

The Death of Peaceful Protestor ROSANNE BOYLAND on January 6th and the Biden Administration's Cover-Up

Evidence Shows J6 Law Enforcement Officers Were Responsible For Boyland's Death



January 6th, 2021 - Rosanne Boyland lay dead or unconscious on U.S. Capitol stairs after being gassed and brutally beaten by D.C. Metro and Capitol Police. Here, Trump supporters try to resuscitate her before she dies. Many of the men in this photo were charged and indefinitely detained as J6 Political Prisoners.

See the online report at Justice4Rosanne.com

Prepared By:

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WARNING: CONFIDENTIAL & PROPRIETARY INFORMATION

Monday, December 15, 2025

TABLE OF CONTENTS

TABLE OF CONTENTS.....	1
FORWARD by Cara Castronuova.....	3
Letter Plea from Rosanne Boyland's Parents.....	5
Letter Plea from Lonna Cave - Rosanne Boyland's Sister.....	7
Rosanne Marie Boyland Bio.....	8
MPD Officer Lila Morris Profile.....	9
Other Targeted Investigation Subjects.....	10
SECTION I: EXECUTIVE SUMMARY.....	11
INTRODUCTION AND ALLEGATION.....	11
TIMELINE OF EVENTS (Summary).....	12
STATEMENT OF FACTS.....	13
Crowd Compression and Denial of Medical Aid.....	13
Beating by Officer Lila Morris.....	13
Recovery and Pronouncement of Death.....	13
Official Cause-of-Death Announcement.....	13
Withholding Complete Autopsy Report from Family.....	14
Use of Force and Crowd Control Expert Witness.....	14
Evidentiary Suppression and Emerging Record.....	14
LEGAL BASIS AND REQUESTED ACTIONS.....	15
Potential Statutory Authorities Violated.....	15
Requested Actions.....	15
CONCLUSION.....	16
CERTIFICATION.....	16
SECTION II: STORYBOARD.....	17
SECTION III: WITNESSES.....	22
Witness List.....	22
Justin Winchell, Eyewitness & Best Friend to Rosanne Boyland.....	23
Stanley Kephart, use of force and Crowd Control Expert.....	25
Steven Kay Hill, use of force Expert Witness.....	30
Philip Anderson, Eyewitness Affidavit.....	33
Ronald McAbee, Eyewitness Affidavit.....	35
Michael Foy, Eyewitness Affidavit.....	37



Luke Coffee, Eyewitness Affidavit.....	39
Thomas Tatum, Eyewitness Affidavit.....	41
SECTION IV: TIMELINE.....	42
Unlawful Pepperball Launcher Rapid-Fire into Tunnel.....	42
Unlawful Use of Batons & Shield to Create Stampede.....	42
OC spray Unlawfully Deployed in Direct Violation of use of force Guidelines.....	43
Lila Morris Assault on Rosanne Boyland.....	46
Tunnel Viewpoint as Shown by MPD Officers BWC.....	46
Protestor Viewpoint - Video Captured by J. Robertson of NYC.....	51
SECTION V: AUTOPSY.....	70
WASHINGTON D.C. ODMC REPORTS & MEDICAL RECORDS.....	70
Autopsy Report.....	70
Toxicology Report.....	70
Supplemental Report.....	70
Combined D.C. Metro Reports (Redacted).....	70
G.W. University Hospital Medical Records.....	70
DC OCME - GOV AUTOPSY SUMMARY.....	71
OPINIONS FROM INDUSTRY EXPERTS.....	72
Barbara C. Wolf, MD - 2nd Opinion Paid By Family.....	72
Dr. Robert A. Middleberg - 3rd Opinion.....	75
Dr. Adele Lewis - CME, TN - 4th Opinion.....	77



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YouTube Video Playlist



FORWARD by Cara Castronuova

FORWARD: Statement in Support of Criminal Referral Concerning the Death of Rosanne Boyland

I, Cara Castronuova, being duly sworn, hereby declare under penalty of perjury that the following statements are true and correct to the best of my knowledge, information, and belief:



1. I am an investigative journalist and a co-founder of CAPP (Citizens Against Political Persecution). I was present in Washington, D.C. on January 6, 2021, where I participated as a peaceful protester and independently documented events as they unfolded. My journalistic presence that day, and my firsthand observations, form part of the foundation for my subsequent investigative work.
2. In the months following January 6, I became deeply concerned by the treatment and prosecution of individuals arrested in connection with the events of that day. As early as the spring of 2021, I began focusing my reporting on what became known as the January 6 political prisoners. By the summer of 2021, I was actively interviewing detainees held in federal custody—many of whom were confined in solitary confinement, denied meaningful access to counsel, and isolated from one another. This was at a time when their stories were largely ignored by mainstream media, ignored by Republican leadership, and actively mischaracterized by Democratic officials.
3. In the course of interviewing January 6 detainees, I observed a striking and consistent pattern in their testimony. Multiple detainees, interviewed independently and without contact with one another, reported that their alleged “violent” reactions at the West Tunnel entrance of the U.S. Capitol were precipitated by witnessing **what they believed to be the beating and killing of a woman by law enforcement**, as well as observing excessive force used against women and elderly individuals. They described reacting in defense of third parties—a legally recognized defense—after witnessing tear gas deployment, pepper spraying, and violent physical assaults on civilians.
4. These accounts were notable not only for their consistency but for their improbability under the prevailing public narrative. Many of these men identified as military veterans, strong supporters of law enforcement, and individuals for whom violence toward police was entirely out of character. **Their testimony raised serious questions for me as a journalist, as it did not comport with the simplified and widely disseminated portrayal of events presented by mainstream media.**
5. I did not fully comprehend the significance of these repeated accounts until I personally located video footage of the described incident alongside another investigative journalist, Gary McBride. This footage had aired during a broadcast of a leaked Department of Justice video on MSNBC’s *Morning Joe*. Although presented as a general crowd shot intended to depict violent Trump supporters, the footage clearly shows the unconscious body of peaceful protester Rosanne Boyland being brutally struck with a stick by U.S. Capitol Police Officer Lila Morris.



6. Upon viewing this footage, I realized that the detainees' independently provided accounts were accurate. The incident they had each described was real, documented, and visible on video. I subsequently contacted Ms. Boyland's family in Georgia and ensured that they were shown this footage in person. They had previously been informed that Ms. Boyland died of a drug overdose—an explanation that never aligned with the known facts, the circumstances of her death, or her personal history.
7. Through conversations with Ms. Boyland's family and friends, I was consistently told that she was sober, not using drugs, and had attended the event as a peaceful protester who became trapped in a crowd after police began gassing protesters at close range. The police shoved the protesters into a dangerous police-created pileup of bodies (seven plus people high) with no place to go. **Therefore, the overdose narrative made no sense to me, and was implausible and deeply distressing to those who knew Ms. Boyland.**
8. I thereafter undertook extensive review and collection of additional video evidence documenting the events surrounding Ms. Boyland's death. **This evidence, taken together, demonstrates that police use of force on January 6, 2021, was the cause of her death, notwithstanding official statements to the contrary.**
9. My efforts to report these findings resulted in severe professional retaliation. In 2021, shortly after publishing my reporting on Officer Lila Morris and Ms. Boyland's death, I was permanently banned from Facebook, lost my primary media platforms, suffered significant financial harm, and I believe I was subjected to federal scrutiny. I firmly believe these actions were taken in response to my reporting.
10. Nearly five years later, no justice has been rendered for Rosanne Boyland. The public record continues to falsely state that she died of a drug overdose. Absent immediate accountability—and with the potential loss of congressional subpoena power after 2026—**there may never again be an opportunity to correct the historical record.**
11. I believe the concealment of the true circumstances of Rosanne Boyland's death constitutes one of the most consequential cover-ups related to January 6, and one of the most serious failures of accountability in modern American history. If the American public were made aware that a peaceful protester died on the Capitol grounds as a result of police brutality—and that this fact was suppressed by the Biden Administration—the historical understanding of January 6 would be fundamentally altered.
12. This affidavit is submitted to preserve the truth, to seek accountability, and to honor the life and legacy of Rosanne Boyland as she was: a peaceful American citizen and patriot, not a drug addict, whose death deserves transparency, justice, and historical accuracy.

I declare under penalty of perjury that the foregoing is true and correct.

Cara Castronova

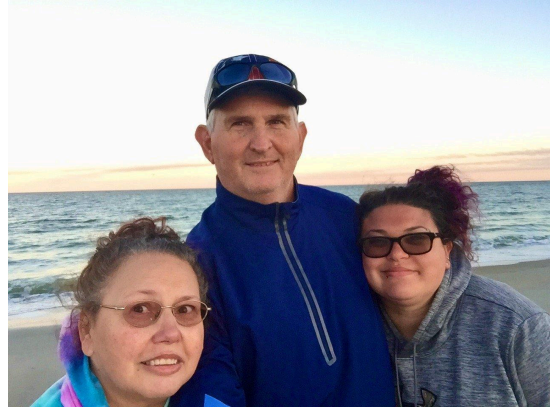
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Letter Plea from Rosanne Boyland's Parents

Dear President Donald J. Trump,

We, the parents of Rosanne Boyland, request an investigation into the circumstances and cause surrounding her death. We are only a few weeks away from the 5th anniversary of losing our daughter at the U.S. Capitol on January 6, 2021. To date, we have heard nothing from anyone in Washington showing interest in determining what really happened or correcting the cause of death. We remain hopeful that someone will actually investigate her death. We are genuinely amazed that an investigation was not automatic, given that she died at the U.S. Capitol. How many citizens have died there in recent history? We cannot think of many. There are several concerns prompting our request for an investigation:



1. Cause of Death: The D.C. Office of the Chief Medical Examiner (OCME) determined the cause of death as “accidental amphetamine intoxication” or overdose. The Medical Examiner’s office pursued this cause the night Rosanne died based on her past drug history. The autopsy toxicology report only showed Adderall in her system, which she had been prescribed for ten years prior to January 6, 2021. The OCME made no effort to investigate the scene or gather eyewitness accounts of the events leading to Rosanne’s collapse. Other medical examiners, pathologists, and toxicologists who reviewed Rosanne’s death and investigated the scene concluded that the cause of death was asphyxia, not a drug overdose.
2. False Statements by Capitol Police: According to D.C. Metro Police reports and discussions with Detective Jonathan Shell, Capitol Police misled D.C. Metro Police, stating that Rosanne simply collapsed inside the Rotunda. Evidence of these statements is found in D.C. Metro reports on Rosanne, as well as reports provided by George Washington University Hospital, where Rosanne was transported and pronounced dead.
3. Investigation and Evidence: D.C. Metro Police claimed to have investigated Rosanne’s death, but after nine months to a year, additional evidence began to surface. Several videos clearly show where Rosanne collapsed and, most disturbingly, show a D.C. Metro officer, later identified as Lila Morris, striking Rosanne with a wood walking stick while she was down and unconscious. This may explain why D.C. Metro pursued the drug overdose cause of death. D.C. Metro did not deny the beating; they concluded, in a police brutality case filed by journalist Gary McBride, that Lila Morris’s actions were objectively reasonable.



4. Cover-Up of Evidence: It appears multiple parties participated in obscuring details of her death. EMS personnel, doctors, and nurses at GWUH, as well as the D.C. OCME autopsy report made no mention of trauma or bruising, despite videos and photos showing visible bruising prior to transport. Dr. Taylor, who performed the autopsy, noted only a small abrasion on one forearm. In the first months following January 6, 2021, we did not initially question the official reports but consistently disagreed with the drug-related cause of death. Beginning in September 2021, we began seeing evidence showing what happened to Rosanne and her exact location during the incident. When we inquired with D.C. Metro and the OCME, they denied us the full autopsy report, even after we filed our own FOIA request. We had to retain legal counsel and file multiple FOIA requests to obtain any documentation. The materials we received were heavily redacted, and some requests were never responded to, even after appeals.

There remain many unanswered questions, and we fear we may never have true closure regarding the loss of our daughter. We hope that someone in Washington will take interest in understanding exactly what happened to Rosanne.

Thank you,

Bret & Cheryl Boyland
December 14, 2025



Rosanne and her parents on a family vacation



Rosanne and her nieces



Rosanne and her sister Lonna with her baby niece



Rosanne and her niece



Rosanne and her two sisters



Letter Plea from Lonna Cave - Rosanne Boyland's Sister

December 15, 2025

ATTN: President Donald J. Trump and Administration

Dear President Donald J. Trump,

We are coming up on 5 years since my sister died on the steps of the Capitol building on January 6, 2021.

For years my family has struggled with trying to find out what really happened to her that day. I was forced to do my own investigation into her death & it caused me trauma that I will live with forever.

I understand why the Biden administration didn't care to do an investigation. However, since Rosanne was a Trump supporter, I am absolutely appalled that no one under the current administration has cared to open an investigation. I would think a female getting killed on the steps of the U.S. Capitol building would be a pretty big deal!!

Can you imagine what it must be like to have NO ONE care about your sister/daughter's death?? I just want to be able to show my girls that the aunt that they loved so much wasn't a bad person, like people have said. Rosanne was the sweetest, caring woman that they and so many others loved.

Warmest Regards,

Lonna Cave (**Sister of Rosanne Boyland*)



Lonna Cave spoke with investigative journalist Cara Castronuova back in December of 2021 asking the Biden Administration for an investigation into the J6 death of her sister, Rosanne Boyland. **She was ignored.** Four years later, she is pleading with the Trump Administration to investigate the J6 death of one of his biggest supporters.



Rosanne Marie Boyland Bio

(April 26, 1985 – January 6, 2021)

Rosanne Marie Boyland was a beloved daughter, sister, and friend whose kindness, humor, and adventurous spirit left a lasting impression on everyone who knew her. Born and raised in Georgia, Rosanne brought joy wherever she went—curious, warm-hearted, and always ready to help others.

She shared an especially close bond with her father, Bret Boyland. They were best friends as much as family, spending countless hours fishing, camping, digging for crystals, and exploring the outdoors. Rosanne loved road trips with her parents, Cheryl and Bret, traveling across the country in their RV and stopping at quirky roadside attractions and scenic parks. One of their final trips took them to Roswell, New Mexico—an adventure Rosanne eagerly requested, reflecting her love for the mysterious and whimsical, from aliens and ghosts to hidden treasures in the earth.



