tweeting from the group's account: "We ARE on the verge of a HOT civil war. Like in 1859. That's where we are. And the Right has ZERO trust or respect for anything the left is doing. We see THEM as illegitimate too."

B. After the Election, The Proud Boys, Oath Keepers, Their Leadership, and Some of Their Members and Affiliates Used President Trump's Loss to Recruit New Members.

89. On November 4, 2020, President Trump falsely declared that he had won the presidential election, even though a significant number of votes had yet to be counted. On November 7, 2020, most media outlets began projecting President Biden as the winner of the 2020 presidential election.

90. After President Trump's loss, the Proud Boys and Oath Keepers immediately began trumpeting their plans to bring terror and violence to the District and recruiting others to join their efforts.

91. On November 7, 2020, the Proud Boys' Chairman, Enrique Tarrio, posted to Parler, "we're rolling out" and stated that former President Trump's "Standby order has been rescinded."

Also on November 7, 2020, Proud Boys member Daniel Goodwyn, who would eventually join the Defendants on January 6, 2021, posted on Twitter: "Stand back and stand by! Show up at your state Capitol at noon today local time. Await orders from our Commander in Chief. #StopTheSteal!"

92. The Oath Keepers also increased efforts to recruit new members. On November 9, 2020, Oath Keepers member Defendant Watkins sent text messages to individuals who had expressed interest in joining the paramilitary group she formed, which she called the "Ohio State Regular Militia." In these messages, Watkins stated, among other things, that the militia had a week-long "Basic Training class coming up in the beginning of January," and Watkins told one recruit, "I need you fighting fit by innaugeration [*sic*]." Watkins told another individual: "It's a military style basic, here in Ohio, with a Marine Drill Sergeant running it." The same day, Watkins also asked a recruit to download Zello, an app that allows a cellphone to operate like a push-to-talk walkie-talkie, saying her group uses it "for operations."

93. Also on November 9, 2020, several Oath Keepers members attended an online meeting on GotoMeeting where Oath Keepers leader Rhodes said: "We're going to defend the president, the duly elected president, and we call on him to do what needs to be done to save our country. Because if you don't guys, you're going to be in a bloody, bloody civil war, and a bloody – you can call it an insurrection or you can call it a war or fight." Rhodes further called upon his followers to go to the District to let President Trump know "that the people are behind him." He continued, "I do want some Oath Keepers to stay on the outside, and to stay fully armed and prepared to go in armed, if they have to. . . . So our posture's gonna be that we're posted outside of DC, um, awaiting the President's orders. . . . We hope he will give us the orders. We want him to declare an insurrection, and to call us up as the militia."

94. Oath Keepers member Hackett and Defendants Harrelson, Watkins, K. Meggs, and others attended the meeting hosted by Rhodes. After Rhodes finished speaking, Watkins and K. Meggs asked questions and made comments about the types of weapons that were legal in the District of Columbia. The same day, K. Meggs posted on Facebook, lamenting that he saw people "talking" but not "doing." K. Meggs invited others to contact him if they wished to "join the fight": "This fight is face to face, not far away. If your [*sic*] ready to really join the fight [direct message] me."

95. On November 16, 2020, Defendant Nordean posted that "[a]ny militia groups" in the Pacific Northwest area should contact him on an encrypted social media application to coordinate.

96. On November 17, 2020, an Oath Keepers' recruit asked Defendant Watkins what she thought would happen in 2021. Watkins responded that "Biden may still yet be our President. If he is, our way of life as we know it is over. Our Republic would be over. Then it is our duty as Americans to fight, kill, and die for our rights."

97. On November 23, 2020, Defendant Caldwell sent a text message to Defendant Watkins previewing the violence to come. Caldwell remarked: "I don't know what will happen but like you I am very worried about the future of our country." He continued: "I believe we will have to get violent to stop this, especially the antifa maggots who are sure to come out en masse even if we get the Prez for 4 more years. Stay sharp and we will meet again. You are my kinda person and we may have to fight next time. . . ."

98. On December 3, 2020, Defendant Young emailed a membership application to the Oath Keepers' Florida chapter, writing that he was "looking to get involved in helping." Another Oath Keeper, Joseph Bernard Hackett, responded on December 19, 2020, stating: "I believe we

only need to do this when important info is at hand like locations, identities, Ops planning." Hackett attached a photo to the email of a notepad with cursive writing stating: "Secure Comms Test. Good talk tonight guys! Rally Point in Northern Port Charlotte at Grays if transportation is possible. All proton mails [(a type of encrypted email service)]. May consider a [rally point] that won't burn anyone. Comms – work in progress. Messages in cursive to eliminate digital reads. Plans for recruitment and meetings."

99. On December 19, 2020, Young started to recruit new Oath Keepers members himself, posting in a Facebook group: "Please check out Oath Keepers as a means to get more involved. Recruiting is under way. [Direct message] me if you want more info."

C. The Proud Boys, Oath Keepers, Their Leadership, and Certain of Their Members and Affiliates Used Coordinated Violence at Post-Election Events to Intimidate the Public and the Government.

100. The Proud Boys' and Oath Keepers' coordination efforts escalated with both groups mobilizing large forces to wreak havoc on the District at post-election events that previewed the January 6th Attack.

101. The first of these events was the "Million MAGA March," which was held on November 14, 2020, and attended by Oath Keepers, Proud Boys, and members and affiliates from both groups. Violent clashes between self-identified Proud Boys members and protestors broke out that night.

102. The violence increased at the next event: the "Stop the Steal" rally held on December 12, 2020. Oath Keepers and Proud Boys attended the rally in droves. In one particularly disturbing incident on the National Mall, a large group of Proud Boys surrounded a man and punched and kicked him.

103. After engaging in violence against protestors, law enforcement, and others, the Proud Boys fanned out across the city to steal and deface anti-racism signs that had been posted by District residents and businesses. They publicly vandalized and destroyed these signs—including at least one that Defendant Tarrio took credit for lighting on fire—while their supporters celebrated. *See* Figure 1.

Figure 1. Proud Boys members burn racial justice banners in the District

104. During the "Stop the Steal" rally, Oath Keepers leader and founder Stewart Rhodes gave a speech on behalf of Oath Keepers in which he called on President Trump to invoke the Insurrection Act to prevent President Biden from taking office.

105. He threatened that if President Trump failed to do so, "[w]e're going to have to do it ourselves later, in a much more desperate, much more bloody war."

III. Defendants Conspire to Deploy Violent Forces in the District in an Effort to Frustrate and Undermine the Formal Process Required to Declare a Presidential Election Winner.

106. Following the Stop the Steal Rally, Proud Boys and Oath Keepers members openly acknowledged an alliance between their two groups and began to plan and coordinate violence, hoping to maximize their impact through joint efforts on January 6th.

A. The Defendants Agreed to Form an Alliance and Coordinate Their Actions for the Planned January 6th Event.

107. On December 19, 2020, at 1:42 a.m., President Trump announced a January 6, 2021, rally in the District, tweeting: "Big protest in D.C. on January 6th. Be there, will be wild!"

108. The date of the rally was not a coincidence: January 6, 2021, was the date on which members of Congress and the Vice President, as President of the Senate, were required by certain provisions of the U.S. Constitution and Electoral Count Act of 1887 to count the certified electoral votes and formally declare the winner of the presidential election.

109. President Trump's supporters, including Defendants and Defendants' affiliates, took to social media, amplifying President Trump's message, interpreting the tweet as "marching orders" for Defendants' scheme to frustrate the final process in the presidential election:

- "Well, shit. We've got marching orders, bois [*sic*]."
- "That's a marching order if I ever heard one…"
- "THE COMMANDER IN CHIEF HAS ISSUED HIS ORDERS. JANUARY 6TH. WASHINGTON D.C."
- "No excuses . . . GEOTUS ["God Emperor of the United States"] ISSUED US OUR MARCHING ORDERS!"
- "If you've been waiting for a signal, THAT'S IT."

110. The Proud Boys and Oath Keepers immediately began working together to coordinate their efforts at the planned January 6th Attack. On December 19, 2020, Defendant K. Meggs of the Oath Keepers stated that he had formed an alliance with the Proud Boys and other groups to "work together" and "shut this shit down." *See* Figure 2.

Author Kelly Meggs (Facebook: 1517304829)
Sent 2020-12-19 15:22:53 UTC
Body Well we are ready for the rioters , this week I organized an alliance between Oath Keepers , Florida 3%ers , and Proud Boys . We have decided to work together and shut this shit down

Figure 2. Oath Keepers Defendant K. Meggs posts on social media about coordinating with the Proud Boys.

111. This was a coordinated plan for violent action.[5]

112. A few days later, on December 22, 2020, Defendant K. Meggs made clear that his discussions with the Proud Boys had continued and that they had reached an agreement on how to coordinate forces.

113. In a social media post outlining their plan, K. Meggs explained that there would be "at least 50-100" Oath Keepers in the District on January 6th and that they would join with the Proud Boys, who Meggs described as a "force multiplier." Meggs specifically noted that he had "made [c]ontact" with the Proud Boys, and that his group would join the "main group of [Proud Boys]" on January 6th. *See* Figure 3. Meggs further acknowledged that his group had a plan regarding how to position itself in relation to the "main group" of Proud Boys in order to maximize their impact.

[5] In describing this plan, Defendant K. Meggs also referred to "3%ers," i.e., persons subscribing to Three Percenter ideology. Three Percenters (also known as "3%ers," "III%ers," or "Threepers") constitute a major part of the broader militia movement and share a false belief that only three percent of the colonial population fought in the American Revolution. Three Percenters believe that, just as a small revolutionary vanguard overthrew the tyrannical British rule during the Revolution, a dedicated group of modern patriots could rid the United States of today's alleged tyranny. Today, some Three Percenters form militia groups, while others form non-paramilitary groups or create online networks, and even more are active as individual or unaffiliated Three Percenters.

Facebook Business Record Page 421

Body Nice , we will have at least 50-100 OK there

Author [redacted]
Sent 2020-12-22 22:47:51 UTC
Body Hell yeah!!!

Author Kelly Meggs (Facebook: 1517304829)
Sent 2020-12-22 22:49:48 UTC
Body Plus we have made
Contact with PB and they always have a big group . Force multiplier

Author [redacted]
Sent 2020-12-22 23:29:06 UTC
Body Yeah are they showing in force

Author Kelly Meggs (Facebook: 1517304829)
Sent 2020-12-22 23:41:56 UTC
Body I figure we could splinter off the main group of PB and come up behind them . Fucking crush them for good

Author [redacted]
Sent 2020-12-22 23:43:44 UTC
Body Good plan

Author Kelly Meggs (Facebook: 1517304829)
Sent 2020-12-22 23:50:59 UTC
Body We can hang for a while they'll see one group then we all fall to back of the pack and peel off . We catch them in the middle ..game over

Figure 3. Defendant K. Meggs discusses plans for violence, including that he is in contact with the Proud Boys.

114. On the same day, K. Meggs further stated that he would be going to the Capitol to "make it WILD" and encouraged other members to join him, saying "Gentlemen we are heading to DC pack your shit!!"

115. On December 25, 2020, Defendant K. Meggs posted another Facebook message discussing communications with Proud Boys leadership and how Oath Keepers had "orchestrated a plan with the [P]roud [B]oys." *See* Figure 4.

Facebook Business Record Page 1071

Body Where you want to go DC

Author Kelly Meggs (Facebook: 1517304829)
Sent 2020-12-25 00:40:32 UTC
Body Get a hotel and come with us

Author [redacted]
Sent 2020-12-25 00:40:39 UTC
Body I'm coming just need to know how to prepare

Author [redacted]
Sent 2020-12-25 00:40:58 UTC
Body I will need list of gear and attire

Author [redacted]
Sent 2020-12-25 00:41:30 UTC
Body Fuck these communist cock suckers

Author Kelly Meggs (Facebook: 1517304829)
Sent 2020-12-25 00:41:52 UTC
Body We are all staying in DC near the Capitol we are at the Hilton garden inn but I think it's full .

Dc is no guns . So mace and gas masks , some batons . If you have armor that's good . During the day it's kind of boring but when it starts getting dark Game on

Author Kelly Meggs (Facebook: 1517304829)
Sent 2020-12-25 00:43:05 UTC
Body No armor at least get a plate carrier on Amazon multi cam is best

Author Kelly Meggs (Facebook: 1517304829)
Sent 2020-12-25 00:45:18 UTC
Body You can hang with us we will probably be guarding [redacted] or someone during the day but then at night we have orchestrated a plan with the proud boys . I've been communicating with [redacted] the leader . We are gonna March with them for a while then fall back to the back of the crowd and turn off . Then we will have the proud boys get in front of them the cops will get between antifa and proud boys .
We will come in behind antifa and beat the hell out of them

Figure 4. Defendant K. Meggs discusses accommodations near the District for the attack on the Capitol, recommendations for tactical gear, and coordination with the Proud Boys.

116. In his message, Meggs further elaborated on the plan he had initially outlined in his December 22 posts, stating that he had agreed with Proud Boys leadership that the Oath Keepers group would march with the Proud Boys for some period of time, but would then separate from the Proud Boys. Then, when the police tried to intervene in conflicts between the Proud Boys and other protestors, Oath Keepers would be able to come up behind the other protestors and "beat the hell out of them" without police interference.

B. The Defendants Carefully Planned and Coordinated the January 6th Attack.

117. The Defendants used social media and electronic messaging platforms to coordinate the Attack, including by recruiting individuals to participate in the Attack, promoting strategic tactics for use during the Attack, coordinating collection and distribution of tactical gear

and weapons, and planning and organizing travel for themselves and their co-conspirators. These efforts began well before January 6th.[6]

1. The Defendants Recruited Participants for the Attack.

118. The Defendants' efforts to recruit co-conspirators—which began following the 2020 Presidential election—intensified as January 6th approached.

119. Between December 12, 2020 and January 3, 2021, Oath Keepers member Defendant K. Meggs organized approximately 10 online meetings on GoToMeeting, titled "se leaders dc 1/6/21 op call," "dc planning call," and "florida dc op planning chat." K. Meggs used the code name "Gator 1" in these meetings. Oath Keepers member Defendant Harrelson also participated in these meetings.

120. At the same time, Proud Boys Chairman, Defendant Tarrio, began identifying himself as a "war time" leader and changed his Parler display name to "Wartime Tarrio." By the end of the month, in posts on Parler and Telegram, Tarrio bragged that Proud Boys had already stopped using a particular hotel as a "hub" in light of the group's growing size: "With the new ability I've been able to put 1000 boots on the ground we outgrew any single hotel."

121. Defendant Nordean also used social media to recruit Proud Boys members and supporters. In early December, he posted, "You can take a hard stand now, or watch as everything we've all built crumble before your eyes and have nothing to leave your children. Enough is enough." By the end of the month, Nordean's message on social media was clear: "Fight now, or lose everything."

[6] For example, a video posted online by Proud Boys leader Defendant Biggs on January 3, 2021, described the Proud Boys' approach to planning its events as follows: "When we set out to do an event, we go alright, what is our main objective? And that's the first thing we discuss. We take three months to plan an event. And we go, what's our main objective? And then we plan around that, to achieve that main objective, that goal that we want."

2. Defendants Coordinated Strategies to Disguise Their Identities and Plans for the Attack.

122. Defendants' coordination was not limited to recruiting participants for the Attack; they also planned strategies to allow them to blend into the crowd and to communicate privately about the Attack. These efforts were intended to give Defendants a tactical advantage against law enforcement when they convened in the District on January 6, 2021.

123. In December 2020 and January 2021, the Proud Boys announced on social media that they would attend the January 6, 2021, rally "incognito." As Proud Boys leader Defendant Biggs explained in a social media post in December 2020, the Proud Boys would come to the District not "in colors" (i.e., the traditional black and yellow worn by Proud Boys members), but disguised to blend in with other demonstrators in the District.

124. Other members of the Proud Boys made similar posts promoting the same "incognito" tactic.

125. On December 29, 2020, Proud Boys Chairman Tarrio posted to Parler announcing that members of the Proud Boys would "turn out in record numbers on Jan 6th but this time with a twist . . . . We will not be wearing our traditional Black and Yellow. We will be incognito and we will be spread across downtown DC in smaller teams. And who knows . . . . we might dress in all BLACK for the occasion." Law enforcement investigating the January 6th Attack have attributed Tarrio's statement about dressing in black as a reference to dressing like "antifa," whom the Proud Boys have pegged as their enemy and who are often depicted in the media as dressing in all black when attending demonstrations.

126. In the same post, Tarrio instructed Proud Boys members to (i) "spread across downtown D.C. in smaller teams" than in the past, (ii) "conceal your intentions," (iii) "pose as a friend, work as a spy," (iv) "crush your enemy totally," and (v) "keep others in suspended terror."

127. The same day, Defendant Biggs, another Proud Boys leader, posted a similar message on Parler: "[W]e will not be attending DC in colors. We will be blending in as one of you. You won't see us. You'll even think we are you . . . . We are going to smell like you, move like you, and look like you. The only thing we'll do that's us is think like us! Jan 6th is gonna be epic."

128. Defendants also coordinated their strategic methods for secret communication before and during the Attack. For example, on or around January 3, 2021, Defendants Watkins, K. Meggs, Young, and Harrelson and other Oath Keepers joined an invitation-only encrypted Signal group message entitled "OK FL DC OP Jan 6." Similarly, Defendant James acknowledged communicating with a fellow Oath Keeper using a burner phone.[7]

129. Defendant Young later admitted in his plea agreement that he and others conspiring to thwart the certification of the presidential election "discussed the need to maintain operational security and accordingly used encrypted messaging applications to communicate with one another."

3. The Defendants Coordinated Collection of Weapons and Tactical Supplies for the Attack.

130. On December 25, 2020, Defendant K. Meggs shared a list of provisions on Facebook regarding how to prepare for the planned violence in the District on January 6th. K. Meggs wrote: "DC is no guns. So mace and gas masks, some batons. If you have armor that's good." In the same post, K. Meggs said: "You can hang with us [Oath Keepers] we will probably

[7] A burner phone is an inexpensive, prepaid mobile phone that can be discarded or destroyed when it is no longer needed. Burner phones can be used to avoid detection by authorities and are difficult to trace and track. They are commonly purchased with cash to avoid creating a paper trail that would tie the phone number to a specific person.

be guarding [redacted] or someone during the day but then at night we have orchestrated a plan with the proud boys. I've been communicating with [redacted] the leader[.]"

131. Defendant Rhodes told Defendants K. Meggs, Watkins, and other Oath Keepers to bring "collapsible batons," "good hard gloves," "eye protection," and helmets. Similarly, K. Meggs messaged at least one other participant to tell them to bring "mace," "gas masks," "batons," and "armor."

132. Other co-conspirators—including Defendants Watkins and Caldwell and their Oath Keepers cohorts—discussed transporting guns across state lines. And on January 1, 2021, Oath Keepers member Defendant James messaged an individual on Signal inquiring about bringing guns into the District. James wrote: "We[']re working on a Farm location[.] Some are bringing long rifles some sidearms. . . . I'm bringing sidearm."

133. The Oath Keepers also created the Quick Reaction Force as a way to bring additional weaponry and firearms to the Capitol in the event that violent clashes broke out or if they were called to act by President Trump. Before January 5, 2021, Oath Keepers member Jonathan Conrad Walden applied to be part of the January 6th Oath Keepers operation, emailing, "I am interested in the [Quick Reaction Force] team in D.C. I am a former Firefighter, EMT-B and have a K-9 trained for security patrol (82 lb. German Shepherd named 'Warrior'). I have a Jump Bag with Trauma supplies and have ALL the necessary [Second Amendment] gear that the situation may require. PLEASE ADVISE. As soon as I hear from you I can hit the road to join up!"

