

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division

ELIZABETH SINES, SETH WISPELWEY,  
MARISSA BLAIR, TYLER MAGILL, APRIL  
MUNIZ, HANNAH PEARCE, MARCUS  
MARTIN, JOHN DOE, JANE DOE 1, JANE  
DOE 2, AND JANE DOE 3,

Plaintiffs,

v.

Civil Action No.: 3:17CV00072

JASON KESSLER, RICHARD SPENCER,  
CHRISTOPHER CANTWELL, JAMES ALEX  
FIELDS, JR., VANGUARD AMERICA,  
ANDREW ANGLIN, MOONBASE  
HOLDINGS, LLC, ROBERT "AZZMADOR"  
RAY, NATHAN DAMIGO, ELLIOTT  
KLINE a/k/a ELI MOSELEY, IDENTITY  
EVROPA, MATTHEW HEIMBACH, MATTHEW  
PARROTT a/k/a DAVID MATTHEW PARROTT,  
TRADITIONALIST WORKER PARTY,  
MICHAEL HILL, MICHAEL TUBBS, LEAGUE  
OF THE SOUTH, JEFF SCHOEP, NATIONAL  
SOCIALIST MOVEMENT, NATIONALIST  
FRONT, AUGUSTUS SOL INVICTUS,  
FRATERNAL ORDER OF THE ALT-KNIGHTS,  
MICHAEL "ENOC" PEINOVICH, LOYAL  
WHITE KNIGHTS OF THE KU KLUX KLAN,  
and EAST COAST KNIGHTS OF THE KU KLUX  
KLAN a/k/a EAST COAST KNIGHTS OF THE  
TRUE INVISIBLE EMPIRE,

Defendants.

ANSWER

COMES NOW the Defendant, James Alex Fields, Jr., ("Fields"), by counsel, as and for his Answer to the Complaint filed against him herein, and in support thereof states as follows:

1. In response to Paragraph 1 of the Complaint, Fields admits only that he traveled to Charlottesville, Virginia to attend the Unite the Right rally. Otherwise denied as to Fields. He does not have sufficient information to respond to allegations as to the intent of others.

2. In response to Paragraph 2, Fields does not have sufficient information to admit or deny these allegations.

3. Fields denies the allegations in Paragraph 3 as to him. He does not have sufficient information to respond to allegations as to the intent of others.

4. Fields denies the allegations in Paragraph 4 as to him. He does not have sufficient information to respond to allegations as to the intent of others.

5. Fields denies the allegations in Paragraph 5 as to him. He does not have sufficient information to respond to allegations as to the intent of others.

6. Fields denies the allegations in Paragraph 6 as to him. He does not have sufficient information to respond to allegations as to the intent of others.

7. Paragraph 7 contains no allegations as to Fields and should require no response. To the extent a further response is deemed required, denied.

#### **JURISDICTION AND VENUE**

8. While denying the allegations in the Complaint generally, Fields admits jurisdiction is proper.

9. While denying the allegations in the Complaint generally, Fields admits venue is proper.

### **THE PARTIES**

#### **A. Plaintiffs**

10. Fields does not have sufficient information to admit or deny the allegations of Paragraphs 10.

11. Fields denies the allegations in Paragraph 11 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others or to the statements about this Plaintiff's background and/or alleged injuries and symptoms.

12. Fields denies the allegations in Paragraph 12 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others, the statements about this Plaintiff's actions and background, or the alleged injuries, limitations, and symptoms.

13. Fields denies the allegations in Paragraph 13 as to him. He does not have sufficient information to respond to allegations as to the intent or actions of others or this Plaintiff's actions and alleged injuries or damages.

14. Fields denies the allegations in Paragraph 14 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others or to this Plaintiff's claims regarding her actions and alleged injuries.

15. While admitting the vehicle he was operating collided with the rear of another vehicle, Fields otherwise denies the allegations in Paragraph 15 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others or Plaintiff's alleged injuries and damages.