At home, Rosanne filled her family's life with laughter and warmth. She loved cooking and sharing meals, especially her father's homemade spaghetti with his "special sauce," her favorite comfort food. She delighted in recreating recipes from her favorite local restaurant, The Italian Kitchen, turning simple family dinners into cherished moments of connection and joy.

Rosanne's compassion ran deep. After overcoming her own struggles, she achieved seven years of sobriety and dedicated her life to helping others do the same. As a drug counselor, she offered empathy, encouragement, and hope, believing strongly in redemption and second chances. Her sister, Lonna Cave, remembers her as "a beautiful person with a heart of gold, who would give the shirt off her back for anyone."

Attending January 6, 2021, meant a great deal to Rosanne. It was the first time she had ever voted in a presidential election, and she was deeply proud to have participated and to have supported President Donald Trump. She wanted to be present to peacefully exercise her First Amendment rights. On that day, she still wore her "I Voted" sticker on her jacket—a quiet symbol of civic pride and hope. The last thing she deserved was to lose her life for attending a constitutionally protected protest.

Though her life was tragically cut short, Rosanne will be remembered not for how she died, but for how she lived—with love, laughter, courage, and an open heart. Her spirit lives on in her family, in the lives she helped heal, and in the countless memories of a woman who believed deeply in kindness, freedom, and second chances.



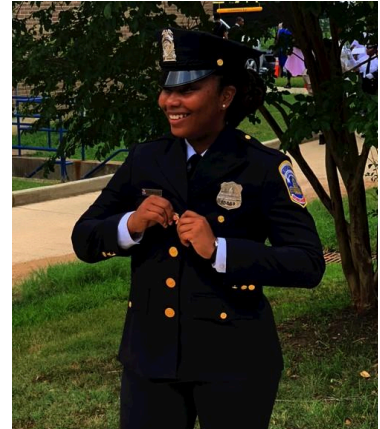
MPD Officer Lila Morris Profile

A PRINCIPAL SUBJECT OF THIS CRIMINAL REFERRAL

This criminal referral concerns the conduct of **Metropolitan Police Department (MPD) Officer Lila Morris** in connection with the death of **Rosanne Boyland**, a peaceful protester who collapsed and became unconscious on the west side of the United States Capitol on January 6, 2021.

Video evidence reviewed by journalists and investigators depict Officer Morris brutally striking Ms. Boyland's unconscious body, including blows to the head and torso, while she lay motionless

on the ground. The footage shows that Ms. Boyland had no prior interaction with Officer Morris, posed no threat, and was already incapacitated at the time force was applied. The attack was unprovoked and occurred while Ms. Boyland was defenseless.



Officer Morris is seen using a stick or baton-like object that was not department-issued or authorized crowd-control equipment, raising serious questions regarding improper weapon use. Based on publicly available MPD training standards and use of force protocols, striking an unconscious individual—particularly in the head—violates established law enforcement training, escalation procedures, and duty-of-care obligations. Such conduct creates a substantial risk of serious bodily injury or death and, based on the totality of the circumstances, may constitute criminally negligent or intentional lethal force.

Despite the severity of the incident and the availability of video evidence, no independent investigation was conducted by the U.S. Department of Justice, an external prosecutor, or any neutral oversight body. The only review conducted was an internal Metropolitan Police Department inquiry, initiated only after journalists—not family members—filed complaints and forced the issue into public view. MPD ultimately cleared Officer Morris of wrongdoing without public explanation, transparency, or independent review.

After Ms. Boyland's death, Officer Morris faced no disciplinary action, remained employed by MPD, and was later publicly rewarded, including being invited to attend the Super Bowl as a “hero J6 cop” alongside other January 6 officers. She also testified under oath in multiple January 6 criminal trials, contributing to the prosecution and incarceration of defendants, despite unresolved questions regarding her own conduct on January 6. To date, Officer Morris has never been held accountable for her actions related to Ms. Boyland's death.

Official public records continue to list drug overdose as the cause of Rosanne Boyland's death, despite substantial video evidence and eyewitness accounts indicating that police use of force preceded her fatal collapse. The absence of an independent investigation, combined with internal exoneration and subsequent commendations, raises serious concerns regarding institutional bias, suppression of evidence, and obstruction of justice.

For these reasons, Officer Lila Morris is a principal subject of this criminal referral, and a full, independent investigation is requested into her actions, her compliance with training and use of force protocols, and whether her conduct constituted criminal assault, manslaughter, or other violations of federal or state law.



Other Targeted Investigation Subjects

In addition to **Metropolitan Police Officer Lila Morris**, the following individuals and entities are identified as **potentially responsible for the death of Rosanne Boyland** and warrant independent investigation:

1. **Police Officers Responsible for Less-Lethal Munitions Deployment**
 - a. The officer responsible for discharging **pepperball launchers** at Ms. Boyland, directly striking her and contributing to her incapacitation.
 - b. Officers who deployed **gas or chemical munitions** into areas occupied by Ms. Boyland, resulting in inhalation of gas, respiratory distress, and contributing to her collapse.
2. **Commanding Officers and Supervisors**
 - a. Individuals who **issued or authorized orders** to use force, less-lethal munitions, or chemical agents against peaceful protesters, including orders that endangered Ms. Boyland and those around her.
 - b. Officers who **failed to intervene** when Ms. Boyland was incapacitated or when force was applied outside departmental protocol.
3. **Officials and Oversight Entities Involved in Cover-Up or Negligence**
 - a. Metropolitan Police Department personnel responsible for the **internal review and clearance** of Officer Morris without an independent investigation.
 - b. Medical examiners, including the coroner who determined the official cause of death as a drug overdose despite evidence to the contrary.
 - c. Members of the January 6 Select Committee, other congressional staff, or officials who had knowledge of Ms. Boyland's death and its circumstances and **failed to report or investigate appropriately**.
 - d. Officials in the **U.S. Department of Justice (Biden Administration)** who were aware of the incident and did not initiate independent review or enforcement action.
 - e. Government officials who may have had knowledge of the incident, associated evidence, or cover-up activities and did not pursue investigation or accountability.
4. **Other Potentially Responsible Parties**
 - a. Any government official, member of Congress, or law enforcement officer involved in planning, executing, or authorizing the use of excessive force or unconstitutional tactics against Ms. Boyland or other peaceful protesters that day.
 - b. Individuals who participated in, facilitated, or approved the dissemination of false information regarding the cause of Ms. Boyland's death - specifically MPD Investigators, Detectives, IAB/MPD.C. personnel, and Capitol Police officers that testified before the Democrats' J6 Select Committee.
 - c. D.C. Federal Judges (like Judge Boasberg) who refused to allow "Defense of 3rd Party" defenses in J6 cases, who blocked any mention of Rosanne Boyland's death, or called Rosanne Boyland's death at the hands of law enforcement officers "make-believe".

Recommendation:

Each of the above parties should be **subject to independent investigation** to determine their potential liability - including, but not limited to - murder, violations of civil rights, assault, manslaughter, obstruction of justice, and related criminal conduct. All internal departmental findings, communications, video evidence, and witness testimony should be reviewed by an independent prosecutorial or oversight body.



CRIMINAL REFERRAL

November 12, 2025

Compiled by: Cara Castronuova

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TO:

President Donald J. Trump, Department of Justice & Federal Bureau of Investigation

ATTN: President Donald J. Trump, The Honorable Pam Bondi & The Honorable Kash Patel

FROM:

Cara Castronuova

SUBJECT: Death of Peaceful Protester Rosanne Boyland on January 6, 2021

Caused by **Excessive Police Force** and **Subsequent Cover-Up**

Concerning Washington, D.C. **MPD (Metropolitan Police Department)**, **USCP (U.S. Capitol Police)**, MPD Officer **Lila Morris**, and other unnamed J6 Police Officers & **CDU (Civil Disturbance Unit)** Commanders

SECTION I: EXECUTIVE SUMMARY

INTRODUCTION AND ALLEGATION

Overwhelming evidence shows that J6 police caused the death of peaceful protester Rosanne Boyland on January 6, 2021. Evidence will show that Biden Administration authorities and the January 6th Select Committee covered up the truth.

Boyland died in the Lower West Terrace tunnel after being struck by police munitions and beaten while incapacitated. **She was hit in the forehead with a pepper ball, fell into a crush caused by police crowd-control tactics, was engulfed in chemical agents, and then bludgeoned while unconscious by Officer Lila Morris's stick.**

This can be proven by videos, sworn eyewitness testimony, expert use of force analysis, and new autopsy findings. Boyland's death was caused by the culmination of a series of criminal and improper law-enforcement actions by both command and field personnel.



Politically motivated misrepresentations by the Biden Administration, the MPD, USCP, and the January 6th Select Committee continue to mislead the American people — failing to hold accountable the negligent and criminal actors involved.

The Washington, D.C. OCME (*Office of the Chief Medical Examiner*) fraudulently certified Boyland's cause of death as "acute amphetamine intoxication." However, three independent medical examiners who reviewed all autopsy records unanimously concluded that Boyland's actual cause of death was NOT "drug overdose" - but likely "asphyxia". This came before further video emerged showing more details of Boyland's death. use of force experts will testify that the police beating, violence, chemical exposure, and trauma she endured in the tunnel caused her death.

This miscarriage of justice dishonors the life of Rosanne Boyland, whose death and cause of death remain largely unknown to the American public. It also is a testament to the unlawful misinformation campaign concocted by the Biden Administration to obstruct justice and knowingly deceive the American people to advance a political agenda and eradicate President Trump and his supporters.

TIMELINE OF EVENTS (Summary)

(4:20:02pm) Officers begin rapid-fire of Pepper Ball Projectile Munitions.

(4:20:12pm) Direct Pepper-Ball/Projectile Strike to Rosanne Boyland.

(4:20:22pm) Police unlawfully use Batons & Shields to push protesters out of the tunnel.

(4:22:00pm) 7+ Deep Pile-Up of bodies at mouth of tunnel with multiple unconscious.

(4:27:53pm) MPD Officer Morris delivers three (3) strikes to unconscious Rosanne.

(4:29:37pm) Trump supporters remove Rosanne Boyland from melee and begin emergency CPR.

(4:30:48pm) Rosanne's body is delivered to police officers to receive medical treatment.

(4:33:08pm) MPD Officer Beaver prepares AED for use and breaks the unit.

(4:35:53pm) New AED unit is attached to Rosanne - "...No Shock Advised...".

(4:39:47pm) A Park Police medic reports, "I've got agonal respiration...no pulse."

(4:40:43pm) A second Park Police medic intubates Rosanne.

(4:45:35pm) Rosanne is moved onto a makeshift cart to the Crypt, CPR Continues.

(4:48:25pm) Makeshift cart carrying Ms. Boyland passes the Memorial Door on the Crypt Level.

(4:48:54pm) D.C. Fire and EMS paramedics transfer Rosanne to EMT Stretcher.

(4:50:12pm) EMT Stretcher stopped near the House Wing Door.

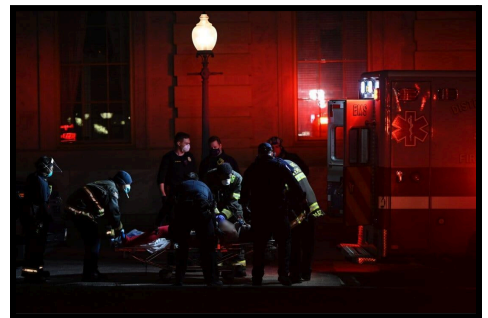
(5:31:07pm) RB placed back on the EMT Stretcher and taken to the Law Library.

(5:32:53pm) Emergency crews exit with Rosanne on EMT Stretcher to EMS Squad.

(5:33:40pm) EMS Squad and Ambulance pull away from Capitol building.

(6:00:00pm) EMS Squad and Ambulance arrive at G. W. University Hospital.

(6:09:01pm) Rosanne Boyland is officially pronounced deceased.



STATEMENT OF FACTS

Regarding the events leading to the death of Rosanne Boyland

Crowd Compression and Denial of Medical Aid

Police deployed improper use of chemical munitions and pepperball rounds into the tight West tunnel area, suffocating protesters and officers alike. Boyland is hit square in the head with a close range pepper ball and falls. Police began to aggressively advance and push the crowd, causing a stampede and human pileup of bodies. After being hit with the close range pepper ball, Boyland is then trapped under a human pile up caused by police. Audio captures demonstrators shouting **“She’s dying—help her!”** while officers continued using chemical agents and attacking the crowd. No officer is recorded rendering medical aid or assistance of any kind for over 12 minutes as Boyland lay dying.

Beating by Officer Lila Morris

Body-camera footage (View [HERE!](#)) from several angles show Officer Morris delivering (3) unauthorized and illegal full-force downward strikes to an unconscious Ms. Boyland with an unauthorized walking stick. No threatening action is visible from Ms. Boyland—she is lying prone and seemingly unconscious.

A direct eyewitness and Boyland’s friend, Justin Winchell, will testify to the Committee and FBI that Rosanne Boyland was alive when Officer Lila Morris beat her. Eyewitnesses can be heard pleading for the blows to stop.

Later on, J6 Defendant Luke Coffee raises a crutch between Officer Morris and Rosanne, seemingly to shield her from Lila Morris as J6 Defendant and Sheriff Colton McAbee is seen reaching toward Ms. Boyland, apparently to help to resuscitate her. All of this happens as both men are being hit with batons and sprayed continuously with tear gas and OC spray.

Recovery and Pronouncement of Death

At roughly 4:30pm, civilians removed Ms. Boyland from the tunnel and attempted resuscitation. At approximately 4:33pm Rosanne is brought to the mouth of the tunnel (View [HERE!](#)) and turned over to Law Enforcement Officers for emergency medical attention. No MPD or USCP officer is recorded showing any concern, nor attempting to provide medical treatment in spite of seeing her unconscious body for over 5 minutes as Trump supporters plead with them for assistance. Between 4:34pm and 5:33pm MPD EMT, Park Police, Capitol Police and others administer CPR to Rosanne Boyland. Rosanne Boyland leaves the Capitol at 5:33pm and arrives at GW University Hospital at 5:59pm. At 6:09pm Rosanne is officially pronounced deceased.