134. Additionally, in the days leading up to the January 6th Attack, Proud Boys members and affiliates also obtained tactical vests and military-style communications equipment which could be used during the siege on the Capitol. At the same time, self-described Proud Boys

"Sergeant-at-Arms" Defendant Nordean used social media to solicit donations of "protective gear" and "communications equipment" for use in the Attack.

4. The Defendants Coordinated Travel to the District.

135. Defendants and their co-conspirators also coordinated their plans to travel to and stay in or near the District for the Attack, including by using coordinated efforts to raise money online to cover transportation and accommodations costs.

136. Defendants' planning, promotion, and coordination efforts leading to the January 6th Attack also extended to travel logistics, as they sought to ensure that the co-conspirators traveled together or had nearby hotel accommodations to allow for additional in-person coordination before convening near the Capitol on January 6, 2021.

137. Defendants Caldwell, Watkins, S. Parker, B. Parker, K. Meggs, and C. Meggs coordinated their travel, convening at the Comfort Inn Ballston in Arlington, Virginia, each reserving and paying for hotel accommodations for multiple individuals traveling with them to join in the January 6th Attack. In a social media message, Defendant Caldwell confirmed that this is where he would be "Meeting up with Oathkeepers [*sic*] from North Carolina and Patriot group from the Shenandoah Valley."

138. On December 31, 2020, an individual contacted Defendant James via Signal stating "i have friends not far from DC with a lot of weapons and ammo if you get un trouble i ca. [*sic*] Coordinate help." James responded: "That might be helpful, but we have a shitload of [Quick Reaction Force] on standby with an arsenal."

139. Later that day, Defendant James messaged another individual and asked if they "have a farm location for weapons[.]" The individual responded, "Not that I am aware of yet. If nothing else, my hotel is in VA and has secured underground parking. About 15-20 minutes

outside DC, less if you really don't care about speed limits… would be great if we had someone with an enclosed truck type vehicle and had a quick response unit just outside the city." Defendant James responded, "I agree."

140. On January 1, 2021, Defendant Caldwell sent a message to Defendant Crowl recommending a room at the Comfort Inn Ballston for January 5-7, 2021, writing: "This is a good location and would allow us to hunt at night if we wanted to. I don't know if Stewie has even gotten out his call to arms but its [*sic*] a little friggin late. This is one we are doing on our own. We will link up with the north Carolina [*sic*] crew."

141. Oath Keepers member Defendant Crowl wrote to Defendant Caldwell: "Happy New year, to you Sir!! Guess I'll be seeing you soon. Will probably call you tomorrow…mainly because…I like to know wtf plan is. You are the man Commander." Around that time, Defendant Crowl was traveling to the Washington, D.C. area from Ohio, along with Defendants Watkins, S. Parker, and B. Parker. In another message, Defendant Crowl separately confirmed the reason for his trip: "been busy planning for this week. . . . We are enroute [*sic*] to DC right now for a few days on an Oathkeepers Op."

142. On January 2, 2021, Defendant Caldwell wrote to Defendant Crowl: "Check with Cap. I recommended the following hotel to her which STILL has rooms (unbelieveble) [*sic*]." Defendant Caldwell then sent a link to the Comfort Inn Ballston, the same hotel that he recommended to others.

143. As Defendant Caldwell explained further: "Sharon and I are setting up shop there. Paul has a room and is bringing someone. He will be the quick reaction force. Its [*sic*] going to be cold. We need a place to spend the night before minimum. . . . I will probably do pre-strike on the 5th though there are things going on that day. Maybe can do some night hunting. Oathkeeper

[*sic*] friends from North Carolina are taking commercial buses up early in the morning on the 6th and back same night. Paul will have the goodies in case things go bad and we need to get heavy."[8]

144. Defendant C. Meggs has since confessed that she attended a firearms class with Defendants K. Meggs and Harrelson in preparation for the January 6th Attack.

C. As January 6th Neared, the Defendants' Promotion of the Attack Became Increasingly Fervent.

145. Defendants' promotion of the January 6th Attack reached a fever pitch as the day approached.

146. Defendant Caldwell took to social media: "It begins for real Jan 5 and 6 on [*sic*] Washington D.C. when we mobilize in the streets. Let them try to certify some crud on Capitol Hill with a million or more patriots in the streets. This kettle is set to boil."

147. On January 1, 2021, Defendant Caldwell explained on social media that he would no longer make efforts to act peacefully: "I swore to support and defend the Constitution of the United States against all enemies foreign and domestic. I did the former, I have done the latter peacefully but they have morphed into pure evil even blatantly rigging an election and paying off the political caste. We must smite them now and drive them down."

148. On January 3, 2021, Proud Boys Chairman, Defendant Tarrio, shared a post to 7,000 followers on the app Telegram, asking: "[w]hat if we invade it?" The first reply answered: "January 6th is D day in America."

149. Proud Boys leader Defendant Biggs also posted to Parler: "Every law makers [*sic*] who breaks their own stupid Fucking laws should be dragged out of office and hung."

[8] Among others, Defendants Young and Steele traveled to the District together from North Carolina.

150. On January 3, 2021, Defendant K. Meggs stated that people should "tell [their] friends this isn't a Rally!" making explicit that he was preparing for something other than a mere protest.

151. On January 4, 2021, K. Meggs followed up his January 3 message by expressing his contempt for District police officers on Facebook, writing, "Fucking DC cops protect those antifa fuckers though pisses me off."

152. Also on January 4, 2021, Oath Keepers issued a public call on the group's official website for "patriots" to come to the District "to stand tall in support of President Trump" and "[p]repare to do whatever must be done to honor our oaths to defend the Constitution against all enemies, foreign and domestic . . . whatever happens."

153. By January 5, 2021, members of the Proud Boys and Oath Keepers made good on their plans and descended on the District.

154. That night, Defendant Biggs sent instructions to his co-conspirators using the secure "Boots on the Ground" channel—an encrypted messaging channel with more than 60 users used to disseminate orders and otherwise engage in acts of coordination—telling them to "avoid getting into any shit" the night before the planned attack, because "[t]omorrow's the day." Biggs continued, "Just trying to get our numbers. So we can plan accordingly for tonight and tomorrow's plan." Later, he reiterated: "We have a plan."

D. The Defendants Were Not Deterred by Law Enforcement Efforts to Control and Prevent Their Planned Violence.

155. In response to the Defendants' rhetoric and messaging around the January 6th "rally," including the many promises for violence, law enforcement officials made substantial efforts to disrupt and prevent the planned violence in advance.

156. For example, on January 4, 2021, as Defendant Tarrio arrived in the District for the January 6th Attack, MPD officers arrested him for his role in the burning of a church banner after the December 12, 2020, Stop the Steal Rally. While arresting Tarrio, MPD officers discovered two illegal high-capacity firearm magazines bearing the gold Proud Boys insignia. Defendant Tarrio's high-capacity magazines were compatible with AR-16 and M4 rifles. Defendant Tarrio was immediately ordered to stay away from the District pending his criminal trial.[9] This prevented him from being in the District on January 6th—and should have deterred those intent on committing violent acts at the January 6th "rally."

157. Law enforcement officials in surrounding areas also advised residents not to engage in or join the planned "rally." For example, the County Executive for Montgomery County, Maryland, which neighbors the District, released a statement on the morning of January 5, 2021, warning residents not to put themselves in harm's way by joining what "w[ould] not be ordinary protests," explaining: "Protest organizers and the groups they represent have shown an alarming affinity for violence. Sadly, they have not been shy about suggesting the need for violence. There is talk of disrupting the counting of votes in Congress, which would require extreme actions. This could create a volatile situation that may get out of hand, and we do not want people putting themselves in harm's way. . . . If there is an effort to disrupt the vote count, which would require an attempt to prevent the actual counting in Congress, there will be a confrontation."

158. Similarly, on January 5, 2021, the Federal Bureau of Investigation ("FBI") issued a warning that it had intelligence that extremists from several states would be traveling to the District to commit violence and "war" on January 6, 2021.

[9] In litigation concerning that order, the D.C. Court of Appeals observed that Defendant Tarrio's "conduct and statements in this case evince an inability to appreciate the difference between lawful protest and criminal activity under the laws of the District of Columbia; he has telegraphed his intentions to incite or participate in further criminal activity if permitted to return to the District. . . ."

159. The FBI's Norfolk, Virginia field office warned that these individuals had been sharing a map of the Capitol and its tunnels and were convening in the areas from several states.

160. Proud Boys leaders proceeded with their plans. Although advised by a Proud Boys member in an ongoing group chat on Telegram that participants "[s]houldn't be typing plans to commit felonies into your phone," those on the chat demonstrated the Proud Boys members' intent to coordinate their activities on January 6th. Proud Boys member Defendant Donohoe explained in the chat that "details will be laid out at the pre-meeting."

161. In another Parler message group, which included Proud Boys leaders and members including Defendants Nordean, Biggs, and Donohoe, the parties continued to convey their intent to cause violence in the District on January 6th, suggesting that they planned to "smash" police to dust and "burn [the] city to ash today." Defendant Donohoe responded, "I'm leaving with a crew of 15 at 0830 to hoof it to the monument no colors."

E. The Defendants Launched the January 6th Attack To Target Officials Charged with Certifying Electoral College Votes and Declaring a Presidential Election Winner.

162. The Defendants' conspiracy, which culminated in the January 6th Attack, targeted in part a process established by federal law to count the certified electoral votes and formally declare the winner of the Presidential election.

163. Once popular votes for President and Vice President have been cast, certain provisions of the U.S. Constitution together with the Electoral Count Act of 1887 create official duties both for members of Congress and the Vice President, as President of the Senate.

164. Specifically, after voting for the presidency has concluded, and after presidential Electors compile, sign, and certify lists of votes, the certified lists are transmitted to the seat of the government of the United States, directed to the President of the Senate. U.S. Const. amends. XII,

XXIII. At that point, "[t]he President of the Senate shall, in the presence of the Senate and House of Representatives, open all the certificates and the votes shall then be counted." *Id.* amend. XII.

165. The Electoral Count Act of 1887 provides that "Congress shall be in session on the sixth day of January succeeding every meeting of the electors." 3 U.S.C. § 15. The statute sets out a detailed process that requires a joint meeting of the "Senate and House of Representatives . . . in the Hall of the House of Representatives at the hour of 1 o'clock in the afternoon on that date" during which "the President of the Senate [opens] all the certificates and papers purporting to be certificates of the electoral votes . . . " of each State. *Id.*

166. After pre-appointed tellers from the Senate and House of Representatives read the certificates of electoral votes "in the presence and hearing of the two Houses," the law provides that the tellers "shall make a list of the votes as they shall appear from the said certificates." *Id.* § 15. Once the votes have been "ascertained and counted" pursuant to this process, "the result of the same shall be delivered to the President of the Senate, who shall thereupon announce the state of the vote, which announcement shall be deemed a sufficient declaration of the persons, if any, elected President and Vice President of the United States[.]" *Id.*

IV. Defendants Assemble Forces in the District for Their January 6th Attack.

167. On January 6, 2021, the Proud Boys, Oath Keepers, and their members and affiliates—including the Individual Defendants—attended President Trump's rally and prepared for violence.

168. Earlier that morning, the vast majority of the Individual Defendants and other currently unidentified John and Jane Doe Defendants, along with their Proud Boys and Oath Keepers co-conspirators, traveled together or otherwise convened in the District, congregating in groups and readying themselves for action.

169. At approximately 11:25 a.m., a YouTube video from Proud Boys member and live-streamer Eddie Block showed members of the Proud Boys lining up before the Attack, shouting out their home states. Proud Boys leader Defendant Biggs is shown organizing Proud Boys members and speaking into a walkie-talkie. Defendant Nordean is shown speaking to the group through a bullhorn. Defendant Scott is captured in Block's video footage shouting "let's take the fucking Capitol!" In response, another Proud Boys member chastised Defendant Scott for talking about their plan, saying "don't yell it, do it."

Figure 5. Image from video capturing Defendant Scott's direction to other Proud Boys on January 6th

170. At 12:17 p.m., President Trump directed his supporters to the Capitol. "We're going to walk down to the Capitol—and we're going to cheer on our brave senators and congressmen and women, and we're probably not going to be cheering so much for some of them," President Trump said.

171. At this point, the Defendants, who were stationed throughout the crowd, began to tell others that the time to break into the Capitol had come, yelling: "YEAH! LET'S TAKE THE CAPITOL!"

172. For his part, President Trump called the crowd to action, using his position to echo and amplify the message Defendants had already started to send out: "You'll never take back our country with weakness. You have to show strength, and you have to be strong."

173. Again, the crowd responded: "YES! STORM THE CAPITOL! INVADE THE CAPITOL BUILDING! Let's take the Capitol! Right now!!"

174. Twenty minutes before President Trump's speech concluded, members of Oath Keepers, including Defendant Watkins, left the "rally" and began marching toward the Capitol.

175. As President Trump's comments neared their conclusion, his rhetoric fanned the flames that Defendants had ignited, imploring the crowd to "fight like hell" or risk losing the country: "Something is wrong here, something is really wrong, can't have happened and we fight, we fight like hell, and if you don't fight like hell, you're not going to have a country anymore." The crowd chanted in response: "FIGHT LIKE HELL!"

176. At 1:11 p.m., President Trump concluded: "So let's walk down Pennsylvania Avenue." Proud Boys member and live-streamer Eddie Block filmed his co-conspirators' actions during President Trump's speech, including Proud Boys leader Defendant Biggs' efforts directing the march of approximately 60 Proud Boys on the Capitol. Biggs shouted orders to the group to "tighten up," "hold," and "turn."

177. As President Trump concluded his speech, other Individual Defendants, including dozens of members of the Proud Boys in military-style tactical gear, marched toward the Capitol building.

178. Oath Keepers member Defendant Watkins posted a message on an audio app, saying, "Trump's been trying to drain the swamp with a straw. We just brought a shop vac."

179. Meanwhile, Proud Boys members coordinated their movements using handheld radios and encrypted communication channels, including the "Boots on the Ground" channel, which was used by Proud Boys leaders Biggs and Nordean. In preparation for the January 6th Attack, the Proud Boys created the New Ministry of Self Defense ("New MOSD") channel to coordinate their members. The group included Defendants Nordean, Biggs, Donohoe, Rehl, and others. Donohoe posted in the channel to meet at the Washington Monument and that details would be explained at the "pre-meeting." Leaders and members of the Proud Boys, including Defendants Nordean and Biggs, also directed the mob with a bullhorn.

180. As they approached the Capitol, members of the Proud Boys encouraged and directed the group. Consistent with the plans articulated by Proud Boys Chairman Defendant Tarrio, members of the group were not wearing typical Proud Boys colors of black and yellow, but were instead dressed "incognito" in dark clothing, and several held walkie-talkie-style communication devices.

181. Although the Proud Boys were told not to wear Proud Boys indicators, photos and video footage show some of them, including Defendant Pezzola, wearing clothing with the Proud Boys slogan "Fuck Around and Find Out," or "FAFO."

182. Members and affiliates of Oath Keepers donned paramilitary equipment, helmets, reinforced vests, and clothing with Oath Keepers paraphernalia. Specifically, before arriving at the Capitol building, together with several other currently unidentified John and Jane Doe Defendants, Defendants Crowl, Watkins, Caldwell, S. Parker, B. Parker, Young, Steele, K. Meggs,

and C. Meggs equipped themselves with communication devices and donned reinforced vests, helmets, and goggles.

V. Defendants Attacked the Capitol Using Coordinated Violence.

A. Defendants Stormed the Capitol and Forced Their Way Inside.

183. None of the Defendants had authorization to enter the U.S. Capitol, which is secured 24 hours a day by U.S. Capitol Police, has permanent and temporary security barriers and posts manned by Capitol Police, and permits only authorized individuals to enter.

184. The District's MPD also provides security for the Capitol from time to time.

185. Nonetheless, by approximately 11:30 a.m., a large group had congregated outside the Capitol, including Proud Boys and Oath Keepers leadership and certain of their members and affiliates.

186. Outside the Capitol, members of the Proud Boys and Oath Keepers, including Defendant Biggs, provided tactical direction to fellow Defendants, including other currently unidentified Defendant John and Jane Does.

187. Defendants and their cohort began violently clashing with the MPD and Capitol Police officers who tried to prevent them from entering the building. During the clash, Defendants screamed at the police, repeating messages like those Defendants promoted before the mob convened, such as: "We were invited here! We were invited by the President of the United States!" and "Our president wants us here. We wait and take orders from our president." As Officer Aquilino Gonall, a Capitol Police officer, later testified before the House Select Committee to Investigate the January 6th Attack on the U.S. Capitol ("House Select Committee"): "[a]ll of them—all of them were telling us [the police officers] 'Trump sent us.'"

Figure 6. The crowd clashes with MPD and Capitol Police officers outside the Capitol.

188. By 12:53 p.m., the Defendants, including Proud Boys Individual Defendants Biggs, Chrestman, Colon, Kuehne, Bru, and other currently unidentified John and Jane Doe Defendants, overwhelmed the police and breached the outermost barricade that had been erected to protect the Capitol.

189. At 1:00 p.m., a joint session of the U.S. Congress (the "Joint Session") convened at the Capitol for members of Congress and Vice President Pence to carry out their Constitutional and statutory duties of receiving and counting the Electoral College votes.

190. At approximately the same time, Capitol Police and MPD officers in riot gear arrived to reinforce the line of officers on the Capitol steps.

191. Undeterred, Defendants and others in the crowd climbed the barriers, while an unidentified John Doe Defendant with a bullhorn instructed the crowd to push forward. Members of the Proud Boys led the charge at the front of the mob trying to breach the Capitol. Other members of the crowd even scaled the walls of the Capitol Complex. *See* Figure 7.

Figure 7. Members of the crowd scale the walls of the Capitol Complex.

192. Members of the Proud Boys and Oath Keepers forced their way past the barricades, assaulted officers, and rushed toward the Capitol building.

193. Proud Boys member Defendant Bru grabbed a police barricade in an attempt to wrench it from law enforcement protecting the Capitol. *See* Figure 8.

Figure 8. Defendant Bru and others attempt to wrestle control of the barricades away from police as they march on the Capitol.

194. After pushing their way past another barricade, Proud Boys member Defendant Klein obtained and used the police barricade to help others climb the Capitol walls and gain access to an external stairwell. Proud Boys member Defendant Worrell, equipped with a tactical vest and communications equipment, sprayed a noxious substance (seemingly pepper spray gel) toward a line of police officers guarding an entryway to the Capitol on the west side.

195. By approximately 1:30 p.m., the House and Senate adjourned to separate chambers to resolve an objection to the vote count, with Vice President Pence presiding over the Senate chamber. As the proceedings continued in both the House and the Senate, the crowd outside the Capitol continued to grow in size and became more restless.

196. By approximately 1:37 p.m., Defendant Scott and others made it to the lower western part of the plaza, just outside the Capitol. A line of law enforcement officers stood on the steps leading to the Capitol building. As is clear from videos of this scene posted to the social media site Parler, Defendant Scott pushed two Capitol Police officers backwards, up the steps to the Capitol. This violent act instigated a broader violent confrontation with the police. Defendant Scott grabbed and pulled a police officer toward the mob, until another officer ultimately intervened.

