IN THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
Civil Division

OYOMA ASINOR
1357 R Street N.W., Apt. 706
Washington, D.C. 20005

BRYAN DOZIER
1536 2nd Street, S.W.
Washington, D.C. 20009,
Plaintiffs,

v.

DISTRICT OF COLUMBIA,
c/o Mayor and Office of the Attorney General for the District of Columbia
400 6th Street, N.W.
Washington, D.C. 20001,

COMMANDER ROBERT GLOVER,
c/o District of Columbia Metropolitan Police Department
2850 New York Avenue, N.E.
Washington, D.C. 20002,

OFFICER SHAWN CALDWELL
c/o District of Columbia Metropolitan Police Department
2850 New York Avenue, N.E.
Washington, D.C. 20002,
Defendants.

No. _____

JURY TRIAL DEMANDED

COMPLAINT FOR DAMAGES
(Violation of D.C.-law rights of journalists covering racial justice protests)

INTRODUCTION

Plaintiffs challenge the use of chemical irritants and stun grenades by the Metropolitan Police Department (MPD) to disperse demonstrations—tactics that the D.C. Council banned MPD

from deploying on July 22, 2020. Just over one month later, on August 29, 2020, MPD officers used them anyway. That night, people gathered near what was then known as Black Lives Matter Plaza ("BLM Plaza") to protest racism and brutality in policing. MPD officers, some clad in riot gear and wielding batons, unjustifiably deployed chemical irritants and stun grenades against demonstrators and journalists, including Plaintiffs Oyoma Asinor and Bryan Dozier, photojournalists who were seeking to document the demonstration. The weapons caused both Plaintiffs to suffer severe pain and emotional distress. Plaintiffs now seek compensation for the injuries they sustained due to the Defendants' illegal acts.

JURISDICTION AND VENUE

1. Plaintiffs' claims arise under the First Amendment Assemblies Act, D.C. Code § 5-331.01 *et seq.*, and the common law of the District of Columbia. All the alleged misconduct occurred in the District of Columbia.

2. Plaintiffs' statutory and common law claims are timely. The applicable statutes of limitations were tolled during the pendency of the Plaintiffs' related federal action in the United States District Court for the District of Columbia, captioned *Asinor v. District of Columbia,* No. 1:21-cv-02158 (APM), in which the claims brought here were dismissed on October 21, 2026. *See* 28 U.S.C. § 1367(d).

PARTIES

3. Plaintiff Oyoma Asinor is a resident of the District of Columbia. He attended a protest at or near BLM Plaza, the stretch of 16th Street NW between H Street and K Street, during the late-night hours of August 29, 2020 and into the early morning of August 30, 2020. His purpose was to document the demonstrations as an independent photojournalist.

4. Plaintiff Bryan Dozier is a resident of the District of Columbia. He attended a protest at or near BLM Plaza during the late-night hours of August 29, 2020 and into the early morning of August 30, 2020 to photograph the demonstration as an independent photojournalist.

5. Defendants Robert Glover and Shawn Caldwell are officers of the District of Columbia Metropolitan Police Department (MPD). At the time of the events at issue, the defendants were acting within the scope of their employment and under color of law of the District of Columbia. They are sued in their individual capacities.

6. At the time of the events at issue, Unidentified MPD Officers 1–3 were acting within the scope of their employment and on behalf of and in the interests of MPD. The District of Columbia is sued for these officers' unlawful conduct under the doctrine of *respondeat superior*.

7. Defendant District of Columbia is a municipal corporation, the local government of Washington, D.C. It operates and governs MPD pursuant to the laws of the District of Columbia. In this case, the District acted through its agents, employees, and servants, including Defendants Robert Glover and Shawn Caldwell, as well as Unidentified MPD Officers 1–3.

FACTUAL ALLEGATIONS

The District of Columbia Bans MPD Use of Chemical Irritants and Less-Lethal Projectiles

8. In the summer of 2020, following the police killings of George Floyd and Breonna Taylor, mass protests against police brutality occurred throughout the District of Columbia.