Official Cause-of-Death Announcement

(Expert medical examiners we are in contact with are willing to testify that the death of Rosanne Boyland was caused by the actions of Law Enforcement Officers on January 6, 2021.) Yet, on April 6, 2021, The D.C. Medical Examiner publicly declared the cause of death to be “acute amphetamine intoxication.” The statement was released even before the family was informed. Three independent pathologist experts later described the findings in the government’s autopsy report as inconsistent with fatal overdose, and should have been ruled “asphyxiation” (likely caused by police gasses and brutality).



The government autopsy also failed to mention bruising or damage on the face or forehead of Boyland that was obvious in photos that have since emerged.

Expert Medical Examiners now willing to testify also mentioned that a more thorough consideration of external visible injuries, environmental variables, additional testing of fluid in the lungs, and a forensic analysis of signs for neck injuries **should have been done**. Forensic and video evidence that has since emerged that were unavailable for autopsy review at the time now points to other causes of death-including blunt force trauma.

Withholding Complete Autopsy Report from Family

The complete autopsy report was withheld from the family for a year and released only after Rosanne Boyland's parents were forced to sue the government for the full, unredacted autopsy report. Once in hand, the complete report raised far more questions than it answered. When the family tried to seek answers to those questions, they were stone-walled and forced to seek a second autopsy in an attempt to get those answers. However, the original medical examiner report had disparities, did not test for known environmental variables (for tear gas or CS Spray in the fluid of the lungs), nor did it account for possible trauma that Rosanne suffered according to eyewitness accounts (crushing and beating by Officer Lila Morris). For these reasons, and the deliberate nature of these aspects, we believe this is indicative of a wider and broader cover-up as to the actual COD (cause of death) determination from the Medical Examiner's office.

Use of Force and Crowd Control Expert Witness

The nation's leading *use of force* and *Crowd Control* court-certified Expert Witness (*with nearly 40 years of service across six agencies in three states within state, federal, and tribal levels of government*) - **Stanley Kephart** - has said, **"...I cannot recall a more egregious abuse of authority than the actions of Officer Lila Morris against the lifeless body of Rosanne Boyland."** **Mr. Kephart is willing to speak with FBI investigators and/or testify before Congress under oath.**

Mr. Kephart goes on to say, "This was not a failure of training - it was gratuitous violence born of anger and frustration. Such conduct directly contradicts the principles officers are taught: to use only the minimum force necessary to effect an arrest." Further, Kephart said that the officers in close proximity to Lila Morris "had a legal and moral duty to intervene and stop Officer Morris's **UNLAWFUL ACTIONS**. Failure to act when capable of preventing harm constitutes a criminal offense."

Evidentiary Suppression and Emerging Record

From 2021 through 2024, much of the tunnel footage remained sealed. Recently unsealed recordings show officers repeatedly discharging pepper-ball guns and gas canisters at close range into the same confined tunnel area where Ms. Boyland collapsed. These recordings were reportedly in the possession of the January 6 Select Committee but were not made public. Most of the material now circulating was located and compiled by independent journalists and online researchers rather than released through official channels. Observers allege that additional unreleased videos still exist and could further substantiate the events described. A full and transparent investigation by federal authorities could



uncover additional footage and documentation bearing directly on accountability for Ms. Boyland's death.

Taken together the summary of facts listed above, *in combination with the specific underlying supporting evidence in the DETAIL sections of this document*, illustrate that Ms. Boyland's death was caused by police on January 6th in the Lower West Terrace tunnel after improper use of chemical impact munitions, reckless and aggressive crowd-control tactics, blunt-force assault, and denial of prompt and professionally trained medical care. All of this was followed by intentional public misstatements, delayed disclosures, manipulation of key evidence, and an end to all communication with Rosanne's family.

LEGAL BASIS AND REQUESTED ACTIONS

Potential Statutory Authorities Violated

Under federal civil rights statutes (42 U.S.C. §1983) and color of the law provisions (18 U.S.C. §242), any law enforcement officer who willfully subjects an individual to excessive force or deprivation of constitutional rights can be held criminally and civilly liable. In Rosanne Boyland's case, the evidence supports a claim of wrongful death through excessive and reckless force by law enforcement personnel acting under government authority.

The following potential statutory authorities were violated by those involved in the events surrounding the death of Rosanne Boyland include, but are not limited to:

- **18 U.S.C. § 241** – Conspiracy Against Rights
- **18 U.S.C. § 242** – Death or Deprivation of Rights Under Color of Law
- **18 U.S.C. § 1111** – Murder (First or Second Degree)
- **18 U.S.C. § 1112** – Manslaughter and/or Involuntary Manslaughter
- **18 U.S.C. § 1519** – Destruction or Falsification of Records in Federal Investigations
- **18 U.S.C. § 371** – Conspiracy to Defraud the United States

Requested Actions

Based upon the foregoing, we are respectfully requesting that your organization(s) do the following:

- **NEW Republican-led J6 SubCommittee Investigation** into the death of Rosanne Boyland with a public hearing broadcasting their findings.
- **FBI Investigation** into any criminal wrongdoing by the police officers responsible for the death of Rosanne Boyland including, but not limited to, Lila Morris.
- **Department of Justice criminal indictments and charges** for those police officers potentially responsible for the death of Ms. Boyland including, but not limited to, Lila Morris.
- **Department of Justice criminal investigation** into rogue Biden Administration officials that worked to cover up the cause of death of Rosanne Boyland.
- **Immediate preservation and release** of all MPD and USCP BWC (*Body-Worn Camera*) and CCTV footage from 4:00pm–5:00pm on January 6, 2021.



- **Immediate collection and preservation** of all email, text, and call logs belonging to relevant MPD, USCP, and CDU commanders/officers including, but not limited to, the OCME.
- **Independent inquiry** into the actions of **Officer Lila Morris**, other **officers**, and supervising officers for possible civil-rights violations, use of force violations, and assault violations.
- **Review of command-level decisions** within CDU Authority and Command structure authorizing chemical-munitions deployment within the Lower West Terrace tunnel.
- **Forensic re-examination** of Ms. Boyland's autopsy by independent medical experts, to include testing for pepper spray, OC spray, CS gas, and/or tear gas.
- **Comprehensive investigation** into potential suppression or alteration of evidence by The January 6th Select Committee, MPD, USCP, CDU, HSS, or any other federal entities involved on January 6, 2021.
- **Final Press Release** to the American People announcing the findings, disciplinary actions of those involved, any changes in policy to ensure this cannot happen again, and a final determination as to the COD for Rosanne Boyland to properly restore her reputation and legacy to what it should have been all along.

CONCLUSION

The record now available depicts a sequence of events in the Lower West Terrace tunnel that demands independent oversight. The evidence demonstrates improper use and deployment of projectile munitions, excessive and prohibited use of chemical weapons in a confined space, excessive and illegal use of batons and weapons in a manner that recklessly endangered the life of all demonstrators, **excessive and malicious force against an incapacitated woman**, failure to render prompt and competent emergency medical aid, inaccurate public reporting of the cause of death, and delayed disclosure of crucial video evidence. A thorough, transparent investigation by the Department of Justice, the FBI, and appropriate congressional committees is absolutely necessary to establish to correct the historical record about January 6th, and restore public confidence in law-enforcement accountability.

CERTIFICATION

I certify that the foregoing information is true and correct to the best of my knowledge and belief. I respectfully request that this matter be reviewed and investigated.

Sincerely,

CARA CASTRONUOVA

LindellTV- White House Correspondent and Investigative Journalist

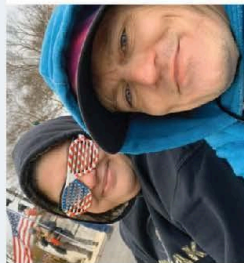
The Gateway Pundit, Investigative Journalist



SECTION II: STORYBOARD

THE DEATH OF ROSANNE BOYLAND
ON JANUARY 6TH CAUSED BY POLICELOCATION: THE UNITED STATES CAPITOL
JANUARY 6TH, 2021

EXHIBIT 1



January 6th, 2021- A happy Rosanne Boyland and her best friend Justin Winchell take a moment to document a moment that was special to them.

DESCRIPTION

SOURCE

Justin Winchell
Washington D.C.

LOCATION

EXHIBIT 2



Rosanne Boyland marches peacefully to the Capitol after listening to President Trump speak at the Ellipse.

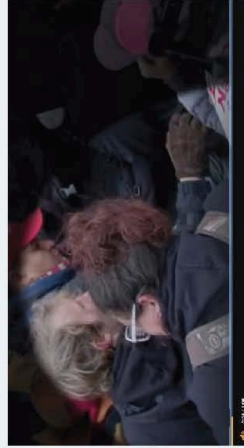
DESCRIPTION

SOURCE

Crowdsourced
En route from Ellipse to Capitol

LOCATION

EXHIBIT 3



Rosanne approaches the West Capitol stairs following the crowd.

DESCRIPTION

Footage in possession of J6 Select Committee.

SOURCE

Capitol Lower West Tunnel Entrance

LOCATION

EXHIBIT 4



J6 Police unleash 250 ft/sec. pepper ball rounds directly at protestors (violating all "Use of Force" protocols).

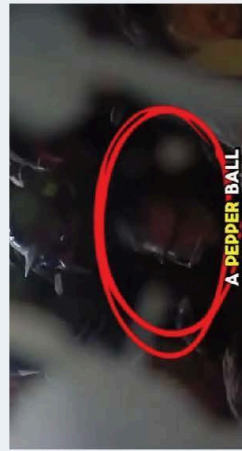
DESCRIPTION

SOURCE

Police BWC footage of Sarah Beaver
Capitol Lower West Tunnel Doors

LOCATION

EXHIBIT 5



Rosanne Boyland is hit directly in the forehead by a high speed pepper ball impact projectile from 8-10ft away - point blank range!

DESCRIPTION

SOURCE

CCTV footage
Lower West Terrace Tunnel Entrance

LOCATION

EXHIBIT 6



Boyland collapses underneath a police stampede after being hit by a close range pepper ball round. A munition wound is clearly visible on her forehead and ignored in the autopsy.

DESCRIPTION

SOURCE

Police BWC footage of Sarah Beaver
Lower West Terrace Hallway

LOCATION



THE DEATH OF ROSANNE BOYLAND ON JANUARY 6TH CAUSED BY POLICE

LOCATION: THE UNITED STATES CAPITOL
JANUARY 6TH, 2021

EXHIBIT 7



DESCRIPTION
In violation of all protocol, chemical munitions are fired within a small tunnel. Chaos ensues and police aggressively misuse batons & shields, forcing demonstrators to fall and get painfully crushed - some almost die.

SOURCE

CCTV footage

Capitol Lower West Terrace Tunnel

EXHIBIT 10



DESCRIPTION
MPD Officer Lita Morris winds up with an overhead swing and viciously assaults the unconscious body of Rosanne, striking her on the body and head three times with full body force.

SOURCE

Crowdsourced

EXHIBIT 8



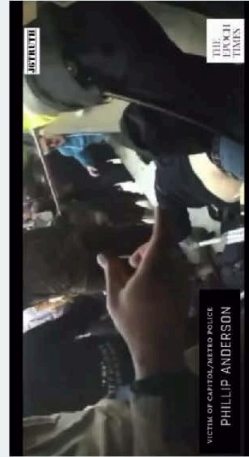
DESCRIPTION
Body pile-up caused by J6 police brutality- with Rosanne Boyland at the bottom and people screaming for help for those being trampled in the chaos.

SOURCE

Mainstream media

Capitol Lower West Tunnel Entrance

EXHIBIT 11



DESCRIPTION
J6 Police Officer Lita Morris strikes the unconscious body of Rosanne Boyland as the crowd watches in terror and screams to stop. **"YOU ARE KILLING HER!"**

SOURCE

Police BWC Footage

Capitol Lower West Tunnel Entrance

EXHIBIT 9



DESCRIPTION
As the pile-up clears, Boyland and Phillip Anderson are unconscious at bottom. Jake Lang (bottom left) attempts to save their lives and spends 4 years in solitary confinement for his efforts.

SOURCE

Police BWC and crowdsourced

EXHIBIT 12



DESCRIPTION
Police Officer Lita Morris was honored at the Superbowl and by D.C. Mayor Muriel Bowser for her "heroic actions" that day. Morris has faced no accountability for her abhorrent actions.

SOURCE

Mainstream media

Superbowl LV on 2/7/2021



THE DEATH OF ROSANNE BOYLAND ON JANUARY 6TH CAUSED BY POLICE

LOCATION: THE UNITED STATES CAPITOL
JANUARY 6TH, 2021

EXHIBIT 13



DESCRIPTION
Trump supporters desperately perform CPR on an unconscious Rosanne. Many of these men were arrested and imprisoned for years as a result.

SOURCE
Unaired footage in possession of J6 Select Committee

LOCATION
Capitol Lower West Tunnel Stairs

EXHIBIT 16



DESCRIPTION
Off-duty Sheriff Ronald MacAbee desperately works on the body of Rosanne Boyland as police continue to spray the crowd. He was ultimately sentenced to five years in prison.

SOURCE
Police BWC footage

LOCATION
Capitol West Terrace Tunnel Entrance

EXHIBIT 14



DESCRIPTION
Trump supporters beg police to help resuscitate Rosanne Boyland. Their cries are ignored and some are gassed and beaten by police for their efforts.

SOURCE
Unaired footage in possession of J6 Select Committee

LOCATION
Capitol West Terrace Tunnel Stairs

EXHIBIT 17



DESCRIPTION
Frustrated Trump supporters and eyewitnesses accuse police of killing Rosanne Boyland. Many became J6 political prisoners shortly thereafter.