Figure 9. Defendant Scott (man in green jacket and blue hat) pushing an officer

Figure 10. Defendant Scott confronting an officer, while a second officer attempts to intervene

197. Shortly past 2:00 p.m., Defendant Caldwell sent Defendant Watkins a text message stating: "Where are you? Pence has punked out. We are screwed. . . . I am here at the dry fountain to the left of the Capitol."

Figure 11. Storming the Capitol Complex

198. At approximately 2:15 p.m., the mob, led by several individual Defendants, breached the Capitol by breaking windows and climbing inside the building, opening doors for co-conspirators to follow. *See* Figure 12.

Figure 12. Defendant Pezzola uses a stolen Capitol Police riot shield to break a window of the Capitol.

199. Defendants Biggs and Nordean were among the first to enter, along with a large group of other Proud Boys-affiliated Individual Defendants and unidentified John and Jane Doe Defendants.

200. As seen in Figure 12, Proud Boys members Biggs and Pezzola entered the Capitol building by breaking a window using a police shield stolen from a Capitol Police officer.

201. At approximately 2:16 p.m., Defendants James, Minuta, and other members of Oath Keepers heard that individuals had breached the Capitol. Defendant Minuta stated: "Now we're talking, that's what I came here for!" Defendant James instructed the group to gather their gear and head towards the Capitol. Minuta had on tactical gear, including hard-knuckles, ballistic goggles, a tactical vest, a radio with an earpiece, and bear spray.

202. Oath Keepers member Walden and Defendants Minuta and James, along with other associates, then drove golf carts towards the Capitol, swerving around law enforcement as they rushed to join the assault. As they drove, Defendant Minuta declared: "Patriots are storming the Capitol building; there's violence against patriots by the D.C. Police; so we're en route in a grand

theft auto golf cart to the Capitol building right now . . . it's going down, guys; it's literally going down right now Patriots storming the Capitol building . . . fucking war in the streets right now . . . word is they got in the building . . . let's go."

203. Oath Keepers leader Rhodes, who coordinated logistical details for many involved in the Attack in real time, messaged another Oath Keepers leader, informing him that members of the team had "taken ground at the capital [*sic*]," instructing that "[w]e need to regroup any members who are not on mission." Rhodes instructed his group to report to the "South Side of the Capitol," suggesting that they had strategically planned to simultaneously (or near-simultaneously) enter the Capitol from a different entrance than the Proud Boys in order to weaken the building's defense by forcing law enforcement to defend multiple doors.

204. Around the time that direction was given, Oath Keepers Defendants Crowl, Watkins, S. Parker, Young, Steele, K. Meggs, and C. Meggs joined together with other currently unidentified John and Jane Doe Defendants to form a "military stack" ("the Stack") formation of individuals wearing Oath Keepers clothing, patches, insignia, and battle gear. At least one of the Oath Keepers members wore a patch that warned: "I don't believe in anything. I'm just here for violence."

205. At 2:22 p.m., Defendants Crowl, Watkins, S. Parker, B. Parker, Steele, K. Meggs, C. Meggs, Oath Keepers member Hackett, and others, entered the Capitol grounds. Upon entering the grounds, they gathered in a circle.

206. At 2:24 p.m., Defendant K. Meggs received the message from Oath Keepers founder Rhodes to come to the south side of the Capitol. At 2:25 p.m., Rhodes forwarded a message to the Signal group chat with the same instructions and posted a photograph showing the southeast side of the Capitol.

207. At around 2:32 p.m., Rhodes exchanged a 97-second telephone call with Defendant K. Meggs, who was in the Oath Keepers Stack.

208. At 2:35 p.m., the Stack maneuvered together in an organized and coordinated fashion up the steps of the Capitol, with each person keeping a hand on the shoulder of the person in front of them, as depicted in Figure 13.

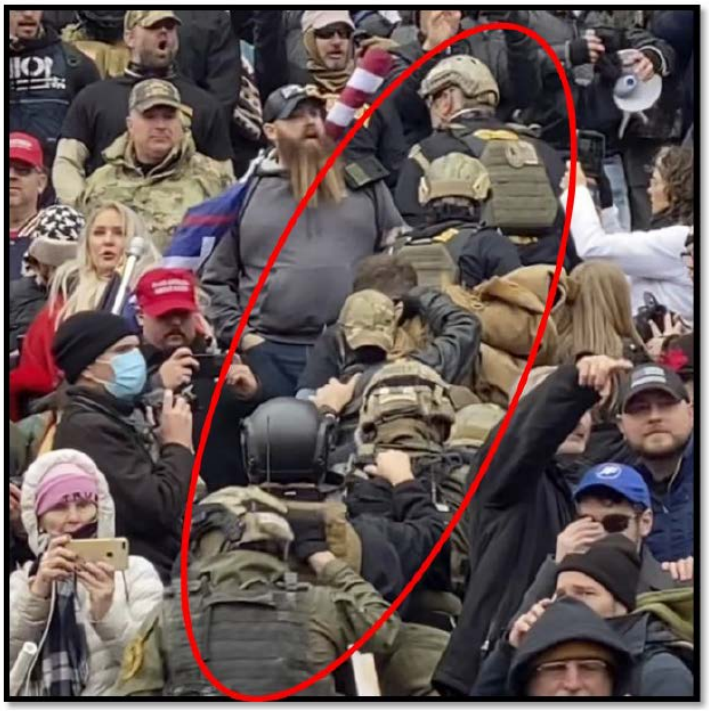

Figure 13. Oath Keepers advance on the Capitol in stack formation.

209. Towards the top of the steps, Oath Keepers member Dolan and Defendant Harrelson joined the Stack.

210. At approximately 2:40 p.m., Oath Keepers members Hackett and Dolan and Defendants Crowl, Harrelson, Watkins, S. Parker, Young, Steele, K. Meggs, and C. Meggs, together with other currently unidentified John and Jane Doe Defendants in their group, forcibly entered the Capitol through the Rotunda door in the center of the east side of the building. The group assaulted police officers guarding the door in order to breach the building, including by

throwing objects at the officers and deploying chemical irritants against them. This group of Defendants—each suited up in protective combat gear—continued to maintain their Stack formation as they entered, as depicted in Figures 13 and 14.

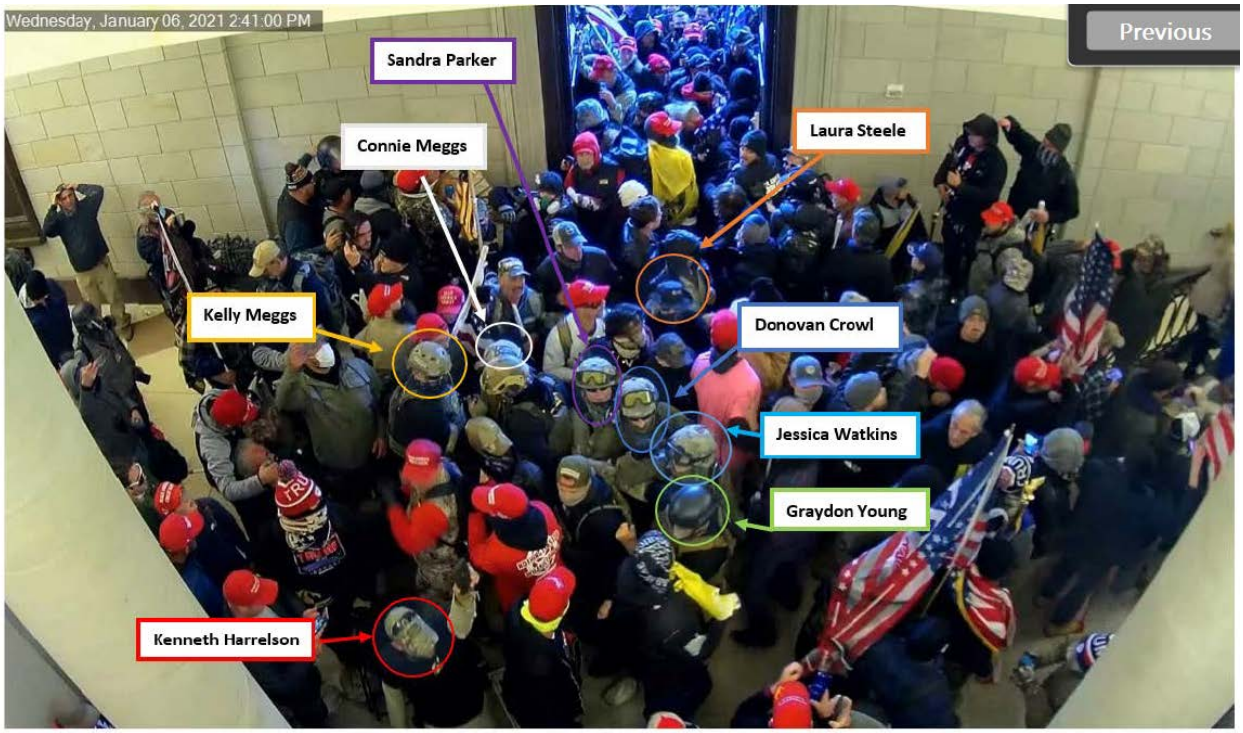

Figure 14. Oath Keepers in protective combat gear breach the Capitol Building.

211. As Defendant Watkins later confirmed when challenged about whether she had actually forced her way into the Capitol: "Forced. Like Rugby. We entered through the back door of the Capitol." Another of Defendant Watkins's posts confirmed: "Yeah. We stormed the Capitol today. Teargassed, the whole, [*sic*] 9. Pushed our way into the Rotunda. Made it into the Senate even. The news is lying (even Fox) about the Historical Events we created today."

212. Defendant Young later admitted in his plea agreement that "[a]t the time he forcibly entered the building, [Young] believed that he and [certain Oath Keepers] co-conspirators were trying to obstruct, influence, and impede an official proceeding, that is, a proceeding before Congress, specifically, Congress's certification of the Electoral College vote."

213. Around the same time, Proud Boys member Garcia uploaded a video to his Facebook account filmed from the inside of the Capitol building. He narrated his actions for his social media followers, stating: "We just went ahead and stormed the Capitol. It's about to get ugly." Later in the video, Proud Boys member Garcia can be observed directing those around him to overtake law enforcement in the Capitol. As officers attempted to stop him from advancing, he yelled, "USA! Storm this shit!" *See* Figure 15.

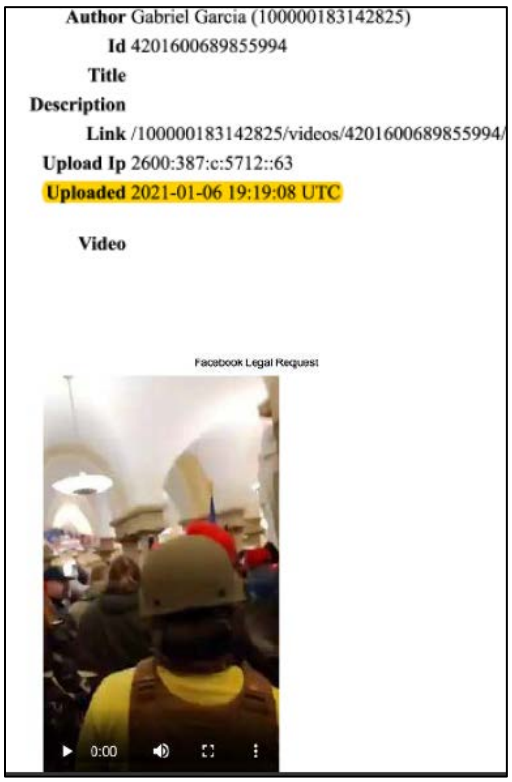

Figure 15. Garcia uploads a video on Facebook showing him directing the crowd to storm the Capitol.

214. Nearly simultaneously, Oath Keepers member Isaacs joined a mob advancing on the Columbus Doors at the central east entrance to the Capitol. The mob, including Isaacs, then assaulted the officers who were guarding the Columbus Doors, throwing objects and spraying chemical irritants at the officers as they violently pulled on the doors. At approximately 2:39 p.m., Isaacs and the mob breached the Columbus Doors and entered the Capitol.

215. On January 7, 2021, Defendant Crowl confirmed that the Defendants had agreed to simultaneously attack the Capitol building through separate doors, stating: "Yes. . . we went in through the east 'back' door. Just as they broke through the front door. I'll have to tell you about it. . . . It. . . was. . . EPIC!!!"

216. By 2:48 p.m., Defendant Caldwell sent a social media message stating: "We are surging forward. Doors breached."

217. Proud Boys, Oath Keepers, and their members and affiliates—including the Individual Defendants—continued to force their way into the building. At 3:15 p.m., Defendants James, Minuta, and others forcibly entered the Capitol through the east side of the Rotunda—the same path that members of the Stack had used to enter the Capitol earlier that day. Defendant Minuta was armed with bear spray and other tactical gear. Walden brought his 82-pound security dog into the building.

218. Proud Boys member Eddie Block livestreamed the actions of those around him as they assaulted the Capitol building, telling viewers that "flash bombs [were] going off. Rubber pellets were flying everywhere. Tear gas was everywhere." Block positioned himself on the second-level balcony of the Capitol grounds where he would continue livestreaming until the police dispersed the crowd later that night.

B. Once Inside the Capitol, the Defendants Continued to Use Violence as They Moved Toward the Congressional Chambers.

219. Once inside, Defendants continued their violent rampage, actively seeking out the official election certification proceedings and individuals with official functions in an effort to disrupt the election certification process with threats and violence.

Figure 16. Defendants and their cohort marching through the halls of the Capitol

220. Defendants Bru, Pepe, and Jackman were captured on video and in photographs walking in the crowd among other Defendant John and Jane Does and others within the Capitol building after overtaking law enforcement outside of the building. *See* Figure 17.

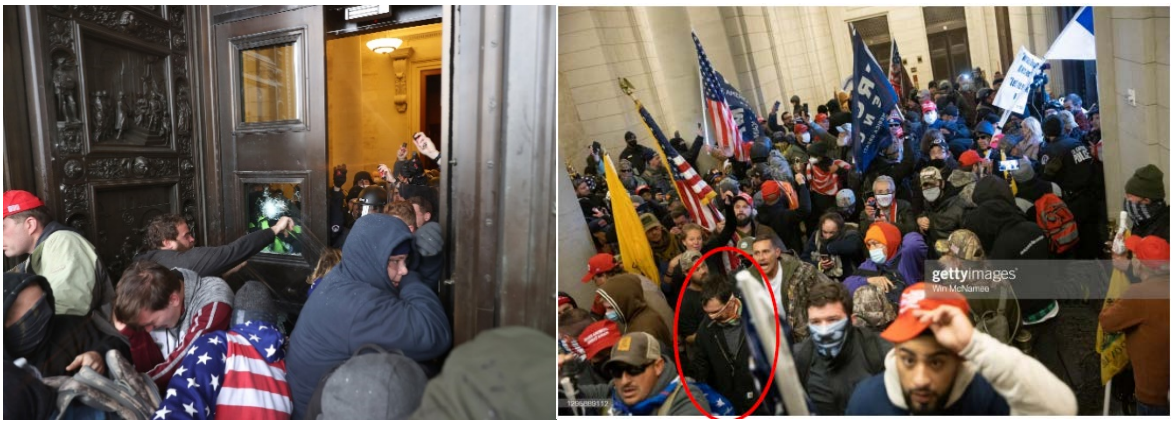

Figure 17. Defendants, including Bru, and their cohort, breach the Capitol and storm its halls.

221. Proud Boys member Defendant Chrestman was also in the crowd, carrying a wooden axe handle. Chrestman threatened a Capitol Police officer, telling him, "You shoot and I'll take your fucking ass out!" *See* Figure 18.

Figure 18. Defendant Chrestman carrying a wooden axe handle through the Capitol

222. Oath Keepers members Hackett and Dolan, and Defendants Crowl, Watkins, S. Parker, Young, Steele, K. Meggs, and C. Meggs, as well as other unidentified John and Jane Doe Defendants in the group, also joined the larger crowd, pushing past law enforcement who attempted to stop them.

223. Similarly, Oath Keepers Defendants Minuta and James joined other attackers in pushing a line of law enforcement officers who had formed a barrier between the Rotunda and the Capitol lobby. During this altercation, Defendant James yanked and pushed several police officers while repeatedly yelling, "Get out of my Capitol!" and "This is my fucking building! This is not yours! This is my Capitol!" Defendant Minuta recorded these events on camera while yelling, "This is what's bound to happen, just get out! Get out! Get these cops out! It's our fucking building! Get 'em out, get out!"

Figure 19. Defendant Schaffer shouting as he marches through the Capitol

224. Defendant DeCarlo, who wore a t-shirt reading "Murder the Media," etched those same words into the Memorial Door on the East Front of the Capitol. The door was intended to honor two Capitol Police officers who died in the line of duty in 1998. At the same door, Defendant DeCarlo stole a pair of flexible handcuffs from a Capitol Police officer's bag.

C. Defendants Breached Congressional Chambers in Pursuit of Their Goal of Disrupting Certification of the Election Results.

225. When the mob first broke into the Capitol, members of the House of Representatives and the Senate were tallying the votes cast by members of the Electoral College in the 2020 Presidential Election.

226. Vice President Pence was also at the Capitol in his capacity as the President of the Senate, to preside over the tally of the Electoral College ballots. Having declined to suspend the Electoral College vote tally, Vice President Pence became a target of the mob's violent threats. They chanted, "Hang Mike Pence!"

227. As the events unfolded, the risk to the Vice President and members of Congress increased.

228. Police and security personnel barricaded the doors to the House chamber, where lawmakers and others were forced to take cover on the ground as the Defendants and others beat on the doors and attempted to force their way through the barricades. *See* Figure 20.

Figure 20. Capitol security barricades the House Chamber with weapons drawn.

Figure 21. Rep. Jason Crow of Colorado, center, comforts Rep. Susan Wild of Pennsylvania while taking cover as the Defendants and others storm the Capitol.

229. At approximately 2:30 p.m., Defendants' unlawful attack on the Capitol had become so disruptive and such a threat to safety and security that congressional staff, members of Congress, and Vice President Pence were evacuated. The Joint Session was halted while law enforcement officers worked to restore order and clear the Capitol of the unlawful occupants, including Defendants.

Figure 22. Evacuation of Members of Congress

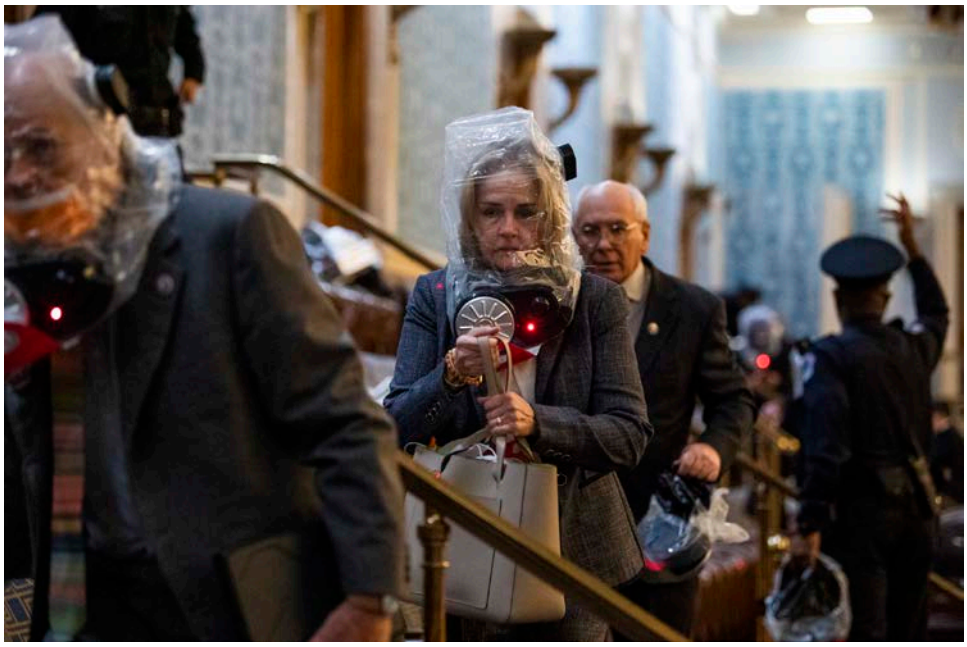

Figure 23. Evacuees wear gas masks as they flee the Capitol.