9. These demonstrations were often themselves met with police brutality. Throughout the summer, MPD officers used a wide range of weapons—from chemical irritants to stun grenades—to disperse crowds of demonstrators. MPD's tactics prompted the D.C. Council to unanimously pass emergency legislation in July 2020 banning police officers from using chemical irritants and less-lethal projectiles at demonstrations (in the language of the D.C. Code, "First Amendment

assemblies"). Specifically, the legislation stated that "[c]hemical irritants" and "[l]ess-lethal projectiles" "shall not be used by MPD to disperse a First Amendment assembly." Comprehensive Policing and Justice Reform Second Emergency Amendment Act of 2020 § 121(b) (July 22, 2020). It was signed by the Mayor on July 22 and became effective on that date. *See* 67 D.C. Reg. 9148 (July 31, 2020).

10. The statute defines "[c]hemical irritant" as "tear gas or any chemical that can rapidly produce sensory irritation or disabling physical effects in humans, which disappear within a short time following termination of exposure, or any substance prohibited by the Convention on the Prohibition of the Development, Production, Stockpiling and Use of Chemical Weapons and on their Destruction, effective April 29, 1997." *Id.* § 121(a)(2).

11. The statute defines "[l]ess-lethal projectiles" as "any munition that may cause bodily injury or death through the transfer of kinetic energy and blunt force trauma," including "rubber or foam-covered bullets and stun grenades." *Id.* § 121(a)(3).

12. A stun grenade, also called a "flash-bang," is an explosive device that causes people to experience disorientation by producing an intensely bright flash of light, which overstimulates the eye's photoreceptors and causes blindness for several seconds. Stun grenades detonate at 170 to 180 decibels, a volume that causes temporary deafness and exceeds the human pain threshold for sound (130 decibels) when they detonate near a person. The pressure waves created by stun grenades disrupt the fluid in the inner ear, causing dizziness and confusion.

13. The legislation added new weapons prohibitions to the First Amendment Assemblies Act, D.C. Code § 5-331.01 *et seq*., which is "intended to protect persons who are exercising First Amendment rights in the District of Columbia," D.C. Code § 5-331.17, and which sets forth the District's policy that "[p]ersons and groups have a right to organize and participate in peaceful

First Amendment assemblies on the streets, sidewalks, and other public ways," D.C. Code § 5-331.03. The D.C. Council passed the First Amendment Assemblies Act following a Council investigation of MPD's unlawful handling of prior demonstrations; it was "a response to . . . law enforcement based on the past record" as well as an "affirm[ation of] the importance of the exercise of First Amendment rights." D.C. Council Comm. on the Judiciary, Report on Bill No. 15-968 at 1 (Dec. 1, 2004) (referencing prior demonstrations including "anti-globalization demonstrations between 2000 and 2002," and noting that the Council was enacting safeguards that were "first proposed in litigation following the 1971 'May Day' demonstrations against the Vietnam war").

The August 29, 2020 Attack

14. Plaintiffs Oyoma Asinor and Bryan Dozier are photojournalists who have previously photographed demonstrations in the District. Starting in June 2020, Plaintiffs documented demonstrations against police brutality through the District on a near-daily basis.

15. Mr. Dozier's work has been published by The New York Times, The Wall Street Journal, Time Magazine, Financial Times, and The Guardian.

16. Mr. Asinor's work has been published by The Washington Post.

17. On August 29, 2020, at around 7:00 p.m., Plaintiffs covered a group of demonstrators who marched through the District to protest police brutality by filming and photographing them.

18. The protesters marched through various neighborhoods in the District before arriving at the intersection of 16th Street NW and H Street NW, near what was then known as BLM Plaza.