SOURCE
Police BWC footage

LOCATION
Capitol West Terrace Tunnel Entrance

EXHIBIT 15



DESCRIPTION
Protesters desperately work on the body of Rosanne Boyland as police officers within the tunnel continue to assault and spray the crowd with OC spray, tear gas, and other munitions.

SOURCE
Crowdsourced

LOCATION
Capitol West Terrace Tunnel Stairs

EXHIBIT 18



DESCRIPTION
Trump supporters convince police to finally try to help Boyland and hand her body over to law enforcement for emergency medical treatment

SOURCE
Police BWC footage

LOCATION
Capitol West Terrace Tunnel Entrance



THE DEATH OF ROSANNE BOYLAND ON JANUARY 6TH CAUSED BY POLICE

LOCATION: THE UNITED STATES CAPITOL
JANUARY 6TH, 2021

EXHIBIT 19



MPD Officer Sarah Beaver breaks the AED machine when first giving Rosanne Boyland medical attention.

SOURCE Police BWC footage, Sarah Beaver
LOCATION Capitol Lower West Terrace Hallway

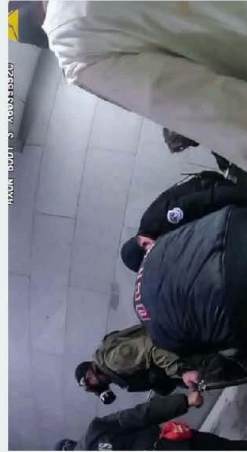
EXHIBIT 20



MPD Officers, Fire Battalion Chief, and Capitol Hill Police discuss what to do with Rosanne Boyland's body.

SOURCE Police BWC footage
LOCATION Capitol Lower West Terrace Hallway

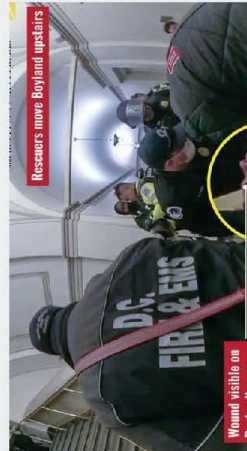
EXHIBIT 21



Officers and medics transport Rosanne on makeshift cart to get EMT medical attention.

SOURCE Police BWC footage
LOCATION Capitol Lower West Terrace Hallway

EXHIBIT 22



Officers and medic personnel carry Rosanne Boyland up the stairs to meet EMT medical staff.

SOURCE Police BWC footage
LOCATION Capitol Lower West Terrace Stairs

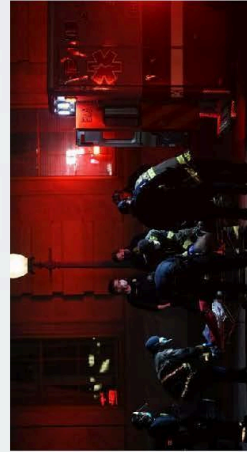
EXHIBIT 23



EMT medics remove Rosanne Boyland from makeshift cart and perform CPR for approximately 30 minutes.

SOURCE Crowdsourced cell phone footage
LOCATION Capitol House Speaker Office Hallway

EXHIBIT 24



Rosanne Boyland is transported to GW Hospital where she is pronounced deceased at 6:09pm.

SOURCE Mainstream media
LOCATION Law Library Entrance with Ramp



THE DEATH OF ROSANNE BOYLAND ON JANUARY 6TH CAUSED BY POLICE

LOCATION: THE UNITED STATES CAPITOL
JANUARY 6TH, 2021

EXHIBIT 25



Photo showing pile of bodies stacked up after MPD Officers created a stampede at Lower West Tunnel.

DESCRIPTION	New York Times, Jan 15, 2021
SOURCE	Capitol Lower West Tunnel Entrance
LOCATION	

EXHIBIT 26



New York Times claims Rosanne Boyland died during stampede to get into the US Capitol Building.

DESCRIPTION	New York Times website
SOURCE	January 15, 2021
DATE	

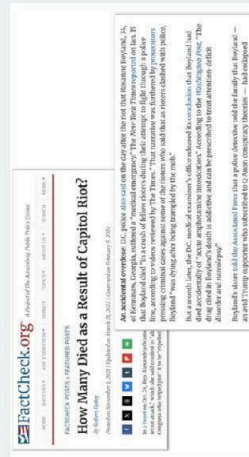
EXHIBIT 27



The Daily Beast, Independent, CBS, AP, and others report Rosanne Boyland died of a drug overdose after the government inaccurate medical examiner report is released.

DESCRIPTION	Various mainstream news sites
SOURCE	April 8, 2021
DATE	

EXHIBIT 28



FactCheck.org article saying Rosanne Boyland died of a drug overdose

DESCRIPTION	FactCheck.org news site
SOURCE	November 1, 2021
DATE	

EXHIBIT 29



Rosanne Boyland's nieces left behind.

DESCRIPTION	Boyland family
SOURCE	Georgia, USA
LOCATION	

EXHIBIT 30



Rosanne Boyland with her parents, who are now asking for an investigation.

DESCRIPTION	Boyland family
SOURCE	Boyland family vacation
LOCATION	



SECTION III: WITNESSES

Witness List

The following is a list of potential key witnesses. We know of at least five more eyewitnesses, more use of force experts, medical examiners, video analysts and experts in the subject matter that are willing to/can testify as well.

Name	Contact	Role/Type	Affidavit
Justin Winchell	Phone/Email	Eyewitness - Rosanne's best friend	Yes
Stanley Kephart	Phone/Email	use of force Expert Witness	Yes
Steven K. Hill	Phone/Email	use of force Expert Witness	Yes
Philip Anderson	Phone	Eyewitness (Almost died with Rosanne)	Yes
Ronald McAbee	Phone	Eyewitness (Fought to give Rosanne CPR)	Yes
Michael Foy	Phone/Email	Eyewitness (Tried to Save Rosanne Boyland)	Yes
Luke Coffee	Phone	Eyewitness (Tried to protect Rosanne from beating)	Yes
Thomas Tatum	Phone/Email	Eyewitness (Beside Rosanne under pile)	Yes
*Edward "Jake" Lang	Phone	Eyewitness (Tried to Save Rosanne)	TBD
Lonna Cave	Phone	Family - Sister	No
Bret & Cheryl Boyland	Phone	Family - Parents	No
Cara Castronuova	Phone	Investigative Journalist who prepared this report	Yes



Justin Winchell, Eyewitness & Best Friend to Rosanne Boyland

AFFIDAVIT OF FACT

I, Justin Fairbanks Winchell, being duly sworn, depose and state under penalty of perjury that the following is true and correct to the best of my knowledge:



1. I witnessed the death of my friend Rosanne Boyland at the hands of police on January 6, 2021.
2. We traveled together from Georgia by car to see President Trump speak.
3. At first, this was truly one of the most glorious, positive, and hopeful days of my entire life. It was a day with hope, with light, unity, humanity, and truth under God for this great nation. About what things could have been.
4. However, it all changed. First, the PA on the podium where the speakers were, including the President, was inaudible and impossible to hear. No cellular data had been able to go out - no pictures, no texts. All phone calls dropped. The service was definitely suffocated so no media content could get in or out, either, from the large number of people, or something else.
5. Later when Rosanne and I arrived at the Capitol, it quickly became one of the most violent and disgusting displays of police brutalitys I have ever witnessed in life.
6. As we approached, the tear gas, concussions from the flash bangs, and rubber bullets filled the air and bit our skin, eyes, and flesh.
7. There were a handful of individuals that seemed out of place wearing earpieces (who I suspected were Antifa, Feds, or Agents) in the crowd trying to push us into the police, but there was nowhere to go. Rosanne and I got separated, and she got pushed into the tunnel.
8. Next thing I knew, I was clinging to Rosanne's fingers, arms, and her hoodie trying to pull her from underneath the sea of people that were being trampled and beaten by the police. I didn't even know it was her at that moment, as I had pulled several others away from the onslaught from the officers.
9. I tried for a third time to pull her, with no luck. Then a police officer laid blow after blow, bashing her body and head in front of me. Blood was pouring out of her eyes, ears, and mouth and she gasped, "help me!" She was alive when a police officer beat her with the stick.



10. Two gentlemen laid down their lives to help. They began performing CPR on her body and tried to revive her. They did CPR compressions on her chest plate, then cut off her hoodie with med scissors leaving her lifeless body concussing. They tried desperately to bring her back. Unfortunately, it was not working.
11. Only after everyone had been beaten down and there was no one left to beat did the officers finally answer my calls and pleas for help. After protesters begged for medical assistance, they turned her over to police. The police grabbed her body by the feet and dragged her away. After this I made my way down the steps, bewildered, as I couldn't see and was trying to flush my eyes out with water from all the tear gas.
12. Once away from the Capitol, I called Rosanne's dad. He told me that the police had called him and notified him that she had died inside the U.S. Capitol in the rotunda and collapsed from a drug overdose which I knew was not the case, as she had been completely sober and was with me the whole day. None of it made any sense.
13. I then made my way towards the hotel and saw police were continuing to attack anyone who was on the street. When I got to the hotel people were collecting themselves, as most of us were astounded as to what had just happened.
14. It was very apparent that there was an abundant orchestration of staged aggression. What began as a day for truth to be told, quickly turned into one of the worst days of my life, and Americans - including myself - became the hunted and the executed.
15. I was afraid to come forward until this point because I was fearful of being persecuted myself by the Biden Administration. I am no longer afraid and willing to testify as to what I saw that day, in honor of my dear friend Rosanne Boyland.



Stanley Kephart, *use of force and Crowd Control Expert*



Stanley Kephart Declaration



October 21, 2025

Kephart Consulting, LLC

3180 Touchmark Boulevard, Suite 420 Prescott, AZ 86301



I have personal knowledge of the following facts and, if called as a witness, could and would competently testify thereto. Further, I am recognized as one of the nation's leading experts in crowd management and crowd control, and I am certified as a court-qualified expert in the use of force, impact weapons, and chemical munitions

Department policy exists to protect citizens, officers, and the agency itself. It is grounded in law and shaped by training designed to reflect best practices. Policies evolve in response to new legal mandates, technological advancements, and shifting tactics—they are living documents. In this instance, Officer Morris's conduct violated both the letter and the spirit of any reasonable use of force policy. As a certified instructor in the use of the 26-inch baton, PR-24, and collapsible batons, I can state unequivocally that strikes to the head are prohibited and that striking a downed or unconscious person is never an option. The proper response is to handcuff and secure the individual. There is no policy justification for striking an unconscious subject, nor could such conduct ever be deemed "objectively reasonable."

LEGAL FRAMEWORK

1. Lieutenant (now Captain) David K. Augustine of Washington, D.C. Metropolitan Police Department testified that the actions of Officer Lila Morris, who struck the unconscious and prone Rosanne Boyland with a stick (not her issued baton), were "objectively reasonable."
2. The term *objectively reasonable* originates from the U.S. Supreme Court's 1989 decision *Graham v. Connor*, 490 U.S. 386. That ruling held that excessive force claims must be evaluated under the "reasonable officer" standard. That standard is interpreted to mean whether a similarly trained and experienced officer would have acted the same way under the totality of the circumstances, without the benefit of hindsight.
3. Graham vs Connor Litmus Test:
 - All law enforcement use of less-than-lethal force requires successful completion of government-approved training and certification.
 - The application of less-than-lethal force must strictly comply with the agency's policies and procedures.
 - Every use of force must conform to the law.
4. I am a retired Chief of Police with nearly forty years of service across six agencies in three states, and have held state, federal, and tribal commissions, at times simultaneously. I am deeply familiar with applying *Graham v. Connor* in disciplinary actions involving officers who violated their training, department policy, or the law. After an internal affairs investigation is completed, the Chief of Police reviews the investigation and serves as the appointing



authority, determining the discipline to be imposed on the employee. Discipline may result in sanctions up to and including termination.

5. **As both a former Chief of Police and a long-time expert witness in police and security disciplinary matters, I cannot recall a more egregious abuse of authority than the actions of Officer Lila Morris against the lifeless body of Rosanne Boyland. Despite the chaotic environment, the video evidence clearly shows Officer Morris repeatedly striking Boyland's unconscious body in the head and chest with a stick rather than her trained baton. This was not a failure of training—it was gratuitous violence born of anger and frustration. Such conduct directly contradicts the principles officers are taught: to use only the minimum force necessary to effect an arrest.**
6. All law enforcement use of force continuums are designed to align with the law. Once Rosanne Boyland was no longer a threat, officers are trained to immobilize and safely take her into custody—not to continue applying force.
7. It is understood that other officers, identified as Officers Hodges, Powell, Venone, and badge #1225, were in close proximity to Officer Morris during this incident. Those officers had a legal and moral duty to intervene and stop Officer Morris's unlawful actions. Failure to act when capable of preventing harm constitutes a criminal offense.