16. While admitting the vehicle he was operating collided with the rear of another vehicle, Fields otherwise denies the allegations in Paragraph 16 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others or Plaintiff's alleged injuries and damages.

17. While admitting the vehicle he was operating collided with the rear of another vehicle, Fields otherwise denies the allegations in Paragraph 17 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others or Plaintiff's alleged injuries and damages.

18. While admitting the vehicle he was operating collided with the rear of another vehicle, Fields otherwise denies the allegations in Paragraph 18 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others or Plaintiff's alleged injuries and damages.

19. While admitting the vehicle he was operating collided with the rear of another vehicle, Fields otherwise denies the allegations in Paragraph 19 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others or Plaintiff's alleged injuries and damages.

20. While admitting the vehicle he was operating collided with the rear of another vehicle, Fields otherwise denies the allegations in Paragraph 20 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others or Plaintiff's alleged injuries and damages.

**B. Defendants**

21. Paragraph 21 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

22. Paragraph 22 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

23. Paragraph 23 is not addressed to Fields and should require no response. To the extent a further response is deemed required, denied.

24. In response to Paragraph 24, Fields admits he is a resident of Ohio and that the front of his Dodge Challenger collided with the rear of another vehicle. He further admits he has been charged with the crimes related to the collision. Otherwise denied.

25. In response to Paragraph 25, Fields denies any allegations that might be interpreted as to him. He admits that he carried a shield given to him by a stranger at the Unite the Right event on August 12. Otherwise denied. Fields does not have sufficient information to respond to allegations as to the intent or acts of others.

26. Paragraph 26 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

27. Paragraph 27 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

28. Paragraph 28 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

29. Paragraph 29 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

30. Paragraph 30 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

31. Paragraph 31 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

32. Paragraph 32 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

33. Paragraph 33 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

34. Paragraph 34 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

35. Paragraph 35 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

36. Paragraph 36 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

37. Paragraph 37 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

38. Paragraph 38 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

39. Paragraph 39 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

40. Paragraph 40 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

41. Paragraph 41 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

42. Paragraph 42 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

43. Paragraph 43 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

44. Paragraph 44 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

45. Paragraph 45 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

#### **FACTS**

46. Fields denies the allegations in Paragraph 46 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.



47. Fields denies the allegations in Paragraph 47 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

48. Fields denies the allegations in Paragraph 48 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

49. Fields denies the allegations in Paragraph 49 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

50. Fields denies the allegations in Paragraph 50 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

51. Fields denies the allegations in Paragraph 51 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

52. Fields denies the allegations in Paragraph 52 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

53. Paragraph 53 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

54. Fields denies the allegations in Paragraph 54 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

55. Fields denies the allegations in Paragraph 55 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

56. Fields denies the allegations in Paragraph 56 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

57. Fields denies the allegations in Paragraph 57 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

58. Paragraph 58 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

59. Paragraph 59 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

60. Fields denies the allegations in Paragraph 60 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

61. Fields denies the allegations in Paragraph 61 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

62. Paragraph 62 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

63. Fields denies the allegations in Paragraph 63 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

64. Paragraph 64 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

65. Fields denies the allegations in Paragraph 65 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

66. Fields denies the allegations in Paragraph 66 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

67. Fields denies the allegations in Paragraph 67 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

68. Fields denies the allegations in Paragraph 68 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

69. Fields denies the allegations in Paragraph 69 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

70. Fields denies the allegations in Paragraph 70 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

71. Fields denies the allegations in Paragraph 71 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

72. Fields denies the allegations in Paragraph 72 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

73. Fields does not have sufficient information to admit or deny the allegations of Paragraph 73.

74. Fields does not have sufficient information to admit or deny the allegations of Paragraph 74.

75. Fields does not have sufficient information to admit or deny the allegations of Paragraph 75.

76. Fields does not have sufficient information to admit or deny the allegations of Paragraph 76.

77. Fields does not have sufficient information to admit or deny the allegations of Paragraph 77.

78. Fields denies the allegations in Paragraph 78 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others

79. Fields does not have sufficient information to admit or deny the allegations of Paragraph 79.

80. In response to Paragraph 80, Fields admits that upon information and believe, a "Charlottesville Statement" was published by Spencer that contains the quoted language. Fields does not have sufficient information to respond the remaining allegations of Paragraph 80.