19. Plaintiffs arrived at this intersection at around 11:00 p.m.

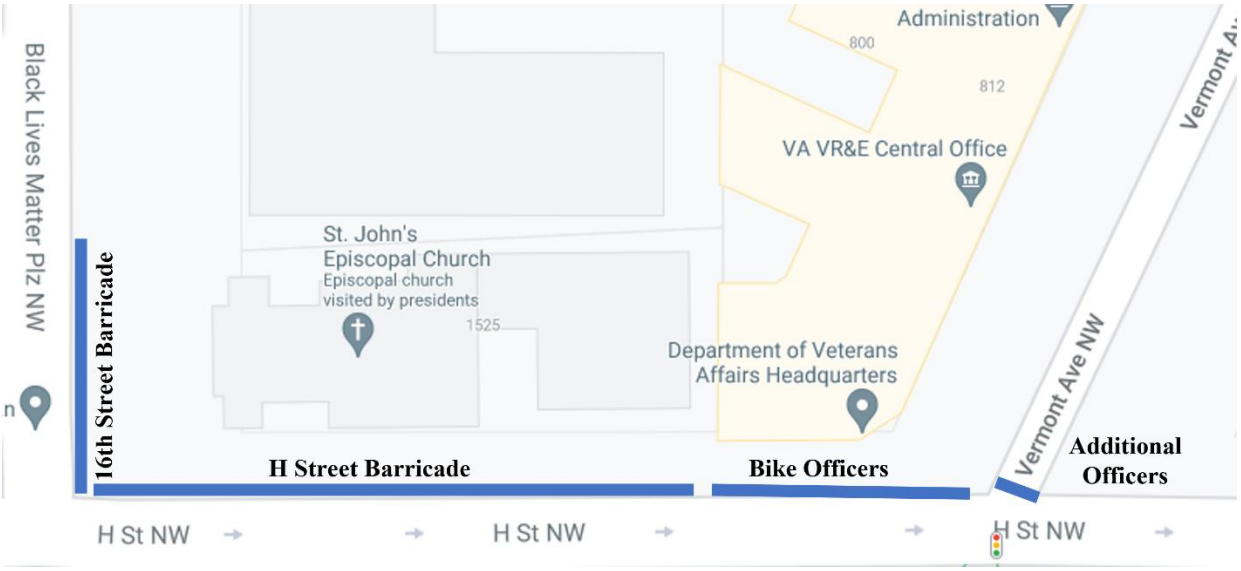
20. That night, there was a large police presence at BLM Plaza and on surrounding streets. MPD officers stood behind concrete barricades (lines of "Jersey barriers") erected in front of St. John's Episcopal Church. There were two barricades—one that stretched north on 16th Street NW

("16th Street Barricade") and one that stretched east on H Street NW ("H Street Barricade"). MPD officers were stationed in front of the church and behind these barricades.

21. Several other MPD officers with bicycles ("bike officers") stood further east on H Street, between the H Street Barricade and Vermont Avenue NW.

22. At the H Street and Vermont Avenue intersection, another line of MPD officers stood across Vermont Avenue.

23. The annotated map below shows the officers' positions at around 11:00 p.m. on August 29.



24. A large group of protesters stood near the 16th and H Street Barricades. They held signs, shouted slogans, and chanted to express their outrage with the state of policing in America.

25. Both Mr. Asinor and Mr. Dozier walked around the areas of the 16th Street Barricade and H Street Barricade to film and photograph the protest.

26. At around 11:20 p.m., several MPD officers surrounded a demonstrator at the H Street Barricade and appeared to arrest that individual. The demonstration otherwise continued.

Officers' Unlawful Use of Chemical Irritants Injures Mr. Dozier

27. As he was filming, Mr. Dozier followed a group of protesters east on H Street, toward its intersection with Vermont Avenue.

28. He paused near the line of bike officers stationed on H Street and continued to film officers and protesters.

29. Protesters stood a few feet in front of the officers, holding signs and verbally demonstrating against officers, expressing frustration with their practices.

30. Moments after Mr. Dozier arrived, he saw a protester being shoved near the bike officers stationed between the H Street Barricade and Vermont Avenue. Mr. Dozier moved closer to film what was occurring.

31. Mr. Dozier did not see any demonstrator touch the officers, throw objects at the officers, or do anything other than continue to verbally protest.

32. Nonetheless, as the protesters expressed their frustrations with MPD officers' actions that night and more generally, Unidentified MPD Officer 1 released a munition onto H Street close to where Mr. Dozier was standing. Mr. Dozier heard a hissing sound, like pressure being released, and then saw the spread of gas or smoke which contained chemical irritant (a fact that became clear when it made contact with him).

33. The smoke prompted Mr. Dozier to back farther away from the bike officers.

34. Many protesters also backed away from the bike officers.

35. As protesters were moving back, Unidentified MPD Officer 2 released another munition, causing more smoke or gas with chemical irritants to fill the air.

36. This irritant from Officer 2's munition combined with the irritant produced by Officer 1's munition to create clouds of smoke that lingered in the air.