MUNITIONS^[1] ^[2]

1. Pepperball launchers, similar to the FN303 Pepperball Less Lethal Launcher, require operator certification, adherence to safety protocols, and specific training to ensure safe and effective use. All operators must be certified by the manufacturer's training team before deploying the less lethal system. This certification ensures that users are knowledgeable about the weapon's operation and safety protocols.
2. Safety warnings state the launchers are designed for tactical use and should be handled with extreme caution. It is not intended for recreational use, and misuse may result in injury or death. Operators are warned to avoid aiming at the face or head and must read the operator's manual before use.
3. Training requirements involve the completion of a training course presented by certified instructors. This training covers the proper use of the launcher, including safety measures and operational protocols.
4. Operational protocols should be in place and adhered to that dictate when the pepperball launcher can be used, such as in justifiable self-defense situations, protection of others, or prevention of escapes. **Operators must avoid deliberately shooting at the head, neck, or spinal column unless the situation dictates the use of deadly force.**



5. Pepperball launchers are less-lethal weapons that require strict adherence to safety protocols and training to ensure the safety of both the operator and the public. Proper certification, training, and the use of authorized projectiles are essential for the safe operation of this equipment.
6. The FN303 Pepperball gun and others similar have distance rules to ensure safe and effective use. General guidelines to follow:
 - A. **Minimum Standoff Distance: Personnel should avoid deliberately shooting anyone in the head, neck, or spinal column unless the situation dictates the use of deadly force.**
 - B. Target Zone: The intended target zone is low center mass unless the situation dictates otherwise.
 - C. Distance Rules: The maximum effective range against a point target is 50 meters (164 feet). The minimum standoff distance is three (3) feet.
7. It is crucial for personnel to be aware of their backdrop and the potential for serious injury when engaging targets.
8. **The munitions used in this confined space provided no realistic escape for the protesters, with persons behind them pushing forward. Additionally, the pepperballs were fired in an unsafe manner at heads and from a short distance by D.C. Metro Officers. This confined space created an oxygen-deprived environment accompanied by panicked, angry protesters who couldn't escape and who were being gassed.**

[1] <https://fnamerica.com/products/less-lethal/fn-303-tactical-launcher/>

[2] <https://www.police1.com/police-products/less-lethal/projectiles-launchers/articles/the-use-of-less-lethal-weapons-in-corrections-part-5-impact-weapons-7iqkwD7h0FbT63Ur/>

BACKGROUND

1. I am the President and CEO of Kephart Consulting, LLC, which provides consulting and expert witness services for cases related to police standards and best practices. Collectively, over the course of the last 40+ years, I have been involved in no less than 1,500 civil cases regarding police and security standards and best practices, including the use of force, crowd management, and crowd control.
2. I hold a Master of Arts in Secondary Education from the University of San Francisco and a Bachelor of Arts in Public Service from the same institution. My Master's thesis was on Police use of force.
3. I am a graduate of the San Jose, California Police Academy and have held numerous positions within multiple police departments, up to and including Chief of Police. I've held federal



positions, such as the Chief of Police for the California Cabazon Band of Mission Indians, which included serving on the Federal, State, and Tribal Law Enforcement Commissions. Additionally, I have held positions as a Federal, State, and Tribal Law Enforcement Officer serving the Salt River Pima-Maricopa Indian Community.

4. As a sworn Federal law enforcement official, I was involved in the development and implementation of policies and procedures related to the use of force and other subjects required by federal, state, and tribal accreditations.

Additional Documented Incidents of Excessive Force on January 6, 2020

- Multiple officers positioned on elevated walls fired gas munitions downward into the crowd, violating manufacturer distance requirements (as documented in *January 6th: The Real Story*).
- A patrol sergeant, not a member of the SWAT Team nor qualified to possess and deploy flashbangs, deployed flash-bang grenades into the crowd, causing burns and permanent hearing loss.
- A District of Columbia Metropolitan Police officer on the scaffolding fired directly at protesters' heads. This is in contradiction to the manufacturer's training for deploying this tool.
- Impact gas munitions were fired at protesters' legs, resulting in broken bones; video and audio are available upon request.
- A protester was pushed from elevated surfaces, causing a broken back and leg fracture.

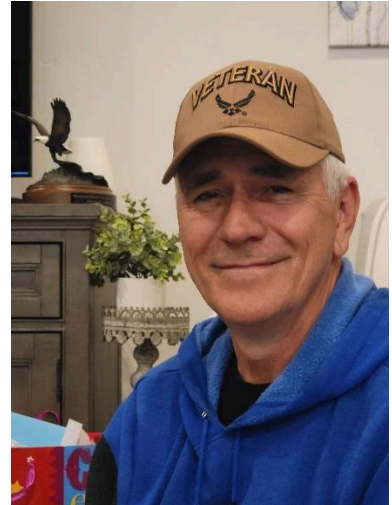


Steven Kay Hill, *use of force Expert Witness*

AFFIDAVIT

October 22, 2025

I, Steven Kay Hill, ("Affiant") being duly sworn, depose and state under penalty of perjury that as a "**use of force**" **expert** it is my belief that police actions at the US Capitol on January 6th, 2021 were both criminal and negligent and was, ultimately, the **COD (Cause of Death)** of **Ms. Rosanne Marie Boyland**. Further, the following is true and correct to the best of my knowledge:



1. I will testify that in an attempt to criminalize all actions by the protesters, and to reward the officers who were involved in these deadly force violations, the US Government indicted and convicted demonstrators on the US Capitol premises with fabricated criminal charges in an effort to lay the blame solely on demonstrators.
2. Through my investigation of over 1000 hours of video, policies, procedures and observation of the actions of demonstrators and police on that day, I watched officers in the tunnel using unlawful violent actions against the demonstrators - instead of a trained structured response from a competent incident command structure. During my investigation I observed command staff and line personnel operating in ways that would have been considered criminal had they been committed in any other location or jurisdiction within the United States.
3. I will testify that police command supervisors in the tunnel area who should have been responsible for the supervision of officers, instead, pushed through the line of officers, moving to the front in order to use deadly force on the demonstrators by beating them savagely in their heads and faces. Line officers, within proximity to these so-called supervisory personnel, appeared encouraged as they also began to use their impact weapons and chemical agents in deadly and dangerous ways against the crowd.
4. I will testify that once these actions started, officers began using excessive amounts of tear gas and pepper ball impact weapons on the crowd.



5. I will testify that Officers are prohibited by the manufacturer, by police policies, and by federal law from striking anyone in the face or head unless they are using it as a form of deadly force.
6. I will testify to the excessive use of force by officers through the improper use of the pepper ball gun. One officer firing the pepperball launcher was seen targeting the heads and faces of protesters.
7. I will testify that one of the protesters struck in the head was Ms. Boyland. She was visibly injured and affected by the impact.
8. After the pepperball launcher targeted the heads and faces of demonstrators, there was a barrage of chemical agents and a decision was made to force demonstrators outside the tunnel.
9. I will testify that excessive use of force resulted in dangerous amounts of OC and CS tear gases deployed in the tunnel by police which blinded and choked demonstrators.
10. I will testify that officers using batons, shields, and gas started pushing a tunnel full of demonstrators outside and down a flight of stairs. This push resulted in demonstrators at the mouth of the tunnel, including Ms. Boyland, tripping and falling. This resulted in bodies stacking up onto each other. Further, the officers continued to push even though the crowd was screaming frantically that people had fallen and were being crushed.
11. I will testify that at one point there were 7 or more people on top, crushing Ms. Boyland and others on the bottom of the pile. This included Philip Anderson, a demonstrator , ***unconscious himself***, pulled from the bottom of the pile directly beside Rosanne Boyland.
12. I will testify that I previously testified in the US v. Luke Coffee trial as a material and “use of force” witness.
13. I will testify that Mr. Coffee was clearly non-violent when Officer Lila Morris attacked him with a stick, and other officers used pepper spray on him. Further, to any objective analysis, it is clearly demonstrable that Mr. Coffee acted in a peaceful, non-aggressive manner to separate police from demonstrators to calm the situation and allow demonstrators to render emergency life-saving medical aid to Ms. Boyland.
14. I will testify that Mr. Coffee was egregiously charged by the US Government with multiple charges, such as using a deadly and dangerous weapon, aggravated battery on officers – *to include Officer Lila Morris* – , etc.



15. I will testify that Officer Lila Morris was illegally and criminally using a walking stick like a baton, in an overheard axe-like motion, and beat Ms. Boyland multiple times, who was unresponsive and unconscious on the ground.
16. I will testify that police actions and inactions while protesters were begging them to get Ms. Boyland medical treatment. How officers failed to act or to render any kind of assistance for a long period of time while Ms. Boyland was not breathing on the ground and being rendered CPR and First Aid by demonstrators.
17. I will testify that after a long period of inaction by the officers, demonstrators pulled and pushed Ms. Boyland into the police line. One of the officers pulled Ms. Boyland into their ranks and she was dragged inside and to the back of the lines by officers into the hallway and given medical attention.
18. I will testify to untrained officers attempting to use an automated external defibrillator (AED) instead of transferring her immediately to trained medical personnel.
19. I will testify that Officer Lila Morris was out of control that day. Officer Lila Morris's actions were out of control and so far outside of training and policy that they should be considered CRIMINAL.
20. I will testify that the cumulative use of force, coupled with the tactics police employed, were intentionally excessive and resulted in numerous injuries and deaths that day.
21. I will testify that the injuries observed on Ms. Boyland's body were consistent with the violence she encountered in the tunnel.
22. I will testify to officers using deadly force through their use of batons and impact weapons, all of which contributed to the death of Ms. Boyland.
23. I will testify that the death of Rosanne Boyland was because of being trampled and crushed by the crowd due to police criminal and negligent action that day, and that it was not by a drug overdose as has been reported by the US Government and the media.

Declaration

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Signature: _____

Printed Name: Steven Kay Hill

Date: _____



Philip Anderson, *Eyewitness Affidavit***AFFIDAVIT OF FACT**

I, **Philip Anderson**, being duly sworn, depose and state under penalties of perjury that the following is true and correct to the best of my knowledge:



1. On January 6, 2021, I was present at or near the west terrace tunnel entrance of the United States Capitol. I personally witnessed the events described herein and make this declaration based on my own firsthand observations.
2. Without warning, law-enforcement personnel deployed a chemical agent into the enclosed area. The substance immediately caused respiratory distress, severe eye irritation, and an inability to breathe. Individuals began to retreat in panic as visibility and oxygen diminished.
3. Moments later, multiple officers discharged projectiles later identified as pepper-ball rounds directly into the dense crowd at close range. One of these rounds struck a female demonstrator standing beside me, later identified as **Rosanne Boyland**, causing her to fall to the ground and become motionless.
4. As the chemical agents continued to fill the tunnel, a surge of people from the rear pressed forward. This created a crowd-compression event resulting in dozens of individuals being forced on top of one another. I was trapped beneath several layers of bodies and unable to move or breathe. I heard repeated screams from those around me for the police to stop pushing and to render aid.
5. Despite the audible pleas for assistance, the forward line of officers continued to strike downward with batons and spray additional chemical agents onto the pile of incapacitated people. The concentration of irritants was so great that it permeated clothing and skin. I experienced physical burning and disorientation while pinned at the bottom of the pile.
6. I maintained physical contact with **Ms. Boyland** for part of this time. She grasped my hand briefly before her grip weakened and released. The pressure and chemical exposure continued for several minutes until demonstrators from the rear managed to push forward and remove several individuals, myself included, from the heap.
7. Afterward, I observed officers drag Ms. Boyland's body by the legs into the tunnel interior. One officer attempted to utilize a defibrillator device but appeared unfamiliar with its



operation and, in the process of opening it, caused the electrode wires to detach, rendering the device nonfunctional. No immediate replacement unit was produced, and the failed resuscitation effort was not referenced in any official summary or after-action report publicly released thereafter.

8. These events occurred in my direct line of sight. The scene was chaotic, loud, and marked by confusion; however, the sequence of chemical deployment, crowd compression, physical strikes, and the subsequent mishandled medical response were clear and unmistakable.

I make this statement voluntarily and under oath to ensure that a complete and accurate account of these observations exists for any future review, investigation, or proceeding.

Declaration

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Signature: _____

Printed Name: Philip Anderson

Date: _____



Ronald McAbee, Eyewitness Affidavit

AFFIDAVIT OF FACT

I, **Ronald Colton McAbee**, being duly sworn, depose and state under penalty of perjury that the following is true and correct to the best of my knowledge:

1. My name is Ronald Colton McAbee, and I am over the age of 18 and competent to make this affidavit. The facts stated herein are based on my personal knowledge and observations.

2. On January 6, 2021, I was present at the United States Capitol in Washington, D.C., and witnessed the following events:

3. I observed a gas-like substance emanating from the lower west terrace tunnel (hereinafter referred to as "the tunnel"). This caused people to panic and stampede out of the tunnel, resembling a human waterfall.

4. I assisted in pulling an elderly woman to safety after she was pinned by the stampede of people exiting the tunnel.

5. I witnessed an officer being pulled down the stairs and Officer Andrew Wayte being tackled.

6. I positioned myself between the crowd and Officer Wayte to assist him. I attempted to lift Officer Wayte by his vest to help him regain his footing.

7. I observed Rosanne Boyland lying motionless in the left front corner of the tunnel. I saw blood running from her mouth, nose, and ear area. Her complexion appeared pale and light blue in color.

8. I reached for Rosanne Boyland, pointed at her to draw attention to her condition, and was struck in the head with a baton, which I believe constitutes deadly force.

9. I shouted at the officers, attempting to alert them to Rosanne Boyland's condition.

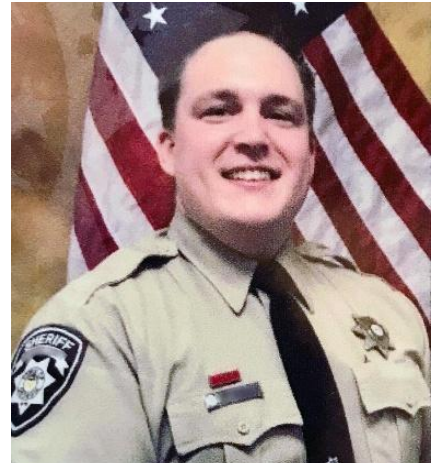
10. Officer Carter Moore then attempted to push me down the stairs by striking me in the ribs with his baton in a cross-check motion.

11. I pushed Officer Moore away from me and made another attempt to assist Officer Wayte by lifting him.

12. Officer Wayte's leg was pulled between my legs by a protester, identified as Clayton Ray Mullins, which caused both Officer Wayte and me to be dragged down the stairs.

13. I fell on top of Officer Wayte, shielding him from the crowd. I then assisted him in standing and returned him to the police line. Audio evidence from the incident will reflect that Officer Wayte said, "Get off me, man," to which I responded, "I'm trying to help you." Officer Wayte then replied, "I know, I know, help me up."

14. After Officer Wayte was secured, I observed a man performing CPR on Rosanne Boyland. I assisted by locating a breathing mask to facilitate mouth-to-mouth resuscitation and checked for a pulse on her femoral artery.



15. I, along with others, carried Rosanne Boyland to the police line. As we set her down, we were pepper sprayed.

16. An unidentified man stated, "I need compressions," and I took over performing CPR on Rosanne Boyland.

17. I was forcibly removed from Rosanne Boyland and witnessed officers dragging her into the tunnel. Her pants came off, and her breasts were exposed, resembling a deer being dragged after being shot.