Figure 24. Vice President Pence in the process of being evacuated from the Capitol

230. Many individuals, including Defendants, breached the House and Senate chambers, continuing to flaunt their activities on social media. For example, Defendant Jackman broke into the Capitol with Defendants Biggs and Rehl, entered the gallery of the Senate chamber, and was videotaped walking up a flight of stairs in the Capitol with his hand on Proud Boys leader Defendant Biggs' shoulder. Jackman entered the Senate chamber and proceeded to take a picture of himself.

Figure 25. Posing for pictures after storming the Senate chambers

231. Several members of the Defendants' cohort, including some of those who entered the Congressional chambers, carried plastic zip handcuffs for the purpose of capturing and detaining persons, including members of Congress. *See* Figure 26.

Figure 26. Standing on the Senate floor, holding several plastic zip handcuffs

232. For hours that day, Defendants and thousands of others entered and occupied the grounds of the Capitol building using violence.

Figure 27. The Capitol on the afternoon of January 6th

233. The Joint Session could not reconvene until approximately 8:00 p.m. At approximately 3:40 a.m. on January 7th, Vice President Pence affirmed the election results, formally declaring now President Biden the President-elect.

234. Following the Attack, the Defendants celebrated the havoc they had wrought on the Capitol, in some cases even proudly admitting to the conspiracy between the Proud Boys, the Oath Keepers, their leadership, and certain of their members and affiliates to carry out the January 6th Attack.

D. Defendants Attacked Law Enforcement Officers Throughout Their Attack on the Capitol.

235. Several Defendants attacked police officers who attempted to defend the Capitol and members of Congress. *See* Figures 28 and 29.

Figure 28. The crowd attacked police as they began to breach the Capitol building.

Figure 29. The crowd clashed with police inside the Capitol building.

236. Members of the crowd sprayed law enforcement officers with bear mace, a pepper spray designed to deter bear attacks that is more concentrated than self-defense products meant to deter human attacks. When sprayed into the face, it causes temporary loss of sight, nasal congestion, and, in some, difficulty breathing.

237. Others dragged and kicked law enforcement officers, pushed them down stairs, trampled them, punched them, and ran over them in a stampede.

238. One MPD officer was beaten by members of the crowd with sticks and crutches, including by one person wielding an American flag. *See* Figure 30. The MPD officer later recalled during his testimony before the House Select Committee that attackers were lunging at him and trying to grab his gun while chanting "kill him with his own gun."

Figure 30. The crowd of Defendants and others dragging and beating an MPD Officer on the Capitol steps

239. Defendant Pezzola participated in at least one group attack on another police officer. Defendant Pezzola ripped away a Capitol Police officer's riot shield while the officer was physically engaged with others.

240. Shortly after breaching the Capitol in stack formation, Defendants Crowl, Watkins, S. Parker, Young, and Steele, along with Oath Keepers member Isaacs, moved from the Rotunda through the northbound hallway and attempted to enter the Senate's wing of Congress.

241. In advancing towards the Senate, Oath Keepers member Isaacs waved the crowd down the hallways to the Senate and yelled "the fight's not over."

242. At 2:45 p.m. and afterward, Defendants Crowl, Watkins, S. Parker, and Young, along with Oath Keepers member Isaacs, joined a mob pushing against a line of riot police officers guarding the hallway connecting the Rotunda to the Senate. Defendant Watkins commanded those around her to "push, push, push," and to "get in there, get in there," while insisting, "they [the police officers] can't hold us."

243. Additional unidentified John and Jane Doe Defendants were involved in similar attacks.

244. Proud Boys member Defendant Nordean later posted a photo on Parler showing a U.S. Capitol Police officer, under siege, using pepper spray during the January 6th Attack, opining that "if you feel bad for the police, you are part of the problem."

E. Defendants Coordinated Communications During the Attack.

245. The Individual Defendants and some or all of the currently unidentified John and Jane Doe Defendants kept in communication throughout the January 6th Attack, including through the use of two-way walkie-talkie-style radios, cellular telephones, and social media to coordinate their actions.

246. Many of the Individual Defendants used a Signal chat to discuss the ongoing attack. At 2:41 p.m. that day, a co-conspirator wrote to the group chat, attaching a picture of the southeast side of the Capitol and adding, "South side of US Capitol. Patriots pounding on doors." Around the same time, Defendants K. Meggs, Crowl, Watkins, S. Parker, Young, Steele, and C. Meggs were breaching the doors to the Capitol.

247. Oath Keepers member Defendant Watkins also communicated with other members of Oath Keepers during the Capitol breach over a Zello channel called "Stop the Steal J6":

- Watkins: "We have a good group. We have about 30-40 of us. We are sticking together and *sticking to the plan*." (emphasis added).
- Unknown male: "We'll see you soon, Jess. Airborne."
- Unknown male: "You are executing citizen's arrest. Arrest this assembly, we have probable cause for acts of treason, election fraud."
- Watkins: "We are in the mezzanine. We are in the main dome right now. We are rocking it. They are throwing grenades, they are fricking shooting people with paint balls. But we are in here."
- Unknown male responds, telling Watkins to be safe, and states: "Get it, Jess. Do your fucking thing. This is what we fucking [unintelligible] up for. *Everything we fucking trained for*." (emphasis added).

248. Defendants also exchanged information about the location of members of Congress, who by that point had begun to hide from the mob that was hunting them.

249. When Defendant Caldwell posted a Facebook message that read, "Inside," he received the following messages, among others:

- "Tom take that bitch over";
- "Tom all legislators are down in the Tunnels 3 floors down";
- "Do like we had to do when I was in the core start tearing out floors go from top to bottom"; and
- "Go through back house chamber doors facing N left down hallway down steps."

250. One co-conspirator communicated to Defendant Caldwell: "All members are in the tunnels under capital [*sic*] seal them in. Turn on gas."

251. Another affiliate, Keith Lee, reported on a podcast during the Attack that "backup" was arriving at the Capitol, including members of the Proud Boys.

252. In an indictment, prosecutors revealed that Rhodes, his deputy, and three additional members of Oath Keepers who acted as guards for the political consultant Roger Stone on January 6th exchanged 19 phone calls during the January 6th Attacks totaling over three hours.

VI. The District of Columbia Answered the Call to Provide Support during the January 6th Attack—and Was Injured as a Result.

253. In response to concerns leading up to January 6th, MPD deployed its officers on 12-hour shifts around the District. No officers were permitted to take leave on that day.

254. Other law enforcement partners such as the Metropolitan Transit Police and non-law enforcement agencies such as the District's Homeland Security and Emergency Management Agency and the Fire and Emergency Medical Services Department were also supporting these efforts.

255. The measures taken by MPD and others to prepare for January 6th were unprecedented: never before had the certification of an election required such significant allocation of law enforcement resources.

256. Nonetheless, these resources were insufficient to counter the unprecedented violent assault on the U.S. Capitol by Defendants in an attempt to halt the counting of the electoral ballots, an essential step in the peaceful transfer of the presidency.

257. As the events described above began to unfold, the Capitol Police quickly discovered that they could not defend the Capitol alone. Accordingly, at 12:58 p.m. on January 6th, the Chief of the Capitol Police asked for MPD's assistance at the Capitol.

258. MPD responded immediately, deploying several Civil Disturbance Unit Platoons.

259. By the time MPD officers arrived at the Capitol, the area was in chaos.

260. MPD officers were engaged in a battle for hours. Many were forced into hand-to-hand combat to prevent even more of the Defendants and their cohort from gaining entry into the Capitol.

261. By 2:30 p.m., MPD resources were so overwhelmed that the District had to request additional police officers from as far away as New Jersey.

A. MPD Officers Suffered Physical and Mental Injuries as a Result of the Defendants' Attack

262. At least 65 MPD officers reported sustaining injuries as a direct result of the January 6th Attack.

263. The officers' physical injuries varied, ranging from bruised arms and legs, swollen ankles and wrists, and lacerations, to more serious damage such as irritated eyes and lungs from bear and pepper spray, cracked ribs, shattered spinal discs, wounds from being hit with a metal fence stake, and concussions from head blows from various objects, including metal poles ripped from inauguration-related scaffolding and an American flag pole.

264. One MPD officer reported being hit on the back of his head with a pole, and that the attackers had wrenched his head back. The officer sustained a concussion, which necessitated visits to neurologists and therapists.

265. One MPD officer testified before the House Select Committee regarding the physical and mental injuries he sustained as a result of the Attack. He described suffering a heart attack (caused by being repeatedly hit with a stun gun), a concussion, a traumatic brain injury, and post-traumatic stress disorder.

266. The MPD officer was electrocuted multiple times as he was beaten unconscious by the crowd while screaming for help. While the crowd was beating him with fists and hard metal objects, they shouted "kill him with his own gun" and stripped his badge, radio, and ammunition

from his body. As a result of his injuries, the MPD officer lost consciousness for more than four minutes.

267. The MPD officer was finally driven to MedStar Washington Hospital by his MPD partner, who was also heavily injured. The officer continues to suffer psychological trauma and anxiety from the attack.

268. A second MPD officer also testified before Congress. During the Attack, that officer was crushed between a doorframe and a clear plastic shield that was wielded by someone in the crowd. As he has described publicly, attackers threw items at his head, attempted to wrest away his baton, and teargassed him. At one point, someone tried to gouge out his eye. Eventually, while he was pinned against the door, another attacker beat his head against the wall. Another man wrested away the officer's baton and beat him in the face with it, leaving him with a ruptured lip and cranial injuries.

Figure 31. The second MPD officer as he is crushed between a doorframe and a police shield

269. The group also pulled another MPD officer into the mob where they kicked him, beat him with poles, and stomped on him. The MPD officer eventually escaped from the mob, bleeding from his head, and was treated for a laceration that required two staples.

270. Other MPD officers sustained injuries that are not yet formally reported, including scratches, bruises, and eyes burning from bear mace.

271. The effects of the January 6th Attack have continued. MPD officers continue to suffer the effects of complex physical and emotional trauma.

272. Dr. Beverly Anderson, a therapist who serves as the clinical director of the Metropolitan Police Employee Assistance Program, has worked with nearly 1,000 officers since the January 6th Attack in an effort to help them cope with the physical and emotional trauma caused by the Defendants and their cohort. During the course of her work, Dr. Anderson discovered that some officers suffered head traumas as a result of the Attack that had previously gone undiagnosed.

273. The Attack's impact on MPD and its officers has been long-lasting and severe.

274. As of mid-July, more than six months after the Attack, some of the officers who responded to the Attack were still on leave as a result of the trauma they suffered at the Defendants' hands.

B. The District Has Incurred Significant Damages as a Result of Defendants' Unlawful Actions

275. For the District, the fiscal costs of this Attack—which are directly attributable to the Defendants' calculated, pre-planned, and coordinated actions—have been steep.

276. The Defendants' actions necessitated an unprecedented deployment of MPD resources. During the height of the Attack, approximately 850 MPD officers were at the Capitol; by the day's end, approximately 250 additional MPD officers were in the area to support the response and aftermath. These numbers far exceed the number of officers necessary for the MPD's usual duties, including usual duties carried out during non-violent rallies and protests, and the costs to the District arising from this expansive deployment of MPD resources was significant.

277. The District also incurred costs related to the emergency and other medical care provided to MPD officers who were injured as a result of the Defendants' actions. Dozens of MPD

officers formally reported and were treated for injuries resulting from the Defendants' Attack. Many MPD officers also required—and in some cases, still require—mental health care following the traumatic events that unfolded during the Attack. The District expects to pay for continued medical care for these officers as necessary going forward, including care related to the impact of the Attack on MPD officers' mental health.

278. While the costs to the District are still being investigated and tallied, the District has preliminarily estimated that MPD incurred millions of dollars in costs during the week of January 6th alone.

COUNT I: 42 U.S.C. § 1985(1)
(ALL DEFENDANTS)

279. Plaintiff reincorporates by reference the allegations contained in all preceding paragraphs.

280. Plaintiff states Count One, under 42 U.S.C. § 1985(1), against all Defendants.

281. Defendants agreed and entered into a conspiracy amongst themselves and with other co-conspirators, in the United States, to storm the Capitol building violently and unlawfully on January 6, 2021 (the "Section 1985 Conspiracy").

282. The object of the Section 1985 Conspiracy was to prevent, interrupt, hinder, and impede, through force, intimidation, and threat: (i) United States officials from discharging official duties of their offices and positions of trust as part of the formal process for counting and certifying the count of electoral votes for the 2020 presidential election and declaring a winner of the 2020 presidential election; (ii) President Biden and Vice President Kamala Harris from accepting or holding the offices of President of the United States and Vice President of the United States, respectively; and (iii) President Biden and Vice President Harris from discharging any

duties of the offices of President of the United States and Vice President of the United States, respectively.

283. Defendants also conspired to injure Vice President Pence's person and property on account of his lawful discharge or performance of his duties as Vice President of the United States and President of the Senate with respect to the election.

284. In furtherance of the conspiracy, Defendants and their co-conspirators:

a. engaged in preparations and took steps to advance the goals of their conspiracy against United States officials in advance of and on January 6, 2021, and

b. violently overran federal and District police forces as Defendants forced their way into the Capitol building, where Defendants used force, intimidation, and threats to prevent Congress from following the constitutional process set out by the Twelfth Amendment and 3 U.S.C. § 15 for counting and certifying electoral votes for, and declaring a winner of, the 2020 presidential election.

285. Through these actions, Defendants and their co-conspirators perpetrated malicious and unlawful acts in furtherance of their conspiracy, including, but not limited to:

a. unlawfully obstructing federal officials in the performance of their constitutional duties;

b. unlawfully trespassing on federal property;

c. physically threatening or attempting to cause physical injury to federal, state, and municipal police officers, including MPD officers employed by Plaintiff who were acting in the line of duty to protect the Capitol; and

d. engaging in harmful bodily contact against federal, state, and municipal police officers, including MPD officers employed by Plaintiff, injuring many.

286. As a direct result of Defendants' and their co-conspirators' unlawful conspiracy and the actions taken in support of that conspiracy, the District suffered extraordinary damages and costs, including but not limited to:

a. costs to dispatch hundreds of MPD officers to defend the Capitol and its surroundings against the Defendants' attack, including transportation, coordination, and overtime expenses;

b. costs for emergency and other medical treatment for injured MPD officers; and

c. costs for paid leave for MPD officers who could not work as a result of their injuries.

287. Based on the foregoing, Defendants are jointly and severally liable to Plaintiff under 42 U.S.C. § 1985(1) for the harms suffered by the District.

COUNT II: 42 U.S.C. § 1986
(ALL DEFENDANTS)

288. Plaintiff reincorporates by reference the allegations contained in all preceding paragraphs.

289. This Count is brought by Plaintiff against all Defendants.

290. Defendants had actual knowledge of the conspiracy among the Defendants and their unnamed co-conspirators described in Count I, *supra*.

291. As alleged in Count I, the District suffered damages as a result of Defendants' Section 1985 Conspiracy.

292. Defendants were well aware that the wrongs pled in Count I were about to and would be committed, as Defendants were present and participated actively in the conspiracy and the actions taken in furtherance of the conspiracy that resulted in the injuries suffered by the District. Thus, each of the Defendants had the power to prevent or aid in preventing the commission of the same.

293. Despite this awareness, Defendants neglected or refused to prevent the conspiracy. To the contrary, Defendants spread misinformation, fanned the flames of the conspiracy, actively encouraged and participated in the actions that left the Capitol in shambles, threatened a vital component of our democracy, and injured law enforcement.

294. Based on the foregoing, Defendants are liable to Plaintiff under 42 U.S.C. § 1986 for the harms they caused to the District.

COUNT III: ASSAULT
(CIVIL CONSPIRACY BY ALL DEFENDANTS)

295. Plaintiff reincorporates by reference the allegations contained in all preceding paragraphs.

296. This Count is brought by Plaintiff against all Defendants.

297. As set forth above, Defendants agreed to participate together in a common scheme to commit unlawful acts, or to commit lawful acts by unlawful means, including, but not limited to, unlawfully obstructing federal officials in the performance of their constitutional duties, unlawfully inciting and carrying out a riot, unlawfully trespassing on federal property, and committing numerous acts of intimidation, threats of violence, and violence.

298. Pursuant to and in furtherance of that common scheme, the Defendants' intentional acts caused individuals in and around the Capitol, including MPD officers, to suffer immediate apprehension of harmful or offensive bodily contact.

299. Based on the foregoing, all Defendants are liable to the District as civil co-conspirators for the resulting damage.

COUNT IV: BATTERY
(CIVIL CONSPIRACY BY ALL DEFENDANTS)

300. Plaintiff reincorporates by reference the allegations contained in all preceding paragraphs.

301. This Count is brought by Plaintiff against all Defendants.

302. As set forth above, Defendants agreed to participate together in a common scheme to commit unlawful acts, or to commit lawful acts by unlawful means, including, but not limited to, unlawfully obstructing federal officials in the performance of their constitutional duties, unlawfully inciting and carrying out a riot, unlawfully trespassing on federal property, and committing numerous acts of intimidation, threats of violence, and violence.

303. Pursuant to, and in furtherance of that common scheme, the Defendants' intentional actions caused harmful and offensive bodily contact with individuals in and around the Capitol, including MPD officers.

304. Based on the foregoing, all Defendants are liable to the District as civil co-conspirators for the resulting damage.

COUNT V: INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(CIVIL CONSPIRACY BY ALL DEFENDANTS)

305. Plaintiff reincorporates by reference the allegations contained in all preceding paragraphs.

306. This Count is brought by Plaintiff against all Defendants.

307. As set forth above, Defendants agreed to participate together in a common scheme to commit unlawful acts, or to commit lawful acts by unlawful means, including, but not limited to, unlawfully obstructing federal officials in the performance of their constitutional duties,

unlawfully inciting and carrying out a riot, unlawfully trespassing on federal property, and committing numerous acts of intimidation, threats of violence, and violence.

308. Pursuant to, and in furtherance of that common scheme, Defendants exhibited extreme and outrageous conduct that went beyond all possible bounds of decency. This conduct intentionally or recklessly caused MPD officers to suffer from severe emotional distress, as described *supra*.

309. Based on the foregoing, all Defendants are liable to the District as civil co-conspirators for the resulting damage.

PRAYER FOR RELIEF

Wherefore, Plaintiff respectfully requests an award of the following relief:

A. A declaratory judgment that the actions described herein constitute a violation of 42 U.S.C. § 1985(1); 42 U.S.C. § 1986; and the torts of assault, battery, and intentional infliction of emotional distress.

B. Injunctive relief enjoining Defendants from engaging in future violations of 42 U.S.C. § 1985(1); 42 U.S.C. § 1986; and the torts of assault, battery, and intentional infliction of emotional distress.