37. Despite Mr. Dozier's attempt to retreat, the irritants made contact with him and caused him to cough.

38. Mr. Dozier ran east on H Street toward its intersection with Vermont Avenue to escape the chemical smoke. Many demonstrators started running in that direction, too.

39. As Mr. Dozier approached the intersection of H Street and Vermont Avenue, he saw officers wearing riot gear with helmets and batons ("riot officers") marching toward him from further east on H Street. The officers advanced in a line that spanned the width of H Street, heading west. As Mr. Dozier turned onto Vermont to avoid the line of officers and began running north, he saw a second line of riot officers approaching him from that direction. The second line of officers marched past Mr. Dozier down Vermont.

40. As the second line of officers passed by Mr. Dozier, Defendant Commander Robert Glover grabbed him, lifted him, and pushed him south through the line of officers, placing Mr. Dozier back in their path, apparently to contain Mr. Dozier within a perimeter that MPD was tightening. Because the Vermont line of officers was again approaching Mr. Dozier from the north, and the H Street line of officers was approaching him from the east, Defendant Glover's placement of Mr. Dozier forced him to return to H Street, back into the clouds of irritants that Mr. Dozier had tried to escape.

41. Out of options, Mr. Dozier struggled to breathe as he moved through the chemical irritants. His nose ran and his face burned as he fled west on H Street, then turned north onto 16th Street.

Officers' Unlawful Use of Chemical Irritants Injures Mr. Asinor

42. Mr. Asinor had been photographing near the H Street Barricade when he heard the sound of Unidentified MPD Officers 1 and 2 releasing munitions.

43. He moved closer to the intersection of H Street and Vermont Avenue to take photos of the scene and the smoke or gas produced.

44. Shortly thereafter, Mr. Asinor saw riot officers advancing toward him from the east on H Street, ordering people to move back and marching in a line that spanned the width of the street so people could not move east on H Street.

45. Faced with this line of riot officers, Mr. Asinor, along with several journalists and demonstrators standing near him, started moving west on H Street toward 16th Street, keeping about five feet ahead of the riot officers.

46. Many people around Mr. Asinor continued to engage in First Amendment activities. Some people held out their phones to film the officers and narrated what the officers were doing. Others raised signs with statements critical of policing.

47. Mr. Asinor himself walked backwards to continue capturing pictures of the riot officers and demonstrators near or in front of him.

48. Mr. Asinor and the demonstrators and journalists near him reached the intersection of 16th and H Streets and turned onto 16th Street. As the group turned, the distance between the riot officers and one of the demonstrators, who was close to Mr. Asinor on the inside of the turn, shortened.

49. Neither this demonstrator nor any of the other people around him touched the officers or made any threatening movements or statements.

50. But several riot officers, apparently frustrated that the demonstrator was now closer to them, grabbed the demonstrator and pushed him to the ground, raising batons as if they were going to hit him.

51. The demonstrator scrambled to get up and move away from the officers.

52. As the demonstrator moved away, Defendant Officer Shawn Caldwell, who was holding a gun-shaped weapon attached to a small tank, unleashed liquid containing chemical irritant toward the demonstrator and the people near him, hitting Mr. Asinor.

53. Mr. Asinor felt a burning sensation on his neck and experienced trouble breathing from the chemical irritant spray. He was coughing, his eyes watered, and he became disoriented.

Officers' Unlawful Use of Less-lethal Projectiles Against Plaintiffs

54. Around the time Mr. Asinor was hit with chemical irritant, at least one officer, Unidentified MPD Officer 3, began deploying a series of stun grenades nearby.

55. The stun grenades produced smoke and loud noises that terrified and further disoriented Mr. Asinor, who was still near the intersection of 16th and H Streets. They affected Mr. Dozier similarly, who was still fleeing the area and was, by this time, further north on 16th Street.

56. At the time Officer 3 deployed the stun grenades, neither Mr. Asinor nor Mr. Dozier saw any protesters make contact with officers, throw objects at them, or engage in any violent behavior.

57. Instead, Mr. Asinor and Mr. Dozier saw the protesters engaged in First Amendment activity, such as chanting slogans and waving signs.

58. Some protesters asked officers why munitions were being used when the tactic had been banned.

59. The stun grenades placed Mr. Asinor and Mr. Dozier in fear that either the officers or explosive devices deployed by the officers would imminently make contact with their bodies.