81. Paragraph 81 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

82. Paragraph 82 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

83. Paragraph 83 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

84. Paragraph 84 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

85. Paragraph 85 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

86. Paragraph 86 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields admits upon information and belief that such a poster was made public.

87. Paragraph 87 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

88. Paragraph 88 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

89. Paragraph 89 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

90. Paragraph 90 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

91. Fields denies the allegations in Paragraph 91 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

92. Fields denies the allegations in Paragraph 92 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

93. Fields denies the allegations in Paragraph 93 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

94. Paragraph 94 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

95. Paragraph 95 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

96. Fields denies the allegations in Paragraph 96 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

97. Fields denies the allegations in Paragraph 97 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

98. Paragraph 98 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

99. Fields denies the allegations in Paragraph 99 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

100. Paragraph 100 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

101. Fields denies the allegations in Paragraph 101 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

102. Paragraph 102 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

103. Fields denies the allegations in Paragraph 103 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

104. Paragraph 104 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

105. Paragraph 105 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

106. Paragraph 106 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

107. Paragraph 107 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

108. Fields denies the allegations in Paragraph 108 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

109. Fields denies the allegations in Paragraph 109 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

110. Paragraph 110 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations

111. Fields denies the allegations in Paragraph 111 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

112. Fields denies the allegations in Paragraph 112 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

113. Paragraph 113 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to determine what was the "official" poster for the event. However, Fields



admits the photograph below Paragraph 113 does appear to have confederate flags and monuments, etc.

114. Fields denies the allegations in Paragraph 114 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

115. Fields denies the allegations in Paragraph 115 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

116. Paragraph 116 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

117. Paragraph 117 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

118. Paragraph 118 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

119. Paragraph 119 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

120. In response to Paragraph 120, Fields admits only that he met with other attendees once in Charlottesville to walk to the event. Fields does not have sufficient information to respond to allegations regarding the actions and intents of others.

121. Paragraph 121 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations

122. Paragraph 122 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations as to the actions and intents of others.

123. Paragraph 123 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations as to the actions and intents of others.

124. Paragraph 124 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations as to the actions and intents of others.

125. Paragraph 125 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations as to the actions and intents of others.

126. Paragraph 126 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

127. Paragraph 127 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

128. Paragraph 128 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

129. Paragraph 129 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

130. Fields denies the allegations in Paragraph 130 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

131. Paragraph 131 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

132. Fields denies the allegations in Paragraph 132 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

133. Fields denies the allegations in Paragraph 133 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

134. Fields denies the allegations in Paragraph 134 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

135. Fields denies the allegations in Paragraph 135 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

136. Paragraph 136 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

137. Fields denies the allegations in Paragraph 137 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

138. Paragraph 138 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

139. Fields denies the allegations in Paragraph 139 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

140. Fields denies the allegations in Paragraph 140 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

141. Paragraph 141 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

142. Paragraph 142 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

143. Fields denies Paragraph 143 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

144. Paragraph 144 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

145. Paragraph 145 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

146. Fields denies Paragraph 146 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

147. Fields denies Paragraph 147 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

148. Fields denies Paragraph 148 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

149. Paragraph 149 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

150. Fields denies Paragraph 150 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

151. Fields denies Paragraph 151 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

152. Paragraph 152 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

153. Fields denies Paragraph 153 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

154. Fields denies Paragraph 154 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

155. Fields denies Paragraph 155 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

156. Fields denies Paragraph 156 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

157. Paragraph 157 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

158. Fields denies Paragraph 158 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

159. Fields denies Paragraph 159 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others nor to the mental state of Plaintiff John Doe.