C. Compensatory and statutory damages in an amount to be determined at trial as to damages incurred by the District resulting from the events alleged above.

D. Punitive damages at an amount to be determined at trial.

E. Attorneys' fees and court costs under 42 U.S.C. § 1988.

F. Such other relief as the Court deems just and proper.

JURY DEMAND

The District demands a trial by jury for all claims so triable.

Dated: December 14, 2021

Counsel for Plaintiff District of Columbia:

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* *Pro hac vice application forthcoming*

CIVIL COVER SHEET

JS-44 (Rev. 11/2020 DC)

I. (a) PLAINTIFFS

District of Columbia

(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF 11001
(EXCEPT IN U.S. PLAINTIFF CASES)

DEFENDANTS

See Attachment A

COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT 88888
(IN U.S. PLAINTIFF CASES ONLY)
NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED

(c) ATTORNEYS (FIRM NAME, ADDRESS, AND TELEPHONE NUMBER)

See Attachment B

ATTORNEYS (IF KNOWN)

II. BASIS OF JURISDICTION
(PLACE AN x IN ONE BOX ONLY)

- ○ 1 U.S. Government Plaintiff
- ◉ 3 Federal Question (U.S. Government Not a Party)
- ○ 2 U.S. Government Defendant
- ○ 4 Diversity (Indicate Citizenship of Parties in item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (PLACE AN x IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT) **FOR DIVERSITY CASES ONLY!**

	PTF	DFT		PTF	DFT
Citizen of this State	○ 1	○ 1	Incorporated or Principal Place of Business in This State	○ 4	○ 4
Citizen of Another State	○ 2	○ 2	Incorporated and Principal Place of Business in Another State	○ 5	○ 5
Citizen or Subject of a Foreign Country	○ 3	○ 3	Foreign Nation	○ 6	○ 6

IV. CASE ASSIGNMENT AND NATURE OF SUIT

(Place an X in one category, A-N, that best represents your Cause of Action and one in a corresponding Nature of Suit)

○ **A. *Antitrust***

- ☐ 410 Antitrust

○ **B. *Personal Injury/ Malpractice***

- ☐ 310 Airplane
- ☐ 315 Airplane Product Liability
- ☐ 320 Assault, Libel & Slander
- ☐ 330 Federal Employers Liability
- ☐ 340 Marine
- ☐ 345 Marine Product Liability
- ☐ 350 Motor Vehicle
- ☐ 355 Motor Vehicle Product Liability
- ☐ 360 Other Personal Injury
- ☐ 362 Medical Malpractice
- ☐ 365 Product Liability
- ☐ 367 Health Care/Pharmaceutical Personal Injury Product Liability
- ☐ 368 Asbestos Product Liability

○ **C. *Administrative Agency Review***

- ☐ 151 Medicare Act

Social Security

- ☐ 861 HIA (1395ff)
- ☐ 862 Black Lung (923)
- ☐ 863 DIWC/DIWW (405(g))
- ☐ 864 SSID Title XVI
- ☐ 865 RSI (405(g))

Other Statutes

- ☐ 891 Agricultural Acts
- ☐ 893 Environmental Matters
- ☐ 890 Other Statutory Actions (If Administrative Agency is Involved)

○ **D. *Temporary Restraining Order/Preliminary Injunction***

Any nature of suit from any category may be selected for this category of case assignment.

(If Antitrust, then A governs)

○ **E. *General Civil (Other)*** OR ○ **F. *Pro Se General Civil***

Real Property

- ☐ 210 Land Condemnation
- ☐ 220 Foreclosure
- ☐ 230 Rent, Lease & Ejectment
- ☐ 240 Torts to Land
- ☐ 245 Tort Product Liability
- ☐ 290 All Other Real Property

Personal Property

- ☐ 370 Other Fraud
- ☐ 371 Truth in Lending
- ☐ 380 Other Personal Property Damage
- ☐ 385 Property Damage Product Liability

Bankruptcy

- ☐ 422 Appeal 27 USC 158
- ☐ 423 Withdrawal 28 USC 157

Prisoner Petitions

- ☐ 535 Death Penalty
- ☐ 540 Mandamus & Other
- ☐ 550 Civil Rights
- ☐ 555 Prison Conditions
- ☐ 560 Civil Detainee – Conditions of Confinement

Property Rights

- ☐ 820 Copyrights
- ☐ 830 Patent
- ☐ 835 Patent – Abbreviated New Drug Application
- ☐ 840 Trademark
- ☐ 880 Defend Trade Secrets Act of 2016 (DTSA)

Federal Tax Suits

- ☐ 870 Taxes (US plaintiff or defendant)
- ☐ 871 IRS-Third Party 26 USC 7609

Forfeiture/Penalty

- ☐ 625 Drug Related Seizure of Property 21 USC 881
- ☐ 690 Other

Other Statutes

- ☐ 375 False Claims Act
- ☐ 376 Qui Tam (31 USC 3729(a))
- ☐ 400 State Reapportionment
- ☐ 430 Banks & Banking
- ☐ 450 Commerce/ICC Rates/etc
- ☐ 460 Deportation
- ☐ 462 Naturalization Application
- ☐ 465 Other Immigration Actions
- ☐ 470 Racketeer Influenced & Corrupt Organization
- ☐ 480 Consumer Credit
- ☐ 485 Telephone Consumer Protection Act (TCPA)
- ☐ 490 Cable/Satellite TV
- ☐ 850 Securities/Commodities/ Exchange
- ☐ 896 Arbitration
- ☐ 899 Administrative Procedure Act/Review or Appeal of Agency Decision
- ☐ 950 Constitutionality of State Statutes
- ☐ 890 Other Statutory Actions (if not administrative agency review or Privacy Act)

G. *Habeas Corpus/ 2255*	H. *Employment Discrimination*	I. *FOIA/Privacy Act*	J. *Student Loan*
☐ 530 Habeas Corpus – General ☐ 510 Motion/Vacate Sentence ☐ 463 Habeas Corpus – Alien Detainee	☐ 442 Civil Rights – Employment (criteria: race, gender/sex, national origin, discrimination, disability, age, religion, retaliation) *(If pro se, select this deck)*	☐ 895 Freedom of Information Act ☐ 890 Other Statutory Actions (if Privacy Act) *(If pro se, select this deck)*	☐ 152 Recovery of Defaulted Student Loan (excluding veterans)
K. *Labor/ERISA (non-employment)*	**L. *Other Civil Rights (non-employment)***	**M. *Contract***	**N. *Three-Judge Court***
☐ 710 Fair Labor Standards Act ☐ 720 Labor/Mgmt. Relations ☐ 740 Labor Railway Act ☐ 751 Family and Medical Leave Act ☐ 790 Other Labor Litigation ☐ 791 Empl. Ret. Inc. Security Act	☐ 441 Voting (if not Voting Rights Act) ☐ 443 Housing/Accommodations ☒ 440 Other Civil Rights ☐ 445 Americans w/Disabilities – Employment ☐ 446 Americans w/Disabilities – Other ☐ 448 Education	☐ 110 Insurance ☐ 120 Marine ☐ 130 Miller Act ☐ 140 Negotiable Instrument ☐ 150 Recovery of Overpayment & Enforcement of Judgment ☐ 153 Recovery of Overpayment of Veteran's Benefits ☐ 160 Stockholder's Suits ☐ 190 Other Contracts ☐ 195 Contract Product Liability ☐ 196 Franchise	☐ 441 Civil Rights – Voting (if Voting Rights Act)

V. ORIGIN

◉ 1 Original Proceeding	○ 2 Removed from State Court	○ 3 Remanded from Appellate Court	○ 4 Reinstated or Reopened	○ 5 Transferred from another district (specify)	○ 6 Multi-district Litigation	○ 7 Appeal to District Judge from Mag. Judge	○ 8 Multi-district Litigation – Direct File

VI. CAUSE OF ACTION (CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE A BRIEF STATEMENT OF CAUSE.)
42 U.S.C. §§ 1985(1) and 1986; Civil Conspiracy; and related tort law claims.

VII. REQUESTED IN COMPLAINT ☐ CHECK IF THIS IS A **CLASS ACTION** UNDER F.R.C.P. 23 **DEMAND $** **JURY DEMAND:** Check YES only if demanded in complaint **YES** ☒ **NO** ☐

VIII. RELATED CASE(S) IF ANY (See instruction) **YES** ☒ **NO** ☐ If yes, please complete related case form

DATE: December 14, 2021 **SIGNATURE OF ATTORNEY OF RECORD** /s/ Jeannie Rhee

INSTRUCTIONS FOR COMPLETING CIVIL COVER SHEET JS-44
Authority for Civil Cover Sheet

The JS-44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and services of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. Listed below are tips for completing the civil cover sheet. These tips coincide with the Roman Numerals on the cover sheet.

I. COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF/DEFENDANT (b) County of residence: Use 11001 to indicate plaintiff if resident of Washington, DC, 88888 if plaintiff is resident of United States but not Washington, DC, and 99999 if plaintiff is outside the United States.

III. CITIZENSHIP OF PRINCIPAL PARTIES: This section is completed only if diversity of citizenship was selected as the Basis of Jurisdiction under Section II.

IV. CASE ASSIGNMENT AND NATURE OF SUIT: The assignment of a judge to your case will depend on the category you select that best represents the primary cause of action found in your complaint. You may select only one category. You must also select one corresponding nature of suit found under the category of the case.

VI. CAUSE OF ACTION: Cite the U.S. Civil Statute under which you are filing and write a brief statement of the primary cause.

VIII. RELATED CASE(S), IF ANY: If you indicated that there is a related case, you must complete a related case form, which may be obtained from the Clerk's Office.

Because of the need for accurate and complete information, you should ensure the accuracy of the information provided prior to signing the form.

ATTACHMENT A

Defendants

Proud Boys International, L.L.C.

Oath Keepers

Ryan Ashlock

Joseph Randall Biggs

Marc Anthony Bru

Thomas Edward Caldwell

William Chrestman

Louis Enrique Colon

Donovan Ray Crowl

Nicholas DeCarlo

Charles Donohoe

Kenneth Harrelson

Arthur Jackman

Joshua James

Jonathanpeter Klein

Christopher Kuehne

Connie Meggs

Kelly Meggs

Roberto A. Minuta

Ethan Nordean

Nicholas Robert Ochs

Bennie Alvin Parker

Sandra Ruth Parker

William Joseph Pepe

Dominic Pezzola

Zachary Rehl

Jon Ryan Schaffer

Daniel Lyons Scott

Laura Steele

Henry "Enrique" Tarrio

Jessica Marie Watkins

Christopher John Worrell

Graydon Young

John and Jane Does 1−50.

ATTACHMENT B

Counsel for Plaintiff District of Columbia

KARL A. RACINE, ATTORNEY GENERAL FOR THE DISTRICT OF COLUMBIA

Kathleen Konopka (D.C. Bar 495257)
Vikram Swaruup (D.C. Bar 1670692)
400 6th St. NW
Washington, DC 20001
Tel: 202-724-6533
Email: vikram.swaruup@dc.gov

STATES UNITED DEMOCRACY CENTER

Norman Eisen (D.C. Bar 435051)
1420 K Street NW
Washington, DC 20005
Tel: 202-656-8178
Email: norm@statesuniteddemocracy.org

Christine P. Sun
3749 Buchanan St., No. 475165
San Francisco, CA 94147-3103
Tel: 615-574-9108
Email:christine@statesuniteddemocracy.org

Aaron Scherzer
572 Valley Road, No. 43592
Montclair, NJ 07043
Tel: 862-367-6480
Email: aaron@statesuniteddemocracy.org

THE ANTI-DEFAMATION LEAGUE

Eileen B. Hershenov
605 Third Avenue
New York, NY 10158-3650
Tel: 212-885-5805
Email: ehershenov@adl.org

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP

Jeannie S. Rhee (D.C. Bar 464127)
2001 K Street, NW
Washington, D.C. 20006-1047
Tel: 202-223-7300
Fax: 202-223-7420
Email: jrhee@paulweiss.com

Daniel J. Kramer
Andrew J. Ehrlich
Erin J. Morgan
1285 Avenue of the Americas
New York, NY 10019-6064
Tel: 212-373-3000
Fax: 212-757-3990
Email: dkramer@paulweiss.com; aehrlich@paulweiss.com; ejmorgan@paulweiss.com

DECHERT LLP

Matthew L. Larrabee
1095 Avenue of the Americas
New York, NY 10036-6797
Tel: 212-698-3500
Fax: 212-698-3599
Email: matthew.larrabee@dechert.com

Vincent H. Cohen, Jr. (D.C. Bar 471489)
D. Brett Kohlhofer (D.C. Bar 1022963)
1900 K Street, NW
Washington, D.C. 20006-1110
Tel: 202-261-3300
Fax: 202-261-3333
Email: vincent.cohen@dechert.com; d.brett.kohlhofer@dechert.com

Michael S. Doluisio
2929 Arch Street
Philadelphia, PA 19104-2808
Tel: 215-994-2000
Fax: 215-994-2222
Email: michael.doluisio@dechert.com

AO 440 (Rev. 06/12; DC 3/15) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Columbia

District of Columbia *Plaintiff(s)* v. See Attachment A *Defendant(s)*	)	Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Proud Boys International, L.L.C.
c/o Henry "Enrique" Tarrio
Chairman
DCDC No. 376128
1901 D Street, SE
Washington, DC 20003

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Jeannie S. Rhee
Paul, Weiss, Rifkind, Wharton & Garrison LLP
2001 K Street, NW
Washington, DC 20006-1047

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ANGELA D. CAESAR, CLERK OF COURT

Date: _____

_____
Signature of Clerk or Deputy Clerk

Civil Action No.

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____ was received by me on *(date)* _____ .

❒ I personally served the summons on the individual at *(place)* _____ on *(date)* _____ ; or

❒ I left the summons at the individual's residence or usual place of abode with *(name)* _____ , a person of suitable age and discretion who resides there, on *(date)* _____ , and mailed a copy to the individual's last known address; or

❒ I served the summons on *(name of individual)* _____ , who is designated by law to accept service of process on behalf of *(name of organization)* _____ on *(date)* _____ ; or

❒ I returned the summons unexecuted because _____ ; or

❒ Other *(specify):*

My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc:

Print

ATTACHMENT A

Defendants

Proud Boys International, L.L.C.

Oath Keepers

Ryan Ashlock

Joseph Randall Biggs

Marc Anthony Bru

Thomas Edward Caldwell

William Chrestman

Louis Enrique Colon

Donovan Ray Crowl

Nicholas DeCarlo

Charles Donohoe

Kenneth Harrelson

Arthur Jackman

Joshua James

Jonathanpeter Klein

Christopher Kuehne

Connie Meggs

Kelly Meggs

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Ethan Nordean

Nicholas Robert Ochs

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Jessica Marie Watkins

Christopher John Worrell

Graydon Young

John and Jane Does 1−50.

AO 440 (Rev. 06/12; DC 3/15) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Columbia

District of Columbia *Plaintiff(s)* v. See Attachment A *Defendant(s)*	))))))))))))	Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Oath Keepers,
5130 Fort Apache Rd,
Las Vegas, NV 89148

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Jeannie S. Rhee
Paul, Weiss, Rifkind, Wharton & Garrison LLP
2001 K Street, NW
Washington, DC 20006-1047

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ANGELA D. CAESAR, CLERK OF COURT

Date: _____

_____
Signature of Clerk or Deputy Clerk

Civil Action No.

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____ was received by me on *(date)* _____ .

❒ I personally served the summons on the individual at *(place)* _____ on *(date)* _____ ; or

❒ I left the summons at the individual's residence or usual place of abode with *(name)* _____ , a person of suitable age and discretion who resides there, on *(date)* _____ , and mailed a copy to the individual's last known address; or

❒ I served the summons on *(name of individual)* _____ , who is designated by law to accept service of process on behalf of *(name of organization)* _____ on *(date)* _____ ; or

❒ I returned the summons unexecuted because _____ ; or

❒ Other *(specify):*

My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc:

Print

ATTACHMENT A

Defendants

Proud Boys International, L.L.C.

Oath Keepers

Ryan Ashlock

Joseph Randall Biggs

Marc Anthony Bru

Thomas Edward Caldwell

William Chrestman

Louis Enrique Colon

Donovan Ray Crowl

Nicholas DeCarlo

Charles Donohoe

Kenneth Harrelson

Arthur Jackman

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Christopher John Worrell

Graydon Young

John and Jane Does 1−50.

AO 440 (Rev. 06/12; DC 3/15) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Columbia

District of Columbia *Plaintiff(s)* v. See Attachment A *Defendant(s)*	))))))))))))	Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Ryan Ashlock,
711 S. Spruce Cir.,
Gardner, KS 66030-1632

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Jeannie S. Rhee
Paul, Weiss, Rifkind, Wharton & Garrison LLP
2001 K Street, NW
Washington, DC 20006-1047

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ANGELA D. CAESAR, CLERK OF COURT

Date: _____

_____
Signature of Clerk or Deputy Clerk

Civil Action No.

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____ was received by me on *(date)* _____ .

❒ I personally served the summons on the individual at *(place)* _____ on *(date)* _____ ; or

❒ I left the summons at the individual's residence or usual place of abode with *(name)* _____ , a person of suitable age and discretion who resides there, on *(date)* _____ , and mailed a copy to the individual's last known address; or

❒ I served the summons on *(name of individual)* _____ , who is designated by law to accept service of process on behalf of *(name of organization)* _____ on *(date)* _____ ; or

❒ I returned the summons unexecuted because _____ ; or

❒ Other *(specify):*

My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc:

Print

ATTACHMENT A

Defendants

Proud Boys International, L.L.C.

Oath Keepers

Ryan Ashlock

Joseph Randall Biggs

Marc Anthony Bru

Thomas Edward Caldwell

William Chrestman

Louis Enrique Colon

Donovan Ray Crowl

Nicholas DeCarlo

Charles Donohoe

Kenneth Harrelson

Arthur Jackman

Joshua James

Jonathanpeter Klein

Christopher Kuehne

Connie Meggs

Kelly Meggs

Roberto A. Minuta

Ethan Nordean

Nicholas Robert Ochs

Bennie Alvin Parker

Sandra Ruth Parker

William Joseph Pepe

Dominic Pezzola

Zachary Rehl

Jon Ryan Schaffer

Daniel Lyons Scott

Laura Steele

Henry “Enrique” Tarrio

Jessica Marie Watkins

Christopher John Worrell

Graydon Young

John and Jane Does 1−50.

AO 440 (Rev. 06/12; DC 3/15) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Columbia

District of Columbia *Plaintiff(s)* v. See Attachment A *Defendant(s)*	))))))))))))	Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Joseph Randall Biggs
Inmate No. 202100002744
c/o Seminole County Jail (G)
211 Eslinger Way
Sanford, Florida 32773

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Jeannie S. Rhee
Paul, Weiss, Rifkind, Wharton & Garrison LLP
2001 K Street, NW
Washington, DC 20006-1047

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ANGELA D. CAESAR, CLERK OF COURT

Date: _____

_____
Signature of Clerk or Deputy Clerk

Civil Action No.

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____ was received by me on *(date)* _____ .