60. The riot officers continued to march, pushing protesters and Plaintiffs north on 16th Street.

61. Mr. Asinor and Mr. Dozier fled the scene and returned to their respective apartments.

Plaintiffs' Injuries

62. When Mr. Dozier arrived home on August 29, about 30 minutes after he had been attacked by MPD with chemical irritants and stun grenades, he felt intense burning in his eyes and the sting of the irritants in his nose and throat. He took a shower to wash off the irritants but could not alleviate the burning sensation on his skin. After the shower, he dry-heaved for approximately half an hour.

63. The August 29 attack caused Mr. Dozier significant and persistent psychological distress. Mr. Dozier met with a psychologist after the incident, who noted that he had several symptoms consistent with Post-Traumatic Stress Disorder. Those symptoms included heightened sensitivity to loud noises, sudden, unexpected anxiety attacks, and a fear of being cornered with no escape. For a year following the incident, he attended bi-weekly therapy sessions, which helped him deal with his PTSD symptoms. He continues to attend therapy on a weekly basis to manage the ongoing symptoms, which include sensitivity to loud noises and anxiety around police.

64. When Mr. Asinor arrived home after the August 29 attack, around 30 to 60 minutes after he had been exposed to the chemical irritants, he took a shower and used dish soap to scrub the chemical irritants from his body. He continued to cough and experience trouble breathing.

65. MPD's attacks against Mr. Asinor on August 29 caused Mr. Asinor significant psychological distress, including difficulty sleeping for weeks.

66. To this day, Mr. Asinor continues to feel jittery and anxious around loud noises, such as fireworks, because they remind him of the munitions officers used against him. He continues to avoid the downtown area formerly known as BLM Plaza and the nearby streets. The lingering trauma from the events of August 29, 2020 contributed to his decision a few months later to stop

attending and covering protests. Currently, Mr. Asinor does not cover protests and does not intend to resume.

Compliance with D.C. Code § 12-309

67. Plaintiffs have satisfied the requirements of D.C. Code § 12-309.

68. On February 25, 2021, counsel for Plaintiffs mailed to the District's Office of Risk Management notice of claim letters informing the District of the approximate time, place, cause, and circumstances of the injuries and damages that each Plaintiff suffered.

69. On February 26, 2021, counsel additionally filed similarly detailed notices of claims for each Plaintiff through the District's online portal.

70. The District confirmed receipt of the notice of claim letters on February 26, 2021 and March 1, 2021. Mr. Asinor's claims were assigned No. GL-21-000807 and No. GL-21-000792. Mr. Dozier's claim was assigned No. GL-21-000791.

CLAIMS FOR RELIEF

Claim 1: Negligence per se / First Amendment Assemblies Act – unlawful use of chemical irritants; unlawful use of less-lethal projectiles
(Plaintiffs Asinor and Dozier against Defendants District of Columbia, Glover, and Caldwell)

71. The D.C. Council enacted the First Amendment Assemblies Act, as amended by the Comprehensive Policing and Justice Reform Second Emergency Amendment Act of 2020, 67 D.C. Reg. 9148 (July 31, 2020), "as a response to . . . the past record" of MPD officers using excessive force to disperse protests in the District. D.C. Council Comm. on the Judiciary, Report on Bill No. 15-968 (Dec. 1, 2004) at 1. Relevant here, the First Amendment Assemblies Act imposes two specific duties of care on MPD and its officers toward individuals present at demonstrations: "Chemical irritants shall not be used by MPD to disperse a First Amendment assembly," 67 D.C. Reg. 9148 § 121(b) (amending D.C. Code § 5-331.16(b)(1)), and "[l]ess-lethal projectiles shall not

be used by MPD to disperse a First Amendment assembly," *id.* (amending D.C. Code § 5-331.16(c)(1)). The Act defines a First Amendment assembly as a "demonstration, rally, parade, march, picket line, or other similar gathering conducted for the purpose of persons expressing their political, social, or religious views." D.C. Code § 5-331.02(2).

72. Plaintiffs Dozier and Asinor were present at a First Amendment Assembly near BLM Plaza around 11:00 p.m. on August 29, 2020.