160. Fields denies Paragraph 160 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others nor to the mental state of Plaintiffs.

161. Paragraph 161 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

162. Fields denies Paragraph 162 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others nor to the mental state of Plaintiffs.

163. Paragraph 163 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

164. Paragraph 164 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

165. Fields denies Paragraph 165 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others nor to the mental state of Plaintiffs.

166. Paragraph 166 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

167. Fields denies Paragraph 167 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others nor to the mental state or observation of Plaintiff.

168. Paragraph 168 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

169. Paragraph 169 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

170. Paragraph 170 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

171. Paragraph 171 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

172. Fields denies Paragraph 172 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

173. Fields denies Paragraph 173 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.



174. Paragraph 174 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

175. Paragraph 175 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

176. Paragraph 176 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

177. Paragraph 177 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

178. In response to Paragraph 178, Fields denies he knew any intimidating, threatening or otherwise illegal conduct was being planned or coordinated.

179. Fields denies Paragraph 179 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others and did not have any knowledge of any plan formulated by Chief Thomas or others.

180. Fields denies Paragraph 180 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

181. Paragraph 181 not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

182. In response to Paragraph 182, Fields admits he walked to the Park with other individuals. Someone he did not know handed him a shield. Otherwise denied.

183. Paragraph 183 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

184. Paragraph 184 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

185. Paragraph 185 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

186. Fields denies Paragraph 186 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

187. Fields denies Paragraph 187 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

188. Fields denies Paragraph 188 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

189. Paragraph 189 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

190. Paragraph 190 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

191. Fields denies Paragraph 191 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

192. Fields denies Paragraph 192 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

193. Fields denies Paragraph 193 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

194. Fields denies Paragraph 194 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

195. Paragraph 195 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

196. Fields denies Paragraph 196 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

197. Fields denies Paragraph 197 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

198. Fields denies Paragraph 198 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

199. Fields denies Paragraph 199 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

200. Paragraph 200 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

201. Paragraph 201 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

202. Fields denies Paragraph 202 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

203. Fields denies Paragraph 203 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

204. Upon information and belief, Fields admits the allegations of Paragraph 204. At the time, he was not aware of this declaration.

205. Upon information and belief and in response to Paragraph 205, Fields admits that Governor McAuliffe declared a state of emergency. At the time, he was not aware of this declaration. Fields does not have sufficient information to admit or deny the quote attributed to Governor McAuliffe in this paragraph.

206. Paragraph 206 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

207. Fields denies Paragraph 207 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

208. Paragraph 208 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

209. Paragraph 209 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

210. Paragraph 210 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

211. Paragraph 211 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

212. Fields denies Paragraph 212 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

213. Paragraph 213 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations

214. In response to Paragraph 214, Fields denies he planned violent actions or knew violent actions were being planned.

215. Fields denies Paragraph 215 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

216. Fields denies Paragraph 216 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

217. Fields denies Paragraph 217 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

218. Fields denies Paragraph 218 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others or what is a “popular anti-Black lives Matter and anti-racial justice protest catchphrase.” The remaining allegations are not addressed to Fields and should require no response.