❒ I personally served the summons on the individual at *(place)* _____ on *(date)* _____ ; or

❒ I left the summons at the individual's residence or usual place of abode with *(name)* _____ , a person of suitable age and discretion who resides there, on *(date)* _____ , and mailed a copy to the individual's last known address; or

❒ I served the summons on *(name of individual)* _____ , who is designated by law to accept service of process on behalf of *(name of organization)* _____ on *(date)* _____ ; or

❒ I returned the summons unexecuted because _____ ; or

❒ Other *(specify):*

My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc:

Print

ATTACHMENT A

Defendants

Proud Boys International, L.L.C.

Oath Keepers

Ryan Ashlock

Joseph Randall Biggs

Marc Anthony Bru

Thomas Edward Caldwell

William Chrestman

Louis Enrique Colon

Donovan Ray Crowl

Nicholas DeCarlo

Charles Donohoe

Kenneth Harrelson

Arthur Jackman

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Christopher Kuehne

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Kelly Meggs

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Nicholas Robert Ochs

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Jon Ryan Schaffer

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Jessica Marie Watkins

Christopher John Worrell

Graydon Young

John and Jane Does 1−50.

AO 440 (Rev. 06/12; DC 3/15) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Columbia

District of Columbia *Plaintiff(s)* v. See Attachment A *Defendant(s)*	))))))))))))	Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Marc Anthony Bru,
10013 NE Hazel Dell Ave. #2,
Vancouver, WA 98685-5203

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Jeannie S. Rhee
Paul, Weiss, Rifkind, Wharton & Garrison LLP
2001 K Street, NW
Washington, DC 20006-1047

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ANGELA D. CAESAR, CLERK OF COURT

Date: _____

_____
Signature of Clerk or Deputy Clerk

Civil Action No.

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____ was received by me on *(date)* _____ .

❒ I personally served the summons on the individual at *(place)* _____ on *(date)* _____ ; or

❒ I left the summons at the individual's residence or usual place of abode with *(name)* _____ , a person of suitable age and discretion who resides there, on *(date)* _____ , and mailed a copy to the individual's last known address; or

❒ I served the summons on *(name of individual)* _____ , who is designated by law to accept service of process on behalf of *(name of organization)* _____ on *(date)* _____ ; or

❒ I returned the summons unexecuted because _____ ; or

❒ Other *(specify):*

My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc:

Print

ATTACHMENT A

Defendants

Proud Boys International, L.L.C.

Oath Keepers

Ryan Ashlock

Joseph Randall Biggs

Marc Anthony Bru

Thomas Edward Caldwell

William Chrestman

Louis Enrique Colon

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Nicholas DeCarlo

Charles Donohoe

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Jessica Marie Watkins

Christopher John Worrell

Graydon Young

John and Jane Does 1−50.

AO 440 (Rev. 06/12; DC 3/15) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Columbia

District of Columbia *Plaintiff(s)* v. See Attachment A *Defendant(s)*	))))))))))))	Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Thomas Edward Caldwell,
274 Wadesville Rd.,
Berryville, VA 22611-1821

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Jeannie S. Rhee
Paul, Weiss, Rifkind, Wharton & Garrison LLP
2001 K Street, NW
Washington, DC 20006-1047

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ANGELA D. CAESAR, CLERK OF COURT

Date: _____

_____
Signature of Clerk or Deputy Clerk

Civil Action No.

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____ was received by me on *(date)* _____ .

❒ I personally served the summons on the individual at *(place)* _____ on *(date)* _____ ; or

❒ I left the summons at the individual's residence or usual place of abode with *(name)* _____ , a person of suitable age and discretion who resides there, on *(date)* _____ , and mailed a copy to the individual's last known address; or

❒ I served the summons on *(name of individual)* _____ , who is designated by law to accept service of process on behalf of *(name of organization)* _____ on *(date)* _____ ; or

❒ I returned the summons unexecuted because _____ ; or

❒ Other *(specify):*

My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc:

Print

ATTACHMENT A

Defendants

Proud Boys International, L.L.C.

Oath Keepers

Ryan Ashlock

Joseph Randall Biggs

Marc Anthony Bru

Thomas Edward Caldwell

William Chrestman

Louis Enrique Colon

Donovan Ray Crowl

Nicholas DeCarlo

Charles Donohoe

Kenneth Harrelson

Arthur Jackman

Joshua James

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Christopher Kuehne

Connie Meggs

Kelly Meggs

Roberto A. Minuta

Ethan Nordean

Nicholas Robert Ochs

Bennie Alvin Parker

Sandra Ruth Parker

William Joseph Pepe

Dominic Pezzola

Zachary Rehl

Jon Ryan Schaffer

Daniel Lyons Scott

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Jessica Marie Watkins

Christopher John Worrell

Graydon Young

John and Jane Does 1−50.

AO 440 (Rev. 06/12; DC 3/15) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Columbia

District of Columbia *Plaintiff(s)* v. See Attachment A *Defendant(s)*	))))))))))))	Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* William Chrestman
c/o Correctional Treatment Facility (CTF)
DCDC No. 376975
1901 E St SE
Washington, D.C. 20003

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Jeannie S. Rhee
Paul, Weiss, Rifkind, Wharton & Garrison LLP
2001 K Street, NW
Washington, DC 20006-1047

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ANGELA D. CAESAR, CLERK OF COURT

Date: _____

_____
Signature of Clerk or Deputy Clerk

Civil Action No.

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____ was received by me on *(date)* _____ .

❒ I personally served the summons on the individual at *(place)* _____ on *(date)* _____ ; or

❒ I left the summons at the individual's residence or usual place of abode with *(name)* _____ , a person of suitable age and discretion who resides there, on *(date)* _____ , and mailed a copy to the individual's last known address; or

❒ I served the summons on *(name of individual)* _____ , who is designated by law to accept service of process on behalf of *(name of organization)* _____ on *(date)* _____ ; or

❒ I returned the summons unexecuted because _____ ; or

❒ Other *(specify):*

My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc:

Print

ATTACHMENT A

Defendants

Proud Boys International, L.L.C.

Oath Keepers

Ryan Ashlock

Joseph Randall Biggs

Marc Anthony Bru

Thomas Edward Caldwell

William Chrestman

Louis Enrique Colon

Donovan Ray Crowl

Nicholas DeCarlo

Charles Donohoe

Kenneth Harrelson

Arthur Jackman

Joshua James

Jonathanpeter Klein

Christopher Kuehne

Connie Meggs

Kelly Meggs

Roberto A. Minuta

Ethan Nordean

Nicholas Robert Ochs

Bennie Alvin Parker

Sandra Ruth Parker

William Joseph Pepe

Dominic Pezzola

Zachary Rehl

Jon Ryan Schaffer

Daniel Lyons Scott

Laura Steele

Henry “Enrique” Tarrio

Jessica Marie Watkins

Christopher John Worrell

Graydon Young

John and Jane Does 1−50.

AO 440 (Rev. 06/12; DC 3/15) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Columbia

District of Columbia *Plaintiff(s)* v. See Attachment A *Defendant(s)*	))))))))))))	Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Louis Enrique Colon,
131 SW 27th St.,
Blue Springs, MO 64015-3342

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Jeannie S. Rhee
Paul, Weiss, Rifkind, Wharton & Garrison LLP
2001 K Street, NW
Washington, DC 20006-1047

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ANGELA D. CAESAR, CLERK OF COURT

Date: _____

_____
Signature of Clerk or Deputy Clerk

Civil Action No.

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____ was received by me on *(date)* _____ .

❒ I personally served the summons on the individual at *(place)* _____ on *(date)* _____ ; or

❒ I left the summons at the individual's residence or usual place of abode with *(name)* _____ , a person of suitable age and discretion who resides there, on *(date)* _____ , and mailed a copy to the individual's last known address; or

❒ I served the summons on *(name of individual)* _____ , who is designated by law to accept service of process on behalf of *(name of organization)* _____ on *(date)* _____ ; or

❒ I returned the summons unexecuted because _____ ; or

❒ Other *(specify):*

My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc:

Print

ATTACHMENT A

Defendants

Proud Boys International, L.L.C.

Oath Keepers

Ryan Ashlock

Joseph Randall Biggs

Marc Anthony Bru

Thomas Edward Caldwell

William Chrestman

Louis Enrique Colon

Donovan Ray Crowl

Nicholas DeCarlo

Charles Donohoe

Kenneth Harrelson

Arthur Jackman

Joshua James

Jonathanpeter Klein

Christopher Kuehne

Connie Meggs

Kelly Meggs

Roberto A. Minuta

Ethan Nordean

Nicholas Robert Ochs

Bennie Alvin Parker

Sandra Ruth Parker

William Joseph Pepe

Dominic Pezzola

Zachary Rehl

Jon Ryan Schaffer

Daniel Lyons Scott

Laura Steele

Henry “Enrique” Tarrio

Jessica Marie Watkins

Christopher John Worrell

Graydon Young

John and Jane Does 1−50.

AO 440 (Rev. 06/12; DC 3/15) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Columbia

District of Columbia *Plaintiff(s)* v. See Attachment A *Defendant(s)*	)	Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Donovan Ray Crowl,
216 N Main St.,
Woodstock, OH 43084

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Jeannie S. Rhee
Paul, Weiss, Rifkind, Wharton & Garrison LLP
2001 K Street, NW
Washington, DC 20006-1047

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ANGELA D. CAESAR, CLERK OF COURT

Date: _____

_____
Signature of Clerk or Deputy Clerk

Civil Action No.

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____ was received by me on *(date)* _____ .

❒ I personally served the summons on the individual at *(place)* _____ on *(date)* _____ ; or

❒ I left the summons at the individual's residence or usual place of abode with *(name)* _____ , a person of suitable age and discretion who resides there, on *(date)* _____ , and mailed a copy to the individual's last known address; or

❒ I served the summons on *(name of individual)* _____ , who is designated by law to accept service of process on behalf of *(name of organization)* _____ on *(date)* _____ ; or

❒ I returned the summons unexecuted because _____ ; or

❒ Other *(specify):*

My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc:

Print

ATTACHMENT A

Defendants

Proud Boys International, L.L.C.

Oath Keepers

Ryan Ashlock

Joseph Randall Biggs

Marc Anthony Bru

Thomas Edward Caldwell

William Chrestman

Louis Enrique Colon

Donovan Ray Crowl

Nicholas DeCarlo

Charles Donohoe

Kenneth Harrelson

Arthur Jackman

Joshua James

Jonathanpeter Klein

Christopher Kuehne

Connie Meggs

Kelly Meggs

Roberto A. Minuta

Ethan Nordean

Nicholas Robert Ochs

Bennie Alvin Parker

Sandra Ruth Parker

William Joseph Pepe

Dominic Pezzola

Zachary Rehl

Jon Ryan Schaffer

Daniel Lyons Scott

Laura Steele

Henry “Enrique” Tarrio

Jessica Marie Watkins

Christopher John Worrell

Graydon Young

John and Jane Does 1−50.

AO 440 (Rev. 06/12; DC 3/15) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Columbia

District of Columbia *Plaintiff(s)* v. See Attachment A *Defendant(s)*	)	Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Nicholas DeCarlo
712 SW Sunset Lane
Burleson, TX
76028-5220

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Jeannie S. Rhee
Paul, Weiss, Rifkind, Wharton & Garrison LLP
2001 K Street, NW
Washington, DC 20006-1047

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ANGELA D. CAESAR, CLERK OF COURT

Date: _____

_____
Signature of Clerk or Deputy Clerk

Civil Action No.

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____ was received by me on *(date)* _____ .

❒ I personally served the summons on the individual at *(place)* _____ on *(date)* _____ ; or

❒ I left the summons at the individual's residence or usual place of abode with *(name)* _____ , a person of suitable age and discretion who resides there, on *(date)* _____ , and mailed a copy to the individual's last known address; or

❒ I served the summons on *(name of individual)* _____ , who is designated by law to accept service of process on behalf of *(name of organization)* _____ on *(date)* _____ ; or

❒ I returned the summons unexecuted because _____ ; or

❒ Other *(specify):*

My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc:

Print

ATTACHMENT A

Defendants

Proud Boys International, L.L.C.

Oath Keepers

Ryan Ashlock

Joseph Randall Biggs

Marc Anthony Bru

Thomas Edward Caldwell

William Chrestman

Louis Enrique Colon

Donovan Ray Crowl

Nicholas DeCarlo

Charles Donohoe

Kenneth Harrelson

Arthur Jackman

Joshua James

Jonathanpeter Klein

Christopher Kuehne

Connie Meggs

Kelly Meggs

Roberto A. Minuta

Ethan Nordean

Nicholas Robert Ochs

Bennie Alvin Parker

Sandra Ruth Parker

William Joseph Pepe

Dominic Pezzola

Zachary Rehl

Jon Ryan Schaffer

Daniel Lyons Scott

Laura Steele

Henry “Enrique” Tarrio

Jessica Marie Watkins

Christopher John Worrell

Graydon Young

John and Jane Does 1−50.

AO 440 (Rev. 06/12; DC 3/15) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Columbia

District of Columbia *Plaintiff(s)* v. See Attachment A *Defendant(s)*	))))))))))))	Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Charles Donohoe
c/o NC Detention Center
125 Court Street
Hillsborough, NC 27278
Orange County

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Jeannie S. Rhee
Paul, Weiss, Rifkind, Wharton & Garrison LLP
2001 K Street, NW
Washington, DC 20006-1047

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ANGELA D. CAESAR, CLERK OF COURT

Date: _____

_____
Signature of Clerk or Deputy Clerk

Civil Action No.

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____ was received by me on *(date)* _____ .

❒ I personally served the summons on the individual at *(place)* _____ on *(date)* _____ ; or

❒ I left the summons at the individual's residence or usual place of abode with *(name)* _____ , a person of suitable age and discretion who resides there, on *(date)* _____ , and mailed a copy to the individual's last known address; or

❒ I served the summons on *(name of individual)* _____ , who is designated by law to accept service of process on behalf of *(name of organization)* _____ on *(date)* _____ ; or

❒ I returned the summons unexecuted because _____ ; or

❒ Other *(specify):*

My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc:

Print

ATTACHMENT A

Defendants

Proud Boys International, L.L.C.

Oath Keepers

Ryan Ashlock

Joseph Randall Biggs

Marc Anthony Bru

Thomas Edward Caldwell

William Chrestman

Louis Enrique Colon

Donovan Ray Crowl

Nicholas DeCarlo

Charles Donohoe

Kenneth Harrelson

Arthur Jackman

Joshua James

Jonathanpeter Klein

Christopher Kuehne

Connie Meggs

Kelly Meggs

Roberto A. Minuta

Ethan Nordean

Nicholas Robert Ochs

Bennie Alvin Parker

Sandra Ruth Parker

William Joseph Pepe

Dominic Pezzola

Zachary Rehl

Jon Ryan Schaffer

Daniel Lyons Scott

Laura Steele

Henry “Enrique” Tarrio

Jessica Marie Watkins

Christopher John Worrell

Graydon Young

John and Jane Does 1−50.

AO 440 (Rev. 06/12; DC 3/15) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Columbia

District of Columbia *Plaintiff(s)* v. See Attachment A *Defendant(s)*	)	Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Kenneth Harrelson
c/o Seminole County Jail,
211 Eslinger Way,
Sanford, FL 32773

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Jeannie S. Rhee
Paul, Weiss, Rifkind, Wharton & Garrison LLP
2001 K Street, NW
Washington, DC 20006-1047

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ANGELA D. CAESAR, CLERK OF COURT

Date: _____

_____
Signature of Clerk or Deputy Clerk

Civil Action No.

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____ was received by me on *(date)* _____ .

❒ I personally served the summons on the individual at *(place)* _____ on *(date)* _____ ; or

❒ I left the summons at the individual's residence or usual place of abode with *(name)* _____ , a person of suitable age and discretion who resides there, on *(date)* _____ , and mailed a copy to the individual's last known address; or

❒ I served the summons on *(name of individual)* _____ , who is designated by law to accept service of process on behalf of *(name of organization)* _____ on *(date)* _____ ; or

❒ I returned the summons unexecuted because _____ ; or

❒ Other *(specify):*

My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc:

Print

ATTACHMENT A

Defendants

Proud Boys International, L.L.C.

Oath Keepers

Ryan Ashlock

Joseph Randall Biggs

Marc Anthony Bru

Thomas Edward Caldwell

William Chrestman

Louis Enrique Colon

Donovan Ray Crowl

Nicholas DeCarlo

Charles Donohoe

Kenneth Harrelson

Arthur Jackman

Joshua James

Jonathanpeter Klein

Christopher Kuehne

Connie Meggs

Kelly Meggs

Roberto A. Minuta

Ethan Nordean

Nicholas Robert Ochs

Bennie Alvin Parker

Sandra Ruth Parker

William Joseph Pepe

Dominic Pezzola

Zachary Rehl

Jon Ryan Schaffer

Daniel Lyons Scott

Laura Steele

Henry “Enrique” Tarrio

Jessica Marie Watkins

Christopher John Worrell

Graydon Young

John and Jane Does 1−50.

AO 440 (Rev. 06/12; DC 3/15) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Columbia

District of Columbia *Plaintiff(s)* v. See Attachment A *Defendant(s)*	))))))))))))	Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Arthur Jackman,
4030 N. Econlockhatchee Trail
Orlando, Fl. 32817-1327

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Jeannie S. Rhee
Paul, Weiss, Rifkind, Wharton & Garrison LLP
2001 K Street, NW
Washington, DC 20006-1047

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ANGELA D. CAESAR, CLERK OF COURT

Date: _____

_____
Signature of Clerk or Deputy Clerk

Civil Action No.

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____ was received by me on *(date)* _____ .

❒ I personally served the summons on the individual at *(place)* _____ on *(date)* _____ ; or

❒ I left the summons at the individual's residence or usual place of abode with *(name)* _____ , a person of suitable age and discretion who resides there, on *(date)* _____ , and mailed a copy to the individual's last known address; or

❒ I served the summons on *(name of individual)* _____ , who is designated by law to accept service of process on behalf of *(name of organization)* _____ on *(date)* _____ ; or

❒ I returned the summons unexecuted because _____ ; or

❒ Other *(specify):*

My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc:

Print

ATTACHMENT A

Defendants

Proud Boys International, L.L.C.

Oath Keepers

Ryan Ashlock

Joseph Randall Biggs

Marc Anthony Bru

Thomas Edward Caldwell

William Chrestman

Louis Enrique Colon

Donovan Ray Crowl

Nicholas DeCarlo

Charles Donohoe

Kenneth Harrelson

Arthur Jackman

Joshua James

Jonathanpeter Klein

Christopher Kuehne

Connie Meggs

Kelly Meggs

Roberto A. Minuta

Ethan Nordean

Nicholas Robert Ochs

Bennie Alvin Parker

Sandra Ruth Parker

William Joseph Pepe

Dominic Pezzola

Zachary Rehl

Jon Ryan Schaffer

Daniel Lyons Scott

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Jessica Marie Watkins

Christopher John Worrell

Graydon Young

John and Jane Does 1−50.

AO 440 (Rev. 06/12; DC 3/15) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Columbia

District of Columbia *Plaintiff(s)* v. See Attachment A *Defendant(s)*	))))))))))))	Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Joshua James,
1463 Brashiers Chapel Rd.,
Arab, AL 35016-2727

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Jeannie S. Rhee
Paul, Weiss, Rifkind, Wharton & Garrison LLP
2001 K Street, NW
Washington, DC 20006-1047

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ANGELA D. CAESAR, CLERK OF COURT

Date: _____

_____
Signature of Clerk or Deputy Clerk

Civil Action No.

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____ was received by me on *(date)* _____ .