73. The First Amendment Assemblies Act exists to promote safety and "protect persons," like Plaintiffs, "who are exercising First Amendment rights in the District of Columbia" from excessive police force. D.C. Code § 5-331.17. As journalists exercising their First Amendment rights to cover demonstrations, Plaintiffs are among the class of individuals the statute is designed to protect. The prohibitions on the use of chemical irritants and less-lethal munitions to disperse assemblies are duties imposed on MPD officers, including Defendant Glover, Defendant Caldwell, and Unidentified MPD Officers 1–3.

74. Defendant Commander Glover is liable to Plaintiff Dozier under the doctrine of negligence per se. Defendant Glover breached his statutory duty of care by causing Plaintiff Dozier to be exposed to chemical irritants as part of MPD's effort to disperse people engaged in a First Amendment assembly on August 29, 2020. After Unidentified MPD Officers 1 and 2 deployed munitions that created clouds of chemical irritants, Defendant Glover intercepted Plaintiff Dozier as Dozier attempted to escape and intentionally placed Dozier in a position where he had no option but to run through the chemical clouds. In so doing, Defendant Glover, together with the other MPD officers, caused Plaintiff Dozier to experience pain, difficulty breathing, and emotional distress, among other harms. Concerted tortious acts such as these give rise to liability for all participants.

75. Defendant Caldwell is liable to Plaintiff Asinor under the doctrine of negligence per se because he breached his statutory duty of care by using chemical irritants to disperse people engaged in a First Amendment assembly on August 29, 2020. Defendant Caldwell's use of chemical irritant spray caused Plaintiff Asinor pain, difficulty breathing, and emotional distress, among other harms.

76. Unidentified MPD Officers 1 and 2 breached their statutory duty of care by each deploying chemical irritants as part of their effort to disperse people engaged in a First Amendment assembly on August 29, 2020. In so doing, they caused Plaintiff Dozier to be exposed to chemical irritants and experience pain, difficulty breathing, and emotional distress, among other harms.

77. Unidentified MPD Officer 3 breached his statutory duty of care by using less-lethal projectiles—specifically, stun grenades—to disperse people engaged in a First Amendment assembly on August 29, 2020. Officer 3 harmed Plaintiffs by causing them to experience terrifying and disorienting noise as well as psychological distress.

78. Defendant District of Columbia is liable under the doctrine of *respondeat superior* for the negligence of its agents, Defendant Glover, Defendant Caldwell, and Unidentified MPD Officers 1–3, who all acted within the scope of their employment as MPD officers and on behalf of and in the interests of MPD in using chemical irritants or less-lethal projectiles to disperse people engaged in a First Amendment assembly on August 29, 2020.

Claim 2: First Amendment Assemblies Act – unlawful use of chemical irritants; unlawful use of less-lethal projectiles
(Plaintiffs Asinor and Dozier against Defendants District of Columbia, Glover, and Caldwell)

79. Defendants' use of chemical irritants and less-lethal projectiles to disperse First Amendment assemblies on August 29, 2020 in violation of the First Amendment Assemblies Act violated Plaintiffs' rights directly under the Act, which implies a private cause of action.

80. The D.C. Council intended for the Act to be privately enforceable, explicitly stating that its provisions set forth "standards for police conduct" that "may be relied upon by such persons in any action alleging violations of statutory or common law rights." D.C. Code § 5-331.17.

81. Plaintiffs fall within the group for whose special benefit the statute was enacted, as the Act is "intended to protect persons," like Plaintiffs, "who are exercising First Amendment rights in the District of Columbia." *Id.*

82. The Act's purpose is consistent with a private cause of action as it provides that "the declared public policy of the District of Columbia [is] that . . . [p]ersons and groups have a right to organize and participate in peaceful First Amendment assemblies on the streets, sidewalks, and other public ways, and in the parks of the District of Columbia." D.C. Code § 5-331.03.

83. Defendant Glover is liable to Plaintiff Dozier for the August 29, 2020 violation of Plaintiff Dozier's right under the First Amendment Assemblies Act to be free from the use of chemical irritants.

84. Defendant Caldwell is liable to Plaintiff Asinor for the August 29, 2020 violation of Plaintiff Asinor's right under the First Amendment Assemblies Act to be free from the use of chemical irritants.