219. Fields denies Paragraph 219 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

220. Fields denies Paragraph 220 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

221. Fields denies Paragraph 221 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

222. Fields denies Paragraph 222 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

223. Fields denies Paragraph 223 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

224. Fields denies Paragraph 224.

225. Fields denies Paragraph 225 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

226. Paragraph 226 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

227. Paragraph 227 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

228. Paragraph 228 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

229. Paragraph 229 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

230. Paragraph 230 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

231. Fields does not have sufficient information to respond to the allegations in Paragraph 231.

232. Paragraph 232 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

233. Paragraph 233 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

234. Paragraph 234 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

235. Paragraph 235 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

236. Paragraph 236 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.



237. Paragraph 237 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

238. Paragraph 238 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

239. Paragraph 239 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

240. Paragraph 240 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

241. Paragraph 241 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

242. Fields denies the allegations in Paragraph 242 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

243. Paragraph 243 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

244. Paragraph 244 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

245. Paragraph 245 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

246. Paragraph 246 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

247. Paragraph 247 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

248. Paragraph 248 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

249. Paragraph 249 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

250. Paragraph 250 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

251. Paragraph 251 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

252. Paragraph 252 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

253. Paragraph 253 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

254. Paragraph 254 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

255. Fields denies Paragraph 255 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

256. Fields denies Paragraph 256 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

257. In responding to Paragraph 257, Fields admits upon information and belief only that Congress passed a joint resolution as alleged.

258. In responding to Paragraph 258, Fields admits upon information and belief only that this paragraph accurately describes additional language in the joint resolution.

259. Fields admits Paragraph 259 upon information and belief.

260. Fields does not have sufficient information to admit or deny the allegations in Paragraph 260.

261. Fields does not have sufficient information to admit or deny the allegations in Paragraph 261.

262. Fields does not have sufficient information to admit or deny the allegations in Paragraph 262.

263. Fields denies he committed a "car attack." Fields does not have sufficient information to admit or deny the remaining allegations in Paragraph 263.

264. Fields denies he committed an "attack." Fields does not have sufficient information to admit or deny the remaining allegations in Paragraph 264.

265. Fields does not have sufficient information to admit or deny the allegations in Paragraph 265.

266. In response to Paragraph 266, Fields denies he committed a "terrorist attack." Fields does not have sufficient information to admit or deny the remaining allegations in Paragraph 266.

267. Fields denies he committed a "car attack." Fields does not have sufficient information to admit or deny the remaining allegations in Paragraph 267.

268. Fields does not have sufficient information to admit or deny the remaining allegations in Paragraph 268.

269. Fields denies he committed a "car attack." Fields does not have sufficient information to admit or deny the remaining allegations in Paragraph 269.

270. Fields denies Paragraph 270 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others or the alleged emotional injuries.

271. Fields denies he committed a "car attack." Fields does not have sufficient information to admit or deny the remaining allegations in Paragraph 271.

272. Paragraph 272 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

273. Fields denies Paragraph 273 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

274. Paragraph 274 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

275. Paragraph 275 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

276. Paragraph 276 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

277. Paragraph 277 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

278. Paragraph 278 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

279. Paragraph 279 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

280. Fields denies Paragraph 280 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

281. Paragraph 281 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

282. Fields denies Paragraph 282 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

283. Paragraph 283 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

284. Fields denies Paragraph 284 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

285. Paragraph 285 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

286. Paragraph 286 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations as to others but denies them as to him.

287. Paragraph 287 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations

288. Paragraph 288 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

289. Paragraph 289 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

290. Paragraph 290 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

291. Paragraph 291 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

292. Paragraph 292 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

293. Paragraph 293 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

294. Paragraph 294 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

295. Paragraph 295 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

296. Paragraph 296 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

297. Paragraph 297 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

298. Paragraph 298 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.



299. Paragraph 299 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

300. Paragraph 300 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

301. Paragraph 301 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

302. Paragraph 302 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

303. Fields denies Paragraph 303 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

304. In response to Paragraph 304, Fields admits only that he attended the event in Charlottesville; was wearing a white polo shirt (that did not have the Vanguard logo on it) and khakis; and was carrying an object with the Vanguard logo for some portions of the event. Otherwise denied.