18. Officer Steven Sajumon thanked me for my service and protected me from the advancing crowd and overzealous officers who attempted to spray and strike me.

19. I was subsequently arrested and charged with Obstructing, Impeding, or Assault of a Federal Officer with a Deadly or Dangerous Weapon, specifically referencing motorcycle gloves purchased from Amazon.

20. During my bond hearings, the prosecution withheld audio evidence until the trial.

21. The prosecution and Judge Emmett Sullivan stated that I was a danger to the very community I served as a Deputy Sheriff. Judge Sullivan referred to me as a terrorist in open court during a bond hearing, rendering judgment two years prior to my trial.

22. I was held in pretrial detention for 26 months and was sentenced to 70 months in federal prison in Minnesota.

23. On January 20, 2025, I was pardoned by President Donald J. Trump.

Declaration

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Signature: _____

Printed Name: Ronald Colton McAbee

Date: _____



Michael Foy, Eyewitness Affidavit**Affidavit of Fact**

- My name is **Michael Joseph Foy** and I served honorably in the United States Marines for four years from April of 2015 to April 2019.
- I was at the west terrace tunnel on January 6th 2021 between 4pm and 530pm.
- Before my actions that day, and roughly 10 minutes before I got myself involved, I remember like it was yesterday that I had noticed a lady who had appeared to me as if her eyeball had appeared to have popped out of her head. Blood covered her face as she walked around dazed, as if emerging from a war zone. I went up to her and tried to help and I looked back to the crowd yelling and waving for help, trying to get attention.
- Another lady came up to us and said she was a nurse, but the lady I was trying to help was more concerned with trying to find her child. I asked where her child was and she pointed towards the tunnel. As she pointed, I saw a group of about 50 protesters getting pushed out of the tunnel and started to fall down the steps on top of each other.
- As I'm observing and trying to understand what I'm seeing, analyzing what is happening, I see people's faces - *under other people* - turning red. I see blood on the steps. I hear people screaming at the top of their lungs for help. Women, children, the elderly - all being crushed by other protesters on top of them, trying to claw their way out but can't.
- As I continued to observe, I saw the police at the entrance of the tunnel advancing aggressively, which was making more people fall backward and pile up on top of the others. I hear screams for "help" and "I can't breathe" from protesters that are approximately 20 feet away from me.
- I made my way over to the stairs and tried to pick up two people. I could not do so due to the fact that one person's legs were underneath a heap of people and another person's jeans was ripping off his body from me pulling hard trying to help him out.
- Then I noticed two bodies at the top of the staircase lying lifeless. In my mind, 1100%, positively knew they were dead. After I assessed what was going on, I concluded the cops were the problem. They had the armor on. They were hitting people who had their hands up. Worse, they were closer to hearing the protesters' desperate cries for help than myself, but weren't doing anything.
- I didn't want to get myself involved, but I knew I had to do something. I was a Marine and I couldn't live with myself, or bear the name Marine again with honor, if I turned a blind eye. So instead of using my flag pole made out of a hockey stick as the first solution, I turned back to the crowd for help to get their attention and pointed to the tunnel. That did not work!
 - I hear more screams for "help" and hear choking and gasping. A protester handed me a PVC tube and I threw it in the direction of the tunnel in hopes of keeping space between the protesters and police, and to stop the police from advancing.



- That same protester handed me a baton but I decided against using it because the baton seemed thick and heavy which gave me the impression that I could hurt someone with it. I tried to make my way to the stairs but it was hard to move around with everyone being so tightly packed and the handrail was also blocking me from pulling people out.
- I myself was having a hard time breathing. pepper spray had gotten on my face. Then I smelled CS gas. It was as if someone had turned off the oxygen in a room and I couldn't breathe anymore. Panic had started to set in. I felt MY LIFE was now in danger, but I remained calm on the outside.
- At this point I didn't know what to do, until I heard someone say "she's dying", "she's gonna die", "she's dead." As a last resort, I looked at my flag pole and I believed that if I swung at the cops, I could get them to back up in fear which would give people time to get up, create distance between the protesters and police, and would also prevent more people from dying.
- The thing that crossed my mind was that I could be shot and die over strangers I didn't know. But to me, their lives were more important than mine and I swung at the police as menacingly as I could. I did not hit the police and not one officer testified against me or said that I hurt them. I believe the video of me looks worse than what it was but that is what I wanted the cops to think during that moment.
- I do believe more people would have died if I and others had done nothing. I did inform two family members of what I had seen the police doing. I also mentioned that I had seen two people die.
- Later, it was confirmed that one of the persons I did see, did indeed die, and that was Rosanne Boyland. RIP Rosanne.

Declaration

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Signature: _____

Printed Name: Michael Joseph Foy

Date: _____



Luke Coffee, Eyewitness Affidavit

STATEMENT OF FACTS

I, **Luke Russell Coffee**, being duly sworn, depose and state under penalty of perjury that the following is true and correct to the best of my knowledge:

- On January 6th, 2021, I witnessed a woman lose her life on the steps of the U.S. Capitol while police continued to beat her motionless body.
- **When I tried to stop the violence, I was beaten, blinded, and later portrayed as the aggressor.**
- The woman's name was Rosanne Boyland, and the truth about what happened to her has been buried beneath lies.
- As a filmmaker and journalist, I went to Washington, D.C. not to fight but to document history, pray with fellow Americans, and be a peacemaker.
- I was unarmed and carried no weapon.
- My purpose was to observe, record, and help calm a situation spiraling out of control.
- When I reached the Lower West Terrace Tunnel, I saw police deploying gas into an enclosed tunnel packed with citizens.
- Officers simultaneously pushed the crowd down steep marble stairs, crushing people who had nowhere to go.
- The air filled with gas, screams, and confusion.
- I heard women crying out, "I can't breathe" and "I'm dying."
- People began falling, piling on top of each other, struggling for air.
- I was near the bottom of the pile, pulling at arms and jackets, shouting "Stop and pray!"
- I was sprayed multiple times in the face with chemical agents at close range.
- The pain was searing, and my vision blurred completely.
- I could barely see but noticed a crutch lying at my feet.
- I picked up the crutch and held it high above my head—not as a weapon, but as a gesture of surrender and peace.
- Officer Lila Morris appeared enraged and out of control.
- She was not using a standard police baton but a large wooden walking stick she had picked up from the ground.
- She swung it wildly, striking me as I stood blinded, trying to speak words of peace.
- I did not realize the person beside me was a woman—Rosanne Boyland—until later.
- The gas and chaos made it impossible to recognize what was happening at the time.
- I later learned that Rosanne was the one lying beside me, unconscious and beaten.
- When I reached the top of the stairs, I shouted to the officers, "We are all Americans. A family divided will not stand."
- As I tried to bring peace, I was beaten again by multiple officers, including Morris.
- I was attacked for trying to protect those in need of medical help.
- As I held the crutch above me, other protesters reached Rosanne and pulled her away to attempt CPR.
- No effort was made by police to provide medical aid.



- Video evidence later showed people yelling that a woman needed help, but no officer stepped forward.
- The officers ignored their duty to protect and serve, treating everyone there as the enemy.
- Later, the government used a still image of me with my hands raised in prayer as supposed evidence of inciting violence.
- That image became my FBI "Most Wanted" poster.
- I was charged and convicted of assaulting the same officer who had beaten both Rosanne and me.
- At trial, Officer Morris testified under oath that I never touched her.
- Yet she was celebrated as a hero while Rosanne was labeled an "insurrectionist."
- The prosecution built its case on partial truths and manipulated narratives.
- The media spread lies that destroyed my reputation, freedom, and 17-year career.
- I did not go to the Capitol to fight.
- I went to be a peacemaker, to stand in the gap, and to calm a storm of fear and fury.
- I was blinded, beaten, and falsely accused for trying to stop the violence that took an innocent woman's life.
- Lies have no legs; the truth still stands.
- One day, it will all be seen clearly.
- The evil plot that casts everyday Americans as villains will be fully exposed.

Declaration

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Signature: _____

Printed Name: Luke Russell Coffee

Date: 10/23/25



Thomas Tatum, Eyewitness Affidavit

STATEMENT OF FACTS OF THOMAS EUGENE TATUM

I, **Thomas Eugene Tatum**, being duly sworn, depose and state under penalty of perjury that the following is true and correct to the best of my knowledge:



1. My name is Thomas Eugene Tatum, born February 7, 1976, in Greenville, Washington County, Mississippi. I make this statement of my own personal knowledge and declare that the facts contained herein are true and correct to the best of my recollections.
2. On January 6, 2021, I was present at the Lower West Terrace tunnel of the United States Capitol Building in Washington, D.C. from approximately 4:21 p.m. until 4:29 p.m.
3. During that period, law-enforcement officers—identified as members of the Metropolitan Police Department and the U.S. Capitol Police—continuously attacked individuals in the tunnel area using pepper spray, rubber bullets, batons, and other impact weapons. The crowd was packed tightly, and the combined force of the crowd and police actions caused a crush of people.
4. I was at the bottom of the pile-up beside Rosanne Boyland. She was pushed into me, which knocked me down, and she was unconscious the entire time she lay next to me. Officers continued to push additional people on top of us, including those who were attempting to help or render aid.
5. **Although Rosanne Boyland was unconscious, I know she was still alive before Officer Lila Morris attacked her because her skin color was normal. As I started to get up and get away, D.C. Metro Cop Lila Morris inflicted the final death blows, in my opinion.**
6. **Immediately after Officer Lila Morris began striking Rosanne Boyland and others, Rosanne's skin turned a deep purple color, indicating to me that she had died. I saw this in person, and it is visible in video footage recorded that day.**
7. In my personal assessment, what happened to Rosanne Boyland constitutes an eight-minute murder. I did not merely witness it — I experienced it, trapped beneath the weight of bodies, pepper spray, and baton strikes as her life was taken beside me.
8. I provide this statement for inclusion in any legal, investigative, or congressional proceeding concerning the events of January 6, 2021, and particularly the death of Rosanne Boyland.

Declaration

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Signature: _____

Printed Name: Thomas Eugene Tatum

Date: _____



SECTION IV: TIMELINE

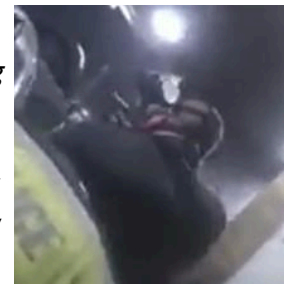
Unlawful Pepperball Launcher Rapid-Fire into Tunnel

Pepperball launcher deploys hard polymer projectiles at approximately 250 feet per second with a hard projectile that is designed to explode on impact and release pepper spray in the form of a white powder. **All training, instruction, and use of force guidelines dictate that this weapon NOT BE USED WITHIN CLOSE ENCOUNTERS and ALWAYS must be aimed at CENTER MASS (chest area).**



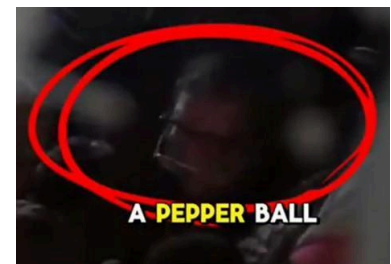
It is believed through video evidence and eyewitness testimony that Rosanne Boyland was struck square in the middle of the forehead with one of these rounds, which caused the forehead bruise in the center of her forehead, visible in multiple videos while she is being given medical attention.

1. Video evidence shows indiscriminate rapid fire from the double doors directly into the tunnel.
2. <https://youtu.be/9qQLfErI1v8> - Approximately 4:20pm to 4:21pm according to BWC X6039BCAU (Sarah Beaver)
3. It is believed that this was the time Rosanne Boyland was hit with a pepper ball directly in the forehead, which is when she went down immediately afterward and was never seen again above the fray in the tunnel.



<https://youtu.be/YwZh79OoE3Y> - This is a slowed-down, zoomed-in version to show Rosanne Boyland just as she is impacted with what is believed to be a Pepper Ball from the Pepperball Launcher in (1) above.

<https://youtu.be/2BRcoP3klzs?si=uT-XaIQDJY7PcY9B&t=1202>
This footage is taken from the camera just inside the double-doors at approximately 4:20pm and shows the same, raw footage in the video above, starting at 20:02 of the video



4. In total it is estimated that 20 to 30 Pepperball rounds were launched into the tunnel. When first deployed they are launched through the heads of officers, directly into the heads of the protesters on the other side of the shield wall.

Unlawful Use of Batons & Shield to Create Stampede

1. Within approximately 15 seconds, officers at the double doors initiated a forceful push of the protesters out of the tunnel – most likely fueled by the blow-back of the rapid-fire pepperball



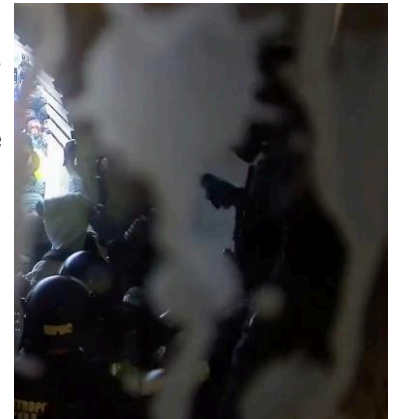
launcher in (1) Video above – the end of this clip shows police officers without gas masks pushing and running out of the tunnel area because they cannot breathe.

2. Almost immediately (within 20 seconds) on the protestor side of things, as seen in the video of (2) above, law enforcement is pushing as hard as they can against the protesters while some protesters (including Rosanne Boyland and Philip Anderson) fall to the ground, disappear from sight, and are not seen again for nearly 5 to 6 minutes later when they are seen at the mouth of the tunnel, unconscious.

OC spray Unlawfully Deployed in Direct Violation of use of force Guidelines

1. **1st OC spray Unlawfully Dousing the Crowd.** At approximately 4:20:17pm you can see the first large burst of OC spray cloud being sprayed from the double-doors into the protesters being pushed back out of the tunnel.