85. On August 29, 2020, Unidentified MPD Officers 1 and 2 violated Plaintiff Dozier's right under the First Amendment Assemblies Act to be free from the use of chemical irritants.

86. On August 29, 2020, Unidentified MPD Officer 3 violated Plaintiffs Asinor and Dozier's rights under the First Amendment Assemblies Act to be free from the use of less-lethal projectiles.

87. Defendant District of Columbia is liable under the doctrine of *respondeat superior* for the actions of its agents Defendant Glover, Defendant Caldwell, and Unidentified MPD Officers 1–3, who acted within the scope of their employment as MPD officers and on behalf of and in the

interests of MPD in using chemical irritants or less-lethal projectiles to disperse people engaged in a First Amendment assembly on August 29, 2020.

Claim 3: Assault and battery
(Plaintiffs Asinor and Dozier against Defendants District of Columbia, Glover, and Caldwell)

88. District of Columbia law proscribes assault, defined as an act that is intended to cause harmful or offensive contact or place the plaintiff in imminent apprehension of a harmful or offensive contact, and, in fact, causes the plaintiff to experience imminent apprehension of such contact.

89. District of Columbia law proscribes battery, defined as an intentional act that causes a harmful or offensive bodily contact.

90. Defendant Glover is liable to Plaintiff Dozier for committing assault and battery because, on August 29, 2020, he physically grabbed and then intentionally placed Plaintiff Dozier in a position where he had no option but to run through chemical irritants, with the intent and effect of placing him in imminent apprehension of harmful or offensive contact, and then causing such contact.

91. Defendant Caldwell is liable to Plaintiff Asinor for committing assault and battery because, on August 29, 2020, he intentionally used chemical irritants against demonstrators and journalists, including Plaintiff Asinor, with the intent and effect of placing those individuals, including Plaintiff Asinor, in imminent apprehension of harmful or offensive contact, and then causing such contact to Plaintiff Asinor.

92. Defendants Glover and Caldwell acted with intent to injure, or in willful disregard for the rights of Plaintiffs, and their conduct was outrageous or reckless toward the safety of Plaintiffs.

93. Unidentified MPD Officers 1 and 2 committed assault and battery on Plaintiff Dozier when, on August 29, 2020, they intentionally caused demonstrators and journalists, including Plaintiff Dozier, to be exposed to chemical irritants, with the intent and effect of placing those individuals, including Plaintiff Dozier, in imminent apprehension of harmful or offensive contact, and causing such contact to Plaintiff Dozier.

94. Unidentified MPD Officer 3 committed assault and battery against Plaintiffs Asinor and Dozier when, on August 29, 2020, Officer 3 intentionally used less-lethal projectiles—specifically, stun grenades—against demonstrators and journalists, including Plaintiffs, with the intent and effect of placing those individuals, including Plaintiffs, in imminent apprehension of harmful or offensive contact, and causing such contact to Plaintiffs.

95. Defendant District of Columbia is liable under the doctrine of *respondeat superior* for the damages inflicted by its agents Defendant Glover, Defendant Caldwell, and Unidentified MPD Officers 1–3, who were acting within the scope of their employment as MPD officers and on behalf of and in the interests of MPD.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs request that this Court:

(a) ENTER JUDGMENT declaring that the actions of all Defendants violated D.C. law;

(b) ENTER JUDGMENT awarding Plaintiffs compensatory damages against all Defendants in an amount appropriate to the evidence adduced at trial;

(c) ENTER JUDGMENT awarding Plaintiffs punitive damages against all individual Defendants in an amount appropriate to the evidence adduced at trial;

(d) ENTER JUDGMENT awarding Plaintiffs their costs and fees on any ground that would make fees available; and

(e) GRANT Plaintiffs such further relief as this Court may deem just and proper.

JURY DEMAND

Plaintiffs request a trial by jury.

Respectfully submitted,

/s/ Laura K. Follansbee
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November 19, 2026

Counsel for Plaintiffs**

* Ms. Pelosi is not admitted to practice law in any jurisdiction. She is practicing under the supervision of Members of the D.C. Bar at the American Civil Liberties Union Foundation of the District of Columbia pursuant to D.C. App. Rule 49(c)(9)(B).

** Counsel wish to acknowledge the assistance of paralegal Ameerah Adetoro, as well as former paralegal Elaine Stamp, in the preparation of this filing.