❒ I personally served the summons on the individual at *(place)* _____ on *(date)* _____ ; or

❒ I left the summons at the individual's residence or usual place of abode with *(name)* _____ , a person of suitable age and discretion who resides there, on *(date)* _____ , and mailed a copy to the individual's last known address; or

❒ I served the summons on *(name of individual)* _____ , who is designated by law to accept service of process on behalf of *(name of organization)* _____ on *(date)* _____ ; or

❒ I returned the summons unexecuted because _____ ; or

❒ Other *(specify):*

My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc:

Print

ATTACHMENT A

Defendants

Proud Boys International, L.L.C.

Oath Keepers

Ryan Ashlock

Joseph Randall Biggs

Marc Anthony Bru

Thomas Edward Caldwell

William Chrestman

Louis Enrique Colon

Donovan Ray Crowl

Nicholas DeCarlo

Charles Donohoe

Kenneth Harrelson

Arthur Jackman

Joshua James

Jonathanpeter Klein

Christopher Kuehne

Connie Meggs

Kelly Meggs

Roberto A. Minuta

Ethan Nordean

Nicholas Robert Ochs

Bennie Alvin Parker

Sandra Ruth Parker

William Joseph Pepe

Dominic Pezzola

Zachary Rehl

Jon Ryan Schaffer

Daniel Lyons Scott

Laura Steele

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Jessica Marie Watkins

Christopher John Worrell

Graydon Young

John and Jane Does 1−50.

AO 440 (Rev. 06/12; DC 3/15) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Columbia

District of Columbia *Plaintiff(s)* v. See Attachment A *Defendant(s)*	))))))))))))	Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Jonathanpeter Klein
c/o 21 SE 10th St.
Pendleton, OR 97801-2401

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Jeannie S. Rhee
Paul, Weiss, Rifkind, Wharton & Garrison LLP
2001 K Street, NW
Washington, DC 20006-1047

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ANGELA D. CAESAR, CLERK OF COURT

Date: _____

_____
Signature of Clerk or Deputy Clerk

Civil Action No.

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____ was received by me on *(date)* _____ .

❒ I personally served the summons on the individual at *(place)* _____ on *(date)* _____ ; or

❒ I left the summons at the individual's residence or usual place of abode with *(name)* _____ , a person of suitable age and discretion who resides there, on *(date)* _____ , and mailed a copy to the individual's last known address; or

❒ I served the summons on *(name of individual)* _____ , who is designated by law to accept service of process on behalf of *(name of organization)* _____ on *(date)* _____ ; or

❒ I returned the summons unexecuted because _____ ; or

❒ Other *(specify):*

My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc:

Print

ATTACHMENT A

Defendants

Proud Boys International, L.L.C.

Oath Keepers

Ryan Ashlock

Joseph Randall Biggs

Marc Anthony Bru

Thomas Edward Caldwell

William Chrestman

Louis Enrique Colon

Donovan Ray Crowl

Nicholas DeCarlo

Charles Donohoe

Kenneth Harrelson

Arthur Jackman

Joshua James

Jonathanpeter Klein

Christopher Kuehne

Connie Meggs

Kelly Meggs

Roberto A. Minuta

Ethan Nordean

Nicholas Robert Ochs

Bennie Alvin Parker

Sandra Ruth Parker

William Joseph Pepe

Dominic Pezzola

Zachary Rehl

Jon Ryan Schaffer

Daniel Lyons Scott

Laura Steele

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Jessica Marie Watkins

Christopher John Worrell

Graydon Young

John and Jane Does 1−50.

AO 440 (Rev. 06/12; DC 3/15) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Columbia

District of Columbia *Plaintiff(s)* v. See Attachment A *Defendant(s)*	)	Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Christopher Kuehne,
16657 S. Chalet Dr.,
Olathe, KS 66062-2513

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Jeannie S. Rhee
Paul, Weiss, Rifkind, Wharton & Garrison LLP
2001 K Street, NW
Washington, DC 20006-1047

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ANGELA D. CAESAR, CLERK OF COURT

Date: _____

_____
Signature of Clerk or Deputy Clerk

Civil Action No.

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____ was received by me on *(date)* _____ .

❒ I personally served the summons on the individual at *(place)* _____ on *(date)* _____ ; or

❒ I left the summons at the individual's residence or usual place of abode with *(name)* _____ , a person of suitable age and discretion who resides there, on *(date)* _____ , and mailed a copy to the individual's last known address; or

❒ I served the summons on *(name of individual)* _____ , who is designated by law to accept service of process on behalf of *(name of organization)* _____ on *(date)* _____ ; or

❒ I returned the summons unexecuted because _____ ; or

❒ Other *(specify):*

My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc:

Print

ATTACHMENT A

Defendants

Proud Boys International, L.L.C.

Oath Keepers

Ryan Ashlock

Joseph Randall Biggs

Marc Anthony Bru

Thomas Edward Caldwell

William Chrestman

Louis Enrique Colon

Donovan Ray Crowl

Nicholas DeCarlo

Charles Donohoe

Kenneth Harrelson

Arthur Jackman

Joshua James

Jonathanpeter Klein

Christopher Kuehne

Connie Meggs

Kelly Meggs

Roberto A. Minuta

Ethan Nordean

Nicholas Robert Ochs

Bennie Alvin Parker

Sandra Ruth Parker

William Joseph Pepe

Dominic Pezzola

Zachary Rehl

Jon Ryan Schaffer

Daniel Lyons Scott

Laura Steele

Henry “Enrique” Tarrio

Jessica Marie Watkins

Christopher John Worrell

Graydon Young

John and Jane Does 1−50.

AO 440 (Rev. 06/12; DC 3/15) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Columbia

District of Columbia *Plaintiff(s)* v. See Attachment A *Defendant(s)*	))))))))))))	Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Connie Meggs,
14100 SW 101st Ln.,
Dunnellon, FL. 34432-4700

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Jeannie S. Rhee
Paul, Weiss, Rifkind, Wharton & Garrison LLP
2001 K Street, NW
Washington, DC 20006-1047

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ANGELA D. CAESAR, CLERK OF COURT

Date: _____

_____
Signature of Clerk or Deputy Clerk

Civil Action No.

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____ was received by me on *(date)* _____ .

❒ I personally served the summons on the individual at *(place)* _____ on *(date)* _____ ; or

❒ I left the summons at the individual's residence or usual place of abode with *(name)* _____ , a person of suitable age and discretion who resides there, on *(date)* _____ , and mailed a copy to the individual's last known address; or

❒ I served the summons on *(name of individual)* _____ , who is designated by law to accept service of process on behalf of *(name of organization)* _____ on *(date)* _____ ; or

❒ I returned the summons unexecuted because _____ ; or

❒ Other *(specify):*

My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc:

Print

ATTACHMENT A

Defendants

Proud Boys International, L.L.C.

Oath Keepers

Ryan Ashlock

Joseph Randall Biggs

Marc Anthony Bru

Thomas Edward Caldwell

William Chrestman

Louis Enrique Colon

Donovan Ray Crowl

Nicholas DeCarlo

Charles Donohoe

Kenneth Harrelson

Arthur Jackman

Joshua James

Jonathanpeter Klein

Christopher Kuehne

Connie Meggs

Kelly Meggs

Roberto A. Minuta

Ethan Nordean

Nicholas Robert Ochs

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Jon Ryan Schaffer

Daniel Lyons Scott

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Jessica Marie Watkins

Christopher John Worrell

Graydon Young

John and Jane Does 1−50.

AO 440 (Rev. 06/12; DC 3/15) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Columbia

District of Columbia *Plaintiff(s)* v. See Attachment A *Defendant(s)*	))))))))))))	Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Kelly Meggs
DCDC # 376780
c/o Correctional Treatment Facility,
1901 E. St., SE,
Washington, D.C. 20003

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Jeannie S. Rhee
Paul, Weiss, Rifkind, Wharton & Garrison LLP
2001 K Street, NW
Washington, DC 20006-1047

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ANGELA D. CAESAR, CLERK OF COURT

Date: _____

_____
Signature of Clerk or Deputy Clerk

Civil Action No.

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____ was received by me on *(date)* _____ .

❒ I personally served the summons on the individual at *(place)* _____ on *(date)* _____ ; or

❒ I left the summons at the individual's residence or usual place of abode with *(name)* _____ , a person of suitable age and discretion who resides there, on *(date)* _____ , and mailed a copy to the individual's last known address; or

❒ I served the summons on *(name of individual)* _____ , who is designated by law to accept service of process on behalf of *(name of organization)* _____ on *(date)* _____ ; or

❒ I returned the summons unexecuted because _____ ; or

❒ Other *(specify):*

My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc:

Print

ATTACHMENT A

Defendants

Proud Boys International, L.L.C.

Oath Keepers

Ryan Ashlock

Joseph Randall Biggs

Marc Anthony Bru

Thomas Edward Caldwell

William Chrestman

Louis Enrique Colon

Donovan Ray Crowl

Nicholas DeCarlo

Charles Donohoe

Kenneth Harrelson

Arthur Jackman

Joshua James

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Christopher Kuehne

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Christopher John Worrell

Graydon Young

John and Jane Does 1−50.

AO 440 (Rev. 06/12; DC 3/15) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Columbia

District of Columbia *Plaintiff(s)* v. See Attachment A *Defendant(s)*	))))))))))))	Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Roberto A. Minuta,
120 Gray LN
Prosper, TX 75078-3010

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Jeannie S. Rhee
Paul, Weiss, Rifkind, Wharton & Garrison LLP
2001 K Street, NW
Washington, DC 20006-1047

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ANGELA D. CAESAR, CLERK OF COURT

Date: _____

_____
Signature of Clerk or Deputy Clerk

Civil Action No.

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____ was received by me on *(date)* _____ .

❒ I personally served the summons on the individual at *(place)* _____ on *(date)* _____ ; or

❒ I left the summons at the individual's residence or usual place of abode with *(name)* _____ , a person of suitable age and discretion who resides there, on *(date)* _____ , and mailed a copy to the individual's last known address; or

❒ I served the summons on *(name of individual)* _____ , who is designated by law to accept service of process on behalf of *(name of organization)* _____ on *(date)* _____ ; or

❒ I returned the summons unexecuted because _____ ; or

❒ Other *(specify):*

My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc:

Print

ATTACHMENT A

Defendants

Proud Boys International, L.L.C.

Oath Keepers

Ryan Ashlock

Joseph Randall Biggs

Marc Anthony Bru

Thomas Edward Caldwell

William Chrestman

Louis Enrique Colon

Donovan Ray Crowl

Nicholas DeCarlo

Charles Donohoe

Kenneth Harrelson

Arthur Jackman

Joshua James

Jonathanpeter Klein

Christopher Kuehne

Connie Meggs

Kelly Meggs

Roberto A. Minuta

Ethan Nordean

Nicholas Robert Ochs

Bennie Alvin Parker

Sandra Ruth Parker

William Joseph Pepe

Dominic Pezzola

Zachary Rehl

Jon Ryan Schaffer

Daniel Lyons Scott

Laura Steele

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Jessica Marie Watkins

Christopher John Worrell

Graydon Young

John and Jane Does 1−50.

AO 440 (Rev. 06/12; DC 3/15) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Columbia

District of Columbia *Plaintiff(s)* v. See Attachment A *Defendant(s)*	))))))))))))	Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Ethan Nordean
Inmate No. 28596-509
c/o Federal Detention Center
2425 S 200th Street
Seatac, WA 98189
King County

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Jeannie S. Rhee
Paul, Weiss, Rifkind, Wharton & Garrison LLP
2001 K Street, NW
Washington, DC 20006-1047

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ANGELA D. CAESAR, CLERK OF COURT

Date: _____

_____
Signature of Clerk or Deputy Clerk

Civil Action No.

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____ was received by me on *(date)* _____ .

❒ I personally served the summons on the individual at *(place)* _____ on *(date)* _____ ; or

❒ I left the summons at the individual's residence or usual place of abode with *(name)* _____ , a person of suitable age and discretion who resides there, on *(date)* _____ , and mailed a copy to the individual's last known address; or

❒ I served the summons on *(name of individual)* _____ , who is designated by law to accept service of process on behalf of *(name of organization)* _____ on *(date)* _____ ; or

❒ I returned the summons unexecuted because _____ ; or

❒ Other *(specify):*

My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc:

Print

ATTACHMENT A

Defendants

Proud Boys International, L.L.C.

Oath Keepers

Ryan Ashlock

Joseph Randall Biggs

Marc Anthony Bru

Thomas Edward Caldwell

William Chrestman

Louis Enrique Colon

Donovan Ray Crowl

Nicholas DeCarlo

Charles Donohoe

Kenneth Harrelson

Arthur Jackman

Joshua James

Jonathanpeter Klein

Christopher Kuehne

Connie Meggs

Kelly Meggs

Roberto A. Minuta

Ethan Nordean

Nicholas Robert Ochs

Bennie Alvin Parker

Sandra Ruth Parker

William Joseph Pepe

Dominic Pezzola

Zachary Rehl

Jon Ryan Schaffer

Daniel Lyons Scott

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Henry “Enrique” Tarrio

Jessica Marie Watkins

Christopher John Worrell

Graydon Young

John and Jane Does 1−50.

AO 440 (Rev. 06/12; DC 3/15) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Columbia

District of Columbia *Plaintiff(s)* v. See Attachment A *Defendant(s)*	))))))))))))	Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Nicholas Robert Ochs
3245 Virginia St
Apt 56,
Miami, FL 33133-5250

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Jeannie S. Rhee
Paul, Weiss, Rifkind, Wharton & Garrison LLP
2001 K Street, NW
Washington, DC 20006-1047

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ANGELA D. CAESAR, CLERK OF COURT

Date: _____

_____
Signature of Clerk or Deputy Clerk

Civil Action No.

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____ was received by me on *(date)* _____ .

❒ I personally served the summons on the individual at *(place)* _____ on *(date)* _____ ; or

❒ I left the summons at the individual's residence or usual place of abode with *(name)* _____ , a person of suitable age and discretion who resides there, on *(date)* _____ , and mailed a copy to the individual's last known address; or

❒ I served the summons on *(name of individual)* _____ , who is designated by law to accept service of process on behalf of *(name of organization)* _____ on *(date)* _____ ; or

❒ I returned the summons unexecuted because _____ ; or

❒ Other *(specify):*

My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc:

Print

ATTACHMENT A

Defendants

Proud Boys International, L.L.C.

Oath Keepers

Ryan Ashlock

Joseph Randall Biggs

Marc Anthony Bru

Thomas Edward Caldwell

William Chrestman

Louis Enrique Colon

Donovan Ray Crowl

Nicholas DeCarlo

Charles Donohoe

Kenneth Harrelson

Arthur Jackman

Joshua James

Jonathanpeter Klein

Christopher Kuehne

Connie Meggs

Kelly Meggs

Roberto A. Minuta

Ethan Nordean

Nicholas Robert Ochs

Bennie Alvin Parker

Sandra Ruth Parker

William Joseph Pepe

Dominic Pezzola

Zachary Rehl

Jon Ryan Schaffer

Daniel Lyons Scott

Laura Steele

Henry “Enrique” Tarrio

Jessica Marie Watkins

Christopher John Worrell

Graydon Young

John and Jane Does 1−50.

AO 440 (Rev. 06/12; DC 3/15) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Columbia

District of Columbia *Plaintiff(s)* v. See Attachment A *Defendant(s)*	))))))))))))	Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Bennie Alvin Parker,
1170 Essex Gln,
Morrow, OH 45152

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Jeannie S. Rhee
Paul, Weiss, Rifkind, Wharton & Garrison LLP
2001 K Street, NW
Washington, DC 20006-1047

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ANGELA D. CAESAR, CLERK OF COURT

Date: _____

_____
Signature of Clerk or Deputy Clerk

Civil Action No.

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____ was received by me on *(date)* _____ .

❒ I personally served the summons on the individual at *(place)* _____ on *(date)* _____ ; or

❒ I left the summons at the individual's residence or usual place of abode with *(name)* _____ , a person of suitable age and discretion who resides there, on *(date)* _____ , and mailed a copy to the individual's last known address; or

❒ I served the summons on *(name of individual)* _____ , who is designated by law to accept service of process on behalf of *(name of organization)* _____ on *(date)* _____ ; or

❒ I returned the summons unexecuted because _____ ; or

❒ Other *(specify):*

My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc:

Print

ATTACHMENT A

Defendants

Proud Boys International, L.L.C.

Oath Keepers

Ryan Ashlock

Joseph Randall Biggs

Marc Anthony Bru

Thomas Edward Caldwell

William Chrestman

Louis Enrique Colon

Donovan Ray Crowl

Nicholas DeCarlo

Charles Donohoe

Kenneth Harrelson

Arthur Jackman

Joshua James

Jonathanpeter Klein

Christopher Kuehne

Connie Meggs

Kelly Meggs

Roberto A. Minuta

Ethan Nordean

Nicholas Robert Ochs

Bennie Alvin Parker

Sandra Ruth Parker

William Joseph Pepe

Dominic Pezzola

Zachary Rehl

Jon Ryan Schaffer

Daniel Lyons Scott

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Jessica Marie Watkins

Christopher John Worrell

Graydon Young

John and Jane Does 1−50.

AO 440 (Rev. 06/12; DC 3/15) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Columbia

District of Columbia *Plaintiff(s)* v. See Attachment A *Defendant(s)*	))))))))))))	Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Sandra Ruth Parker,
1170 Essex Gln,
Morrow, OH 45152

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Jeannie S. Rhee
Paul, Weiss, Rifkind, Wharton & Garrison LLP
2001 K Street, NW
Washington, DC 20006-1047

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ANGELA D. CAESAR, CLERK OF COURT

Date: _____

_____
Signature of Clerk or Deputy Clerk

Civil Action No.

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____ was received by me on *(date)* _____ .

❒ I personally served the summons on the individual at *(place)* _____ on *(date)* _____ ; or

❒ I left the summons at the individual's residence or usual place of abode with *(name)* _____ , a person of suitable age and discretion who resides there, on *(date)* _____ , and mailed a copy to the individual's last known address; or

❒ I served the summons on *(name of individual)* _____ , who is designated by law to accept service of process on behalf of *(name of organization)* _____ on *(date)* _____ ; or

❒ I returned the summons unexecuted because _____ ; or

❒ Other *(specify):*

My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc:

Print

ATTACHMENT A

Defendants

Proud Boys International, L.L.C.

Oath Keepers

Ryan Ashlock

Joseph Randall Biggs

Marc Anthony Bru

Thomas Edward Caldwell

William Chrestman

Louis Enrique Colon

Donovan Ray Crowl

Nicholas DeCarlo

Charles Donohoe

Kenneth Harrelson

Arthur Jackman

Joshua James

Jonathanpeter Klein

Christopher Kuehne

Connie Meggs

Kelly Meggs

Roberto A. Minuta

Ethan Nordean

Nicholas Robert Ochs

Bennie Alvin Parker

Sandra Ruth Parker

William Joseph Pepe

Dominic Pezzola

Zachary Rehl

Jon Ryan Schaffer

Daniel Lyons Scott

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Jessica Marie Watkins

Christopher John Worrell

Graydon Young

John and Jane Does 1−50.

AO 440 (Rev. 06/12; DC 3/15) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Columbia

District of Columbia *Plaintiff(s)* v. See Attachment A *Defendant(s)*	))))))))))))	Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* William Joseph Pepe,
85 Judson St.,
Apt. 2,
Beacon, NY 12508

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Jeannie S. Rhee
Paul, Weiss, Rifkind, Wharton & Garrison LLP
2001 K Street, NW
Washington, DC 20006-1047

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ANGELA D. CAESAR, CLERK OF COURT

Date: _____

_____
Signature of Clerk or Deputy Clerk

Civil Action No.