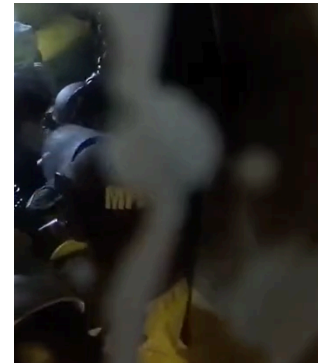
https://youtu.be/2BRcoP3klzs?si=HV14Ihm60_VZ2xmf&t=1217



2. **2nd OC spray Unlawfully Dousing the Crowd**

At approximately 4:23:07pm you can see an MPD Officer climb up onto the right ledge from the rear where they begin to repeatedly shake and deploy what appears to be a personal pepper spray device indiscriminately into the crowd (4:23:27pm).

https://youtu.be/2BRcoP3klzs?si=oyb8Gr2oLfU_PMtE&t=1387



3. **3rd OC spray Unlawfully Dousing the Crowd**

He continues to do this until approximately 4:23:55pm when another officer in a Yellow Jacket arrives at the back of the line in the lower-right view of the camera, gets the OC spray officer's attention, and appears to give him a new bottle of OC spray.

<https://youtu.be/2BRcoP3klzs?si=BwjHuzGGYZ5mRph4&t=1436>

This officer then proceeds to both discriminately and indiscriminately shake and deploy this pepper spray device for the next couple of minutes when it appears to be emptied at 4:25:30pm.

4. **4th OC spray Unlawfully Dousing the Crowd**

At 4:25:40pm in the tunnel video camera footage you see another officer in a yellow jacket reach his arm out to the left, grab something from another officer, and then pass it up to the OC spray



officer on the ledge...who then, as before, repeatedly shakes and deploys the contents until it is emptied.

<https://youtu.be/2BRcoP3klzs?si=X8kKNALRwiBCV78S&t=1539>

5. 5th OC spray Unlawfully Dousing the Crowd

At 4:26:24pm you now see other officers begin to join in – spraying their pepper spray to the mouth of the tunnel. This is where protesters such as Rosanne Boyland and Philip Anderson remain unconscious under the pile of protesters.

<https://youtu.be/2BRcoP3klzs?si=StpgWf5d6Th6rDlb&t=1584>

This continues until after 4:27:17pm when the crowd gets agitated once they see protesters like Rosanne Boyland and Philip Anderson laying unconscious (Philip Anderson is pulled out from underneath Rosanne Boyland by Edward “Jake” Lang at approximately 4:27:03pm).

6. 6th OC spray Unlawfully Dousing the Crowd

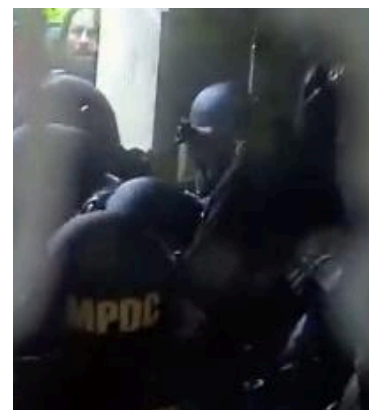
At 4:27:12pm it appears the OC spray officer up on the ledge to the right in the corner has emptied that OC spray canister and is asking for more.

<https://youtu.be/2BRcoP3klzs?si=8UO-7H0zIK9I9UPU&t=1629>

At approximately 4:27:17pm you see a red canister (MK-9) being passed from the back to the OC spray officer on the right ledge who then begins to shake and deploy it until that, too, is empty. This is all happening while Lila Morris is beating an unconscious Rosanne Boyland lying motionless at the edge of the tunnel. This continues until approximately 4:28:20pm. During this time OC spray can be seen being deployed from at least 4 different officers right near the mouth of the tunnel.

7. 7th OC spray Unlawfully Dousing the Crowd

At 4:28:24pm an officer down below reaches up to pass another canister of OC spray to the OC spray officer on the ledge. This canister is stainless steel in color and different from the other canisters already deployed by OC spray Officer on the right ledge.



<https://youtu.be/2BRcoP3klzs?si=cofL5TRazvQajMA6&t=1700>

This continues until approximately 4:28:40pm....while OC spray can be seen being deployed from at least 4 different officers right near the mouth of the tunnel. One thing you will notice is the OC spray discharged from this canister is yellowish in color, and streams with a large cloud that covers everything below it in a massive cover. The contents of this canister may constitute tear gas, which is much worse than pepper spray and can be considered LETHAL when deployed in this manner.



8. 8th OC sprayed Unlawfully and Directly into Protestor Face at Full Strength

At approximately 4:29:39pm OC spray officer on the right ledge lets loose a direct steady stream directly into the face of Protestor with no gas mask on who is trying to get law enforcement to stop. This violates every single use of force policy or order as this kind of stream from this kind of canister from this distance is considered LETHAL!



<https://youtu.be/2BRcoP3klzs?si=oDN4mKrHsjOEbwAh&t=1787>

This continues from 4 different officers until a group approaches the front of the tunnel with Rosanne Boyland's body to turn her over to Law Enforcement officers for immediate medical attention at approximately 4:31:00pm. At approximately 4:31:07pm Rosanne Boyland's unconscious body can be seen being dragged by police through the tunnel to receive medical attention.

9. 9th tear gas Chemical Sprayed Unlawfully and Directly into Protestor Face at Full Strength

After Rosanne Boyland is back in the tunnel area getting medical attention, at approximately 4:31:30pm the OC spray officer on the right ledge is once again seen spraying a full stream directly into the face of a maskless protestor who is yelling at police in the front, after having witnessed everything regarding Rosanne Boyland.



<https://youtu.be/2BRcoP3klzs?si=IltRQqA7NhtEPEIC&t=1886>

This last blast works up the protesters into an absolute frenzy, with many of the protesters that helped administer CPR to Rosanne Boyland growing more irate and begin throwing things into the tunnel at the law enforcement officers. It is not until approximately 4:33:45pm that the OC spray officer on the right ledge fully empties his canister and retreats from the right ledge to the rear of the tunnel.



Lila Morris Assault on Rosanne Boyland

Between the time of 16:27:00 and 16:28:00 on January 6, 2021, MPD Officer Lila Morris (Badge No. 5869) struck the unconscious, unresponsive body of Rosanne Marie Boyland with 3 vicious and malicious strikes with a walking stick that she picked up off the ground laying right beside Rosanne's body. These strikes were delivered deliberately, callously, and with zero concern for human life. More importantly, these were delivered while Lila Morris had her department-issued baton hanging from her service belt – in direct violation of MPD use of force policy.

Tunnel Viewpoint as Shown by MPD Officers BWC

The information below shows frame-by-frame stills taken from MPD BWC (Body-Worn Camera) footage, to include Lila Morris' very own. These frame-by-frame stills are presented chronologically, complete with date-stamp and time-stamp information for verification purposes. The sources of these BWC video can be found using the following information:

Name	BWC ID#	Badge
Lila Morris	X6039BHJI	#5869
Carter Moore	X6039BF8M	#5229
Andrew Wayte	X6039BJJV	#5737

In addition, to give great context and perspective of this 1 minute of time, three other protestor-vantage point videos are provided from the outside looking in at the scene as it unfolds. These screenshots show the exact same actions and bring it all into focus as to what truly transpired at the Lower West Terrace tunnel that day to Rosanne Boyland, one of the 4 protestor deaths that occurred on January 6, 2021.

To this day, Lila Morris has not been investigated, nor has the MPD been held accountable for clear violations of their very own “use of force” Policies. Within those “use of force” policies, the walking stick that Lila Morris picked up and used as a weapon – even when her own department-issued baton was hanging from her waist belt – is clearly regarded as a direct violation of Section L(4)h of the MPD's GO-HSC-801.01 – Crowd Management and Civil Unrest POLICY which states “Members shall not carry or use unauthorized tools or weapons.”



Peaceful protestor Rosanne Boyland and the J6 police officer that brutally beat her with a stick before she died.



The screenshots in the following sections are taken from Lila Morris's own BWC (X6039BHJ1) which can be viewed here: <https://youtu.be/eb7S5dZtw4>

16:27:49 – Lila Morris's own BWC shows her standing behind a protester at the Lower East Terrace tunnel entrance looking out. Here a walking stick can be seen falling to the ground on the left side.



16:27:51 – As Lila Morris bends to retrieve and pick up the walking stick, her BWC captures the scene below from her Point of View. We see the prone body of Rosanne Boyland laying on her right side facing away from the entrance of the tunnel. Rosanne is clearly unresponsive, in clear distress, with her left hand outstretched over her head with palm facing up in an awkward manner. More importantly, the fingers in her hand have started turning blue indicating that her body has been in a state of oxygen deprivation for an extended time already. In the video multiple protesters nearby, including Justin Winchell (teal sleeve pictured reaching from around the front right corner), who is Rosanne's life-long friend who accompanied her that day from Georgia.



16:27:52 – One second later, Lila Morris lifts the stick in front of her just as Luke Coffee approaches with his arm in the air calling for law enforcement to “STOP!” “STOP!” “STOP!”



16:27:53 - Lila Morris begins to raise the stick with her left hand and on the way up brings her right hand to the stick to raise the stick over her head in an axe-chopping motion in preparation to deliver Strike#1 to Luke Coffee



16:27:53 – Lila Morris brings down the stick, after winding up, with both hands in front of her with all of her might to deliver a full-force, fierce blow.



16:27:53 – Strike#1 from Lila Morris strikes Luke Coffee, standing in a purely defensive posture, on the forearm.



16:27:54 – As Lila Morris begins to lift the stick back up in preparation for Strike #2, Luke Coffee reaches out with his hand while screaming "Stop!"



16:27:54 – Once again Lila Morris brings the stick up with both hands above her head in an axe-chopping kind of motion.



16:27:54 – Lila Morris initiates Strike #2 with a downward swing with all of her might in an axe-chopping motion beside Luke Coffee who has begun to turn his body to avoid the strike.



16:27:54 – Strike #2 continues to go down beside Luke Coffee in the direction of an unconscious Rosanne Boyland lying on her side in front of Lila Morris, striking her in her stomach.



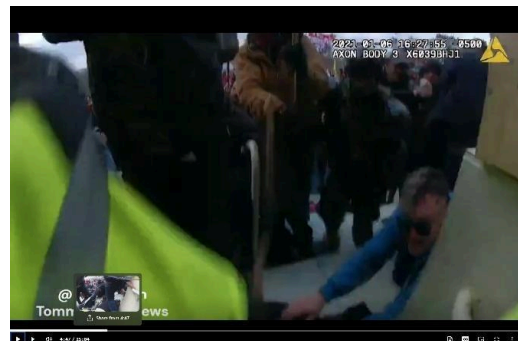
16:27:54 – Again, Lila Morris brings the stick back up above her head in an axe-chopping motion in preparation for delivering another downward blow, Strike #3.



16:27:54 – After the overheard wind-up, Lila Morris now begins to bring the stick downward in front of her, gripping it with both hands, to deliver Strike #3



16:27:55 – Strike #3 from Lila Morris comes down with full-force onto a defenseless Rosanne Boyland as the stick disappears from camera view. Other camera angles capture this strike landing directly on Rosanne Boyland's midsection and visibly moves her body as Justin Winchell, Rosanne Boyland's lifelong friend who accompanied her that day, is looking on screaming at the top of his lungs to get help for Rosanne.



16:27:55 – When the stick reappears in camera view, Lila Morris is once again bringing it back down from an overhead motion, this time with her left hand while her right hand appears to be on the wall beside her, to deliver Strike #4.



16:27:55 – Lila Morris delivers with her left hand Strike #4, which lands directly on Rosanne Boyland's head area with such force as to move her hand (as seen in other angles).



16:27:56 – Lila Morris then lifts the stick up with her left hand while her right hand is supporting her weight against the wall to her right, in preparation for a Strike #5.



16:27:56 – As is seen in other videos, Lila Morris brings her right hand down for Strike #5, but midway down the walking stick strikes a long pole from a protester and flies out of her hand into the arch above. In the aftermath of this, Lila Morris then crouches near the wall on the right side of the tunnel.



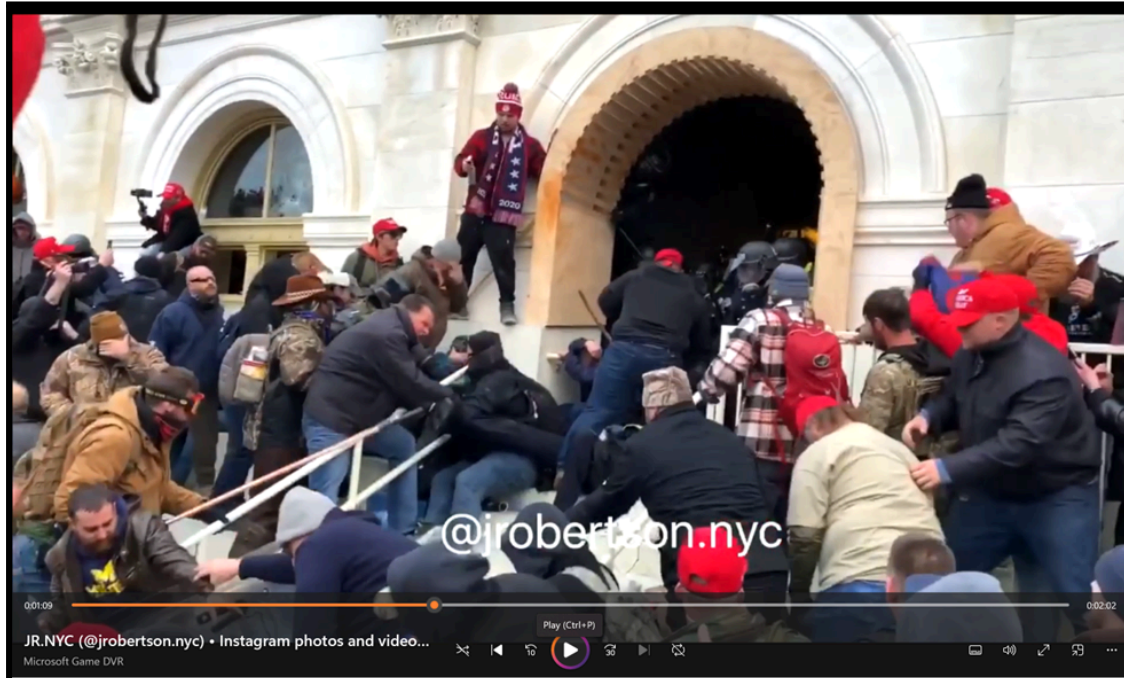
In total, Lila Morris attempts 5 total strikes, landing one on the elbow of Luke Coffee, 3 landing on the stomach, shoulders, and head of Rosanne Boyland, with the 5th strike not being completed because a protestor stick or pipe made contact with the Walking Stick and sending it flying out of Lila Morris hands. Each of these blows to Rosanne Boyland by Lila Morris was delivered with viciousness and malice, seemingly out of frustration, exasperation, and desperation.