305. Paragraph 305 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

306. Fields denies Paragraph 306 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

307. Fields denies Paragraph 307.

308. In response to Paragraph 308, Fields incorporates the responses in all preceding paragraphs.

309. Fields denies Paragraph 309 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

310. Fields denies Paragraph 310 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

311. Fields denies Paragraph 311 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others

312. Paragraph 312 is not addressed to Fields and should require no response. To the extent a further response is deemed required, Fields does not have sufficient information to respond to these allegations.

313. Fields denies Paragraph 313 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

314. Fields denies Paragraph 314 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others or alleged injuries or damages claimed by Plaintiffs.

315. Fields denies Paragraph 315 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others or alleged injuries or damages claimed by Plaintiffs.

316. In response to Paragraph 316, Fields incorporates the responses in all preceding paragraphs.

317. Fields denies Paragraph 317 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

318. Fields denies Paragraph 318 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

319. In response to Paragraph 319, Fields was not aware of any conspiracy or overt acts alleged to have been committed in furtherance of the conspiracy. Further, Fields does not have sufficient information to respond to the allegations of injuries claimed by Plaintiffs.

320. Fields denies Paragraph 320 as to him. He does not have sufficient information to respond to the allegations as to the intent or acts of others.

321. Fields denies Paragraph 321 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others or the alleged injuries claimed by Plaintiffs.

322. In response to Paragraph 322, Fields incorporates the responses in all preceding paragraphs.

323. Fields denies Paragraph 323 including all subparts as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others.

324. Fields denies Paragraph 324 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others or the alleged damages claimed by Plaintiffs and demands strict proof thereof.

325. Fields denies Paragraph 325 as to him and denies he is liable and denies he acted in pursuit of a common conspiratorial scheme.

326. In response to Paragraph 326, Fields incorporates the responses in all preceding paragraphs.

327. Fields admits Paragraph 327 is a generally correct summation of the cited Virginia code section.

328. Fields admits Paragraph 328 is a partially correct summation of the definition of "act of terrorism" in the cited Virginia code section.

329. Fields does not have sufficient information to respond to the allegations of Paragraph 329.

330. Fields denies Paragraph 330.

331. Fields does not have sufficient information to respond to the allegations of Paragraph 331.

332. Fields does not have sufficient information to respond to the allegations of Paragraph 332 including either the legislative intent or the Plaintiff's alleged injuries.

333. Fields denies Paragraph 333 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others or the alleged damages and causation therefore claimed by Plaintiffs.

334. In response to Paragraph 334, Fields incorporates the responses in all preceding paragraphs.

335. Fields admits Paragraph 335 is an accurate summation of the cited Virginia code section.

336. Fields denies Paragraph 336 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others or the alleged injuries claimed by Plaintiffs.

337. Fields denies Paragraph 337 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others or the alleged injuries claimed by Plaintiffs.

338. In response to Paragraph 338, Fields incorporates the responses in all preceding paragraphs.

339. Fields denies Paragraph 339 as to him. He does not have sufficient information to respond to allegations as to the intent or acts of others or the alleged injuries claimed by Plaintiffs.

340. In response to Paragraph 340, Fields incorporates the responses in all preceding paragraphs.

341. Fields denies Paragraph 341.

342. Fields denies Paragraph 342.

343. Fields denies Paragraph 343.

344. Fields denies Paragraph 344.

345. Fields denies Paragraph 345.

346. Fields denies Paragraph 346.

347. Fields denies Paragraph 347.

348. To the extent a response is deemed necessary, Fields denies all allegations not specifically admitted including those encompassed in any headings and/or footnotes.

349. Fields denies that any sum is owed Plaintiffs by him or that Plaintiffs have been injured in the manner or to the extent alleged.

350. Fields respectfully demands a **TRIAL BY JURY**.

Respectfully submitted,

JAMES ALEX FIELDS, JR.  
By Counsel

\_\_\_\_\_/s/ David L. Campbell  
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*Counsel for Defendant James A. Fields, Jr.*

CERTIFICATE OF SERVICE

I hereby certify that on 9<sup>TH</sup> day of November, 2017, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

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