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____ was received by me on *(date)* _____ .

❒ I personally served the summons on the individual at *(place)* _____ on *(date)* _____ ; or

❒ I left the summons at the individual's residence or usual place of abode with *(name)* _____ , a person of suitable age and discretion who resides there, on *(date)* _____ , and mailed a copy to the individual's last known address; or

❒ I served the summons on *(name of individual)* _____ , who is designated by law to accept service of process on behalf of *(name of organization)* _____ on *(date)* _____ ; or

❒ I returned the summons unexecuted because _____ ; or

❒ Other *(specify):*

My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc:

Print

ATTACHMENT A

Defendants

Proud Boys International, L.L.C.

Oath Keepers

Ryan Ashlock

Joseph Randall Biggs

Marc Anthony Bru

Thomas Edward Caldwell

William Chrestman

Louis Enrique Colon

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Nicholas DeCarlo

Charles Donohoe

Kenneth Harrelson

Arthur Jackman

Joshua James

Jonathanpeter Klein

Christopher Kuehne

Connie Meggs

Kelly Meggs

Roberto A. Minuta

Ethan Nordean

Nicholas Robert Ochs

Bennie Alvin Parker

Sandra Ruth Parker

William Joseph Pepe

Dominic Pezzola

Zachary Rehl

Jon Ryan Schaffer

Daniel Lyons Scott

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Jessica Marie Watkins

Christopher John Worrell

Graydon Young

John and Jane Does 1−50.

AO 440 (Rev. 06/12; DC 3/15) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Columbia

District of Columbia *Plaintiff(s)* v. See Attachment A *Defendant(s)*	))))))))))))	Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Dominic Pezzola
c/o Correctional Treatment Facility (CTF)
DCDC No. 376366
1901 E Street SE
Washington, DC 20003

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Jeannie S. Rhee
Paul, Weiss, Rifkind, Wharton & Garrison LLP
2001 K Street, NW
Washington, DC 20006-1047

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ANGELA D. CAESAR, CLERK OF COURT

Date: _____

_____
Signature of Clerk or Deputy Clerk

Civil Action No.

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____ was received by me on *(date)* _____ .

❒ I personally served the summons on the individual at *(place)* _____ on *(date)* _____ ; or

❒ I left the summons at the individual's residence or usual place of abode with *(name)* _____ , a person of suitable age and discretion who resides there, on *(date)* _____ , and mailed a copy to the individual's last known address; or

❒ I served the summons on *(name of individual)* _____ , who is designated by law to accept service of process on behalf of *(name of organization)* _____ on *(date)* _____ ; or

❒ I returned the summons unexecuted because _____ ; or

❒ Other *(specify):*

My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc:

Print

ATTACHMENT A

Defendants

Proud Boys International, L.L.C.

Oath Keepers

Ryan Ashlock

Joseph Randall Biggs

Marc Anthony Bru

Thomas Edward Caldwell

William Chrestman

Louis Enrique Colon

Donovan Ray Crowl

Nicholas DeCarlo

Charles Donohoe

Kenneth Harrelson

Arthur Jackman

Joshua James

Jonathanpeter Klein

Christopher Kuehne

Connie Meggs

Kelly Meggs

Roberto A. Minuta

Ethan Nordean

Nicholas Robert Ochs

Bennie Alvin Parker

Sandra Ruth Parker

William Joseph Pepe

Dominic Pezzola

Zachary Rehl

Jon Ryan Schaffer

Daniel Lyons Scott

Laura Steele

Henry “Enrique” Tarrio

Jessica Marie Watkins

Christopher John Worrell

Graydon Young

John and Jane Does 1−50.

AO 440 (Rev. 06/12; DC 3/15) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Columbia

District of Columbia *Plaintiff(s)* v. See Attachment A *Defendant(s)*	))))))))))))	Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Zachary Rehl
Inmate No. 34945-509
c/o Philadelphia Federal Detention Center
700 Arch St.
Philadelphia, PA 19106

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Jeannie S. Rhee
Paul, Weiss, Rifkind, Wharton & Garrison LLP
2001 K Street, NW
Washington, DC 20006-1047

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ANGELA D. CAESAR, CLERK OF COURT

Date: _____

_____
Signature of Clerk or Deputy Clerk

Civil Action No.

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____ was received by me on *(date)* _____ .

❒ I personally served the summons on the individual at *(place)* _____ on *(date)* _____ ; or

❒ I left the summons at the individual's residence or usual place of abode with *(name)* _____ , a person of suitable age and discretion who resides there, on *(date)* _____ , and mailed a copy to the individual's last known address; or

❒ I served the summons on *(name of individual)* _____ , who is designated by law to accept service of process on behalf of *(name of organization)* _____ on *(date)* _____ ; or

❒ I returned the summons unexecuted because _____ ; or

❒ Other *(specify):*

My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc:

Print

ATTACHMENT A

Defendants

Proud Boys International, L.L.C.

Oath Keepers

Ryan Ashlock

Joseph Randall Biggs

Marc Anthony Bru

Thomas Edward Caldwell

William Chrestman

Louis Enrique Colon

Donovan Ray Crowl

Nicholas DeCarlo

Charles Donohoe

Kenneth Harrelson

Arthur Jackman

Joshua James

Jonathanpeter Klein

Christopher Kuehne

Connie Meggs

Kelly Meggs

Roberto A. Minuta

Ethan Nordean

Nicholas Robert Ochs

Bennie Alvin Parker

Sandra Ruth Parker

William Joseph Pepe

Dominic Pezzola

Zachary Rehl

Jon Ryan Schaffer

Daniel Lyons Scott

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Jessica Marie Watkins

Christopher John Worrell

Graydon Young

John and Jane Does 1−50.

AO 440 (Rev. 06/12; DC 3/15) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Columbia

District of Columbia *Plaintiff(s)* v. See Attachment A *Defendant(s)*	))))))))))))	Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Jon Ryan Schaffer
5162 Timber Ridge Dr.,
Columbus, IN 47201-8816

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Jeannie S. Rhee
Paul, Weiss, Rifkind, Wharton & Garrison LLP
2001 K Street, NW
Washington, DC 20006-1047

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ANGELA D. CAESAR, CLERK OF COURT

Date: _____

_____
Signature of Clerk or Deputy Clerk

Civil Action No.

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____ was received by me on *(date)* _____ .

❒ I personally served the summons on the individual at *(place)* _____ on *(date)* _____ ; or

❒ I left the summons at the individual's residence or usual place of abode with *(name)* _____ , a person of suitable age and discretion who resides there, on *(date)* _____ , and mailed a copy to the individual's last known address; or

❒ I served the summons on *(name of individual)* _____ , who is designated by law to accept service of process on behalf of *(name of organization)* _____ on *(date)* _____ ; or

❒ I returned the summons unexecuted because _____ ; or

❒ Other *(specify):*

My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc:

Print

ATTACHMENT A

Defendants

Proud Boys International, L.L.C.

Oath Keepers

Ryan Ashlock

Joseph Randall Biggs

Marc Anthony Bru

Thomas Edward Caldwell

William Chrestman

Louis Enrique Colon

Donovan Ray Crowl

Nicholas DeCarlo

Charles Donohoe

Kenneth Harrelson

Arthur Jackman

Joshua James

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Christopher Kuehne

Connie Meggs

Kelly Meggs

Roberto A. Minuta

Ethan Nordean

Nicholas Robert Ochs

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Jessica Marie Watkins

Christopher John Worrell

Graydon Young

John and Jane Does 1−50.

AO 440 (Rev. 06/12; DC 3/15) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Columbia

District of Columbia *Plaintiff(s)* v. See Attachment A *Defendant(s)*	)	Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Daniel Lyons Scott
122 W Perry LN
Englewood, FL 34223-2943

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Jeannie S. Rhee
Paul, Weiss, Rifkind, Wharton & Garrison LLP
2001 K Street, NW
Washington, DC 20006-1047

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ANGELA D. CAESAR, CLERK OF COURT

Date: _____

_____
Signature of Clerk or Deputy Clerk

Civil Action No.

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____ was received by me on *(date)* _____ .

❒ I personally served the summons on the individual at *(place)* _____ on *(date)* _____ ; or

❒ I left the summons at the individual's residence or usual place of abode with *(name)* _____ , a person of suitable age and discretion who resides there, on *(date)* _____ , and mailed a copy to the individual's last known address; or

❒ I served the summons on *(name of individual)* _____ , who is designated by law to accept service of process on behalf of *(name of organization)* _____ on *(date)* _____ ; or

❒ I returned the summons unexecuted because _____ ; or

❒ Other *(specify):*

My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc:

Print

ATTACHMENT A

Defendants

Proud Boys International, L.L.C.

Oath Keepers

Ryan Ashlock

Joseph Randall Biggs

Marc Anthony Bru

Thomas Edward Caldwell

William Chrestman

Louis Enrique Colon

Donovan Ray Crowl

Nicholas DeCarlo

Charles Donohoe

Kenneth Harrelson

Arthur Jackman

Joshua James

Jonathanpeter Klein

Christopher Kuehne

Connie Meggs

Kelly Meggs

Roberto A. Minuta

Ethan Nordean

Nicholas Robert Ochs

Bennie Alvin Parker

Sandra Ruth Parker

William Joseph Pepe

Dominic Pezzola

Zachary Rehl

Jon Ryan Schaffer

Daniel Lyons Scott

Laura Steele

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Jessica Marie Watkins

Christopher John Worrell

Graydon Young

John and Jane Does 1−50.

AO 440 (Rev. 06/12; DC 3/15) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Columbia

District of Columbia *Plaintiff(s)* v. See Attachment A *Defendant(s)*	))))))))))))	Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Laura Steele,
249 Newcastle Ct.,
Thomasville, NC 27360

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Jeannie S. Rhee
Paul, Weiss, Rifkind, Wharton & Garrison LLP
2001 K Street, NW
Washington, DC 20006-1047

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ANGELA D. CAESAR, CLERK OF COURT

Date: _____

_____
Signature of Clerk or Deputy Clerk

Civil Action No.

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____ was received by me on *(date)* _____ .

❒ I personally served the summons on the individual at *(place)* _____ on *(date)* _____ ; or

❒ I left the summons at the individual's residence or usual place of abode with *(name)* _____ , a person of suitable age and discretion who resides there, on *(date)* _____ , and mailed a copy to the individual's last known address; or

❒ I served the summons on *(name of individual)* _____ , who is designated by law to accept service of process on behalf of *(name of organization)* _____ on *(date)* _____ ; or

❒ I returned the summons unexecuted because _____ ; or

❒ Other *(specify):*

My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc:

Print

ATTACHMENT A

Defendants

Proud Boys International, L.L.C.

Oath Keepers

Ryan Ashlock

Joseph Randall Biggs

Marc Anthony Bru

Thomas Edward Caldwell

William Chrestman

Louis Enrique Colon

Donovan Ray Crowl

Nicholas DeCarlo

Charles Donohoe

Kenneth Harrelson

Arthur Jackman

Joshua James

Jonathanpeter Klein

Christopher Kuehne

Connie Meggs

Kelly Meggs

Roberto A. Minuta

Ethan Nordean

Nicholas Robert Ochs

Bennie Alvin Parker

Sandra Ruth Parker

William Joseph Pepe

Dominic Pezzola

Zachary Rehl

Jon Ryan Schaffer

Daniel Lyons Scott

Laura Steele

Henry “Enrique” Tarrio

Jessica Marie Watkins

Christopher John Worrell

Graydon Young

John and Jane Does 1−50.

AO 440 (Rev. 06/12; DC 3/15) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Columbia

District of Columbia *Plaintiff(s)* v. See Attachment A *Defendant(s)*	))))))))))))	Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Henry "Enrique" Tarrio,
c/o The Central Detention Facility
DCDC No. 376128
1901 D Street, SE
Washington, DC 20003

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Jeannie S. Rhee
Paul, Weiss, Rifkind, Wharton & Garrison LLP
2001 K Street, NW
Washington, DC 20006-1047

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ANGELA D. CAESAR, CLERK OF COURT

Date: _____

_____
Signature of Clerk or Deputy Clerk

Civil Action No.

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____ was received by me on *(date)* _____ .

❒ I personally served the summons on the individual at *(place)* _____ on *(date)* _____ ; or

❒ I left the summons at the individual's residence or usual place of abode with *(name)* _____ , a person of suitable age and discretion who resides there, on *(date)* _____ , and mailed a copy to the individual's last known address; or

❒ I served the summons on *(name of individual)* _____ , who is designated by law to accept service of process on behalf of *(name of organization)* _____ on *(date)* _____ ; or

❒ I returned the summons unexecuted because _____ ; or

❒ Other *(specify):*

My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc:

Print

ATTACHMENT A

Defendants

Proud Boys International, L.L.C.

Oath Keepers

Ryan Ashlock

Joseph Randall Biggs

Marc Anthony Bru

Thomas Edward Caldwell

William Chrestman

Louis Enrique Colon

Donovan Ray Crowl

Nicholas DeCarlo

Charles Donohoe

Kenneth Harrelson

Arthur Jackman

Joshua James

Jonathanpeter Klein

Christopher Kuehne

Connie Meggs

Kelly Meggs

Roberto A. Minuta

Ethan Nordean

Nicholas Robert Ochs

Bennie Alvin Parker

Sandra Ruth Parker

William Joseph Pepe

Dominic Pezzola

Zachary Rehl

Jon Ryan Schaffer

Daniel Lyons Scott

Laura Steele

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Jessica Marie Watkins

Christopher John Worrell

Graydon Young

John and Jane Does 1−50.

AO 440 (Rev. 06/12; DC 3/15) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Columbia

District of Columbia *Plaintiff(s)* v. See Attachment A *Defendant(s)*	))))))))))))	Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Jessica Marie Watkins
DCDC # 376520
c/o Correctional Treatment Facility,
1901 E. St., SE,
Washington, D.C. 20003

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Jeannie S. Rhee
Paul, Weiss, Rifkind, Wharton & Garrison LLP
2001 K Street, NW
Washington, DC 20006-1047

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ANGELA D. CAESAR, CLERK OF COURT

Date: _____

_____
Signature of Clerk or Deputy Clerk

Civil Action No.

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____ was received by me on *(date)* _____ .

❒ I personally served the summons on the individual at *(place)* _____ on *(date)* _____ ; or

❒ I left the summons at the individual's residence or usual place of abode with *(name)* _____ , a person of suitable age and discretion who resides there, on *(date)* _____ , and mailed a copy to the individual's last known address; or

❒ I served the summons on *(name of individual)* _____ , who is designated by law to accept service of process on behalf of *(name of organization)* _____ on *(date)* _____ ; or

❒ I returned the summons unexecuted because _____ ; or

❒ Other *(specify):*

My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc:

Print

ATTACHMENT A

Defendants

Proud Boys International, L.L.C.

Oath Keepers

Ryan Ashlock

Joseph Randall Biggs

Marc Anthony Bru

Thomas Edward Caldwell

William Chrestman

Louis Enrique Colon

Donovan Ray Crowl

Nicholas DeCarlo

Charles Donohoe

Kenneth Harrelson

Arthur Jackman

Joshua James

Jonathanpeter Klein

Christopher Kuehne

Connie Meggs

Kelly Meggs

Roberto A. Minuta

Ethan Nordean

Nicholas Robert Ochs

Bennie Alvin Parker

Sandra Ruth Parker

William Joseph Pepe

Dominic Pezzola

Zachary Rehl

Jon Ryan Schaffer

Daniel Lyons Scott

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Jessica Marie Watkins

Christopher John Worrell

Graydon Young

John and Jane Does 1−50.

AO 440 (Rev. 06/12; DC 3/15) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Columbia

District of Columbia *Plaintiff(s)* v. See Attachment A *Defendant(s)*	))))))))))))	Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Christopher John Worrell
282 Stanhope Circle
Naples, FL 34104-0810

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Jeannie S. Rhee
Paul, Weiss, Rifkind, Wharton & Garrison LLP
2001 K Street, NW
Washington, DC 20006-1047

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ANGELA D. CAESAR, CLERK OF COURT

Date: _____

_____
Signature of Clerk or Deputy Clerk

Civil Action No.

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____ was received by me on *(date)* _____ .

❒ I personally served the summons on the individual at *(place)* _____ on *(date)* _____ ; or

❒ I left the summons at the individual's residence or usual place of abode with *(name)* _____ , a person of suitable age and discretion who resides there, on *(date)* _____ , and mailed a copy to the individual's last known address; or

❒ I served the summons on *(name of individual)* _____ , who is designated by law to accept service of process on behalf of *(name of organization)* _____ on *(date)* _____ ; or

❒ I returned the summons unexecuted because _____ ; or

❒ Other *(specify):*

My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc:

Print

ATTACHMENT A

Defendants

Proud Boys International, L.L.C.

Oath Keepers

Ryan Ashlock

Joseph Randall Biggs

Marc Anthony Bru

Thomas Edward Caldwell

William Chrestman

Louis Enrique Colon

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Nicholas DeCarlo

Charles Donohoe

Kenneth Harrelson

Arthur Jackman

Joshua James

Jonathanpeter Klein

Christopher Kuehne

Connie Meggs

Kelly Meggs

Roberto A. Minuta

Ethan Nordean

Nicholas Robert Ochs

Bennie Alvin Parker

Sandra Ruth Parker

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Dominic Pezzola

Zachary Rehl

Jon Ryan Schaffer

Daniel Lyons Scott

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Jessica Marie Watkins

Christopher John Worrell

Graydon Young

John and Jane Does 1−50.

AO 440 (Rev. 06/12; DC 3/15) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Columbia

District of Columbia *Plaintiff(s)* v. See Attachment A *Defendant(s)*	))))))))))))	Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Graydon Young,
7147 Lago St.,
Sarasota, FL 34241

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Jeannie S. Rhee
Paul, Weiss, Rifkind, Wharton & Garrison LLP
2001 K Street, NW
Washington, DC 20006-1047

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ANGELA D. CAESAR, CLERK OF COURT

Date: _____

_____
Signature of Clerk or Deputy Clerk

Civil Action No.

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____ was received by me on *(date)* _____ .

❒ I personally served the summons on the individual at *(place)* _____ on *(date)* _____ ; or

❒ I left the summons at the individual's residence or usual place of abode with *(name)* _____ , a person of suitable age and discretion who resides there, on *(date)* _____ , and mailed a copy to the individual's last known address; or

❒ I served the summons on *(name of individual)* _____ , who is designated by law to accept service of process on behalf of *(name of organization)* _____ on *(date)* _____ ; or

❒ I returned the summons unexecuted because _____ ; or

❒ Other *(specify):*

My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc:

Print

ATTACHMENT A

Defendants

Proud Boys International, L.L.C.

Oath Keepers

Ryan Ashlock

Joseph Randall Biggs

Marc Anthony Bru

Thomas Edward Caldwell

William Chrestman

Louis Enrique Colon

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Nicholas DeCarlo

Charles Donohoe

Kenneth Harrelson

Arthur Jackman

Joshua James

Jonathanpeter Klein

Christopher Kuehne

Connie Meggs

Kelly Meggs

Roberto A. Minuta

Ethan Nordean

Nicholas Robert Ochs

Bennie Alvin Parker

Sandra Ruth Parker

William Joseph Pepe

Dominic Pezzola

Zachary Rehl

Jon Ryan Schaffer

Daniel Lyons Scott

Laura Steele

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Jessica Marie Watkins

Christopher John Worrell

Graydon Young

John and Jane Does 1−50.