Protestor Viewpoint - Video Captured by J. Robertson of NYC

The following is a screenshot-by-screenshot of the Lila Morris assault on Rosanne Boyland from the outside/protester perspective. This gives far more context than the previous sections which shows the assault from inside the tunnel using BWC footage from MPD Officers on the front line at the entrance of the tunnel.

To watch this video in its entirety, click [HERE!](#) The screenshots within this section are taken frame-by-frame from timestamp 1:10 through 1:20 of this video.

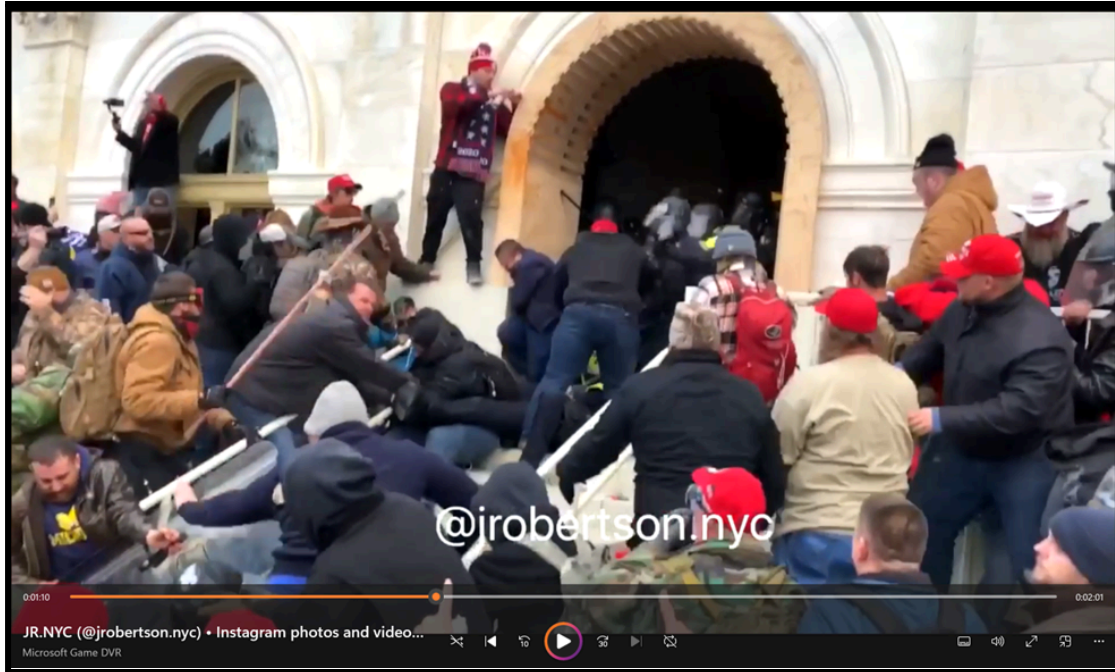


SCREENSHOT #001

Setting the Stage

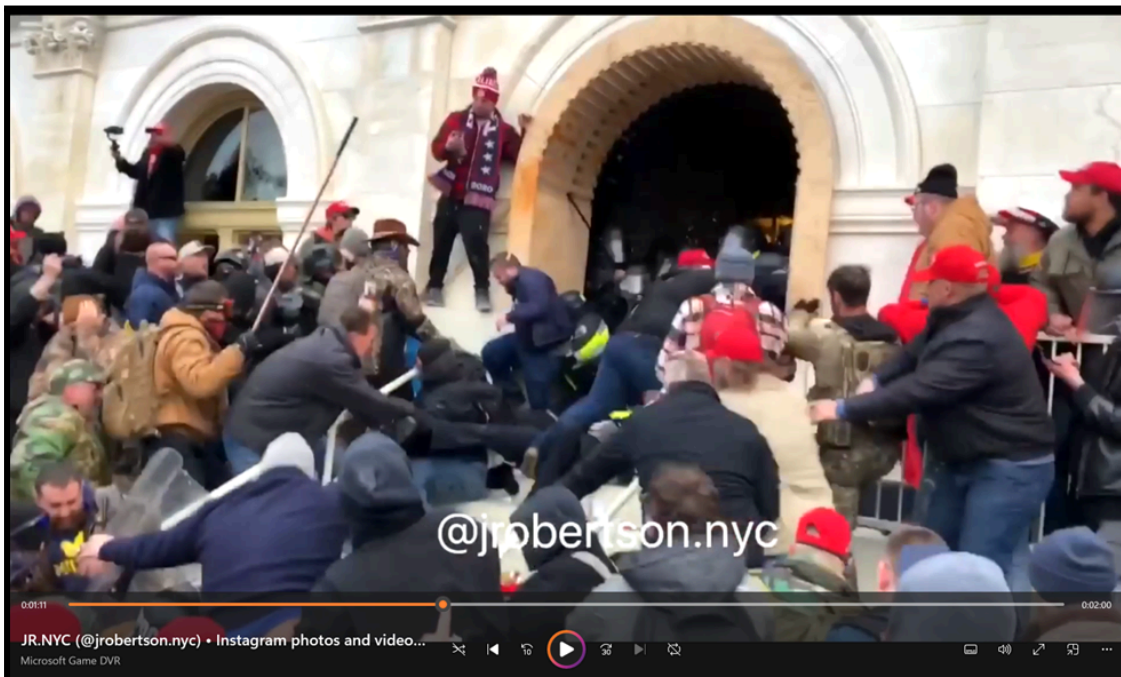
Stick is visible resting against the side of the Arch Doorway to the left of Ronald McAbee. Luke Coffee in the Brown Cowboy hat is seen climbing the stairs and about to approach the front line in front of Lila Morris who is directly in front of Ronald McAbee at this point.





SCREENSHOT #002

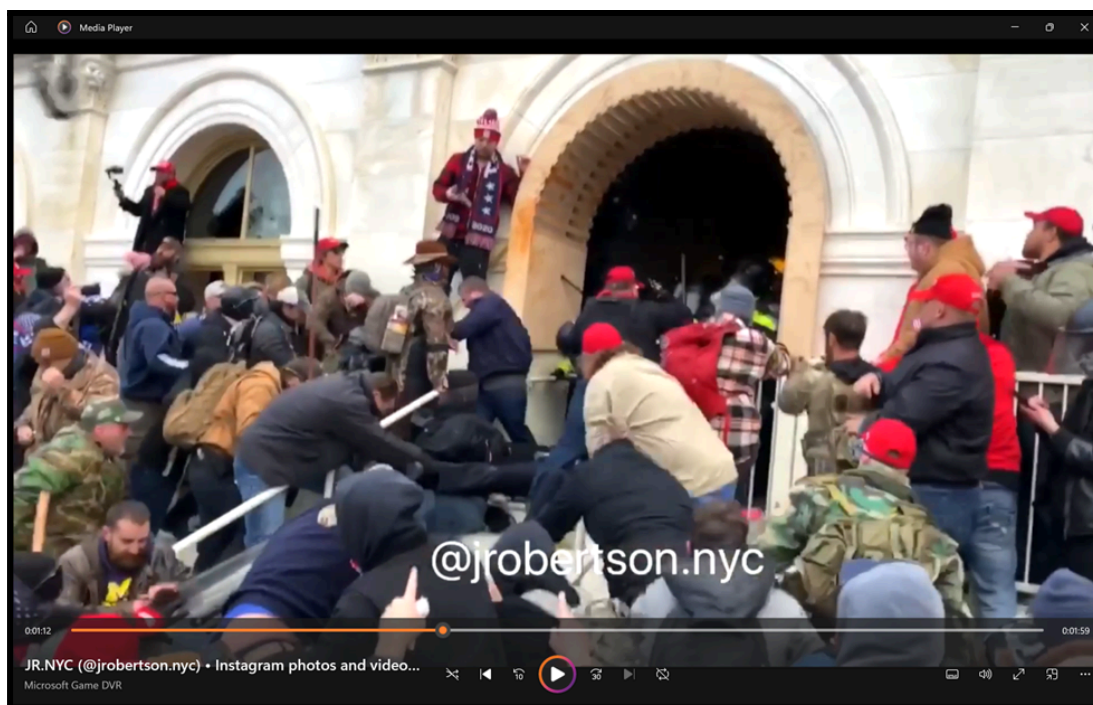
There is now a gentleman leaving the tunnel around the left corner of the arch entrance door.



SCREENSHOT #003

Once he leaves, Lila Morris will be seen leaning over to pick up the stick from where it has fallen beside an unconscious Rosanne Boyland – simultaneously while Luke Coffee steps in front.





SCREENSHOT #004

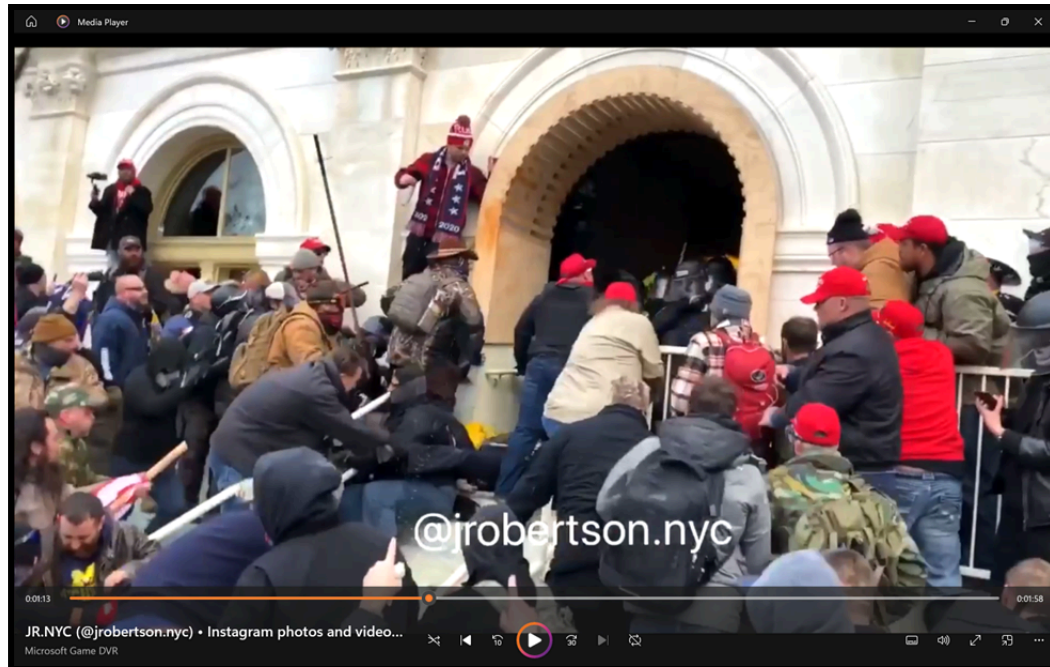
This is the point where Lila Morris begins to reach down to grab the stick.



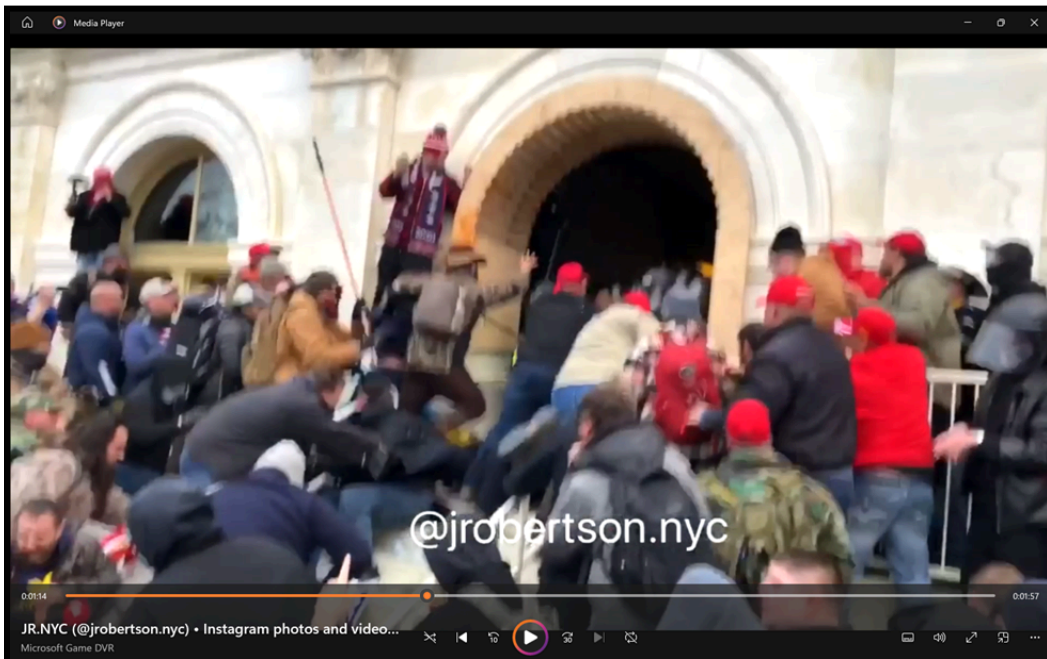
SCREENSHOT #005

Luke Coffee is now at the top of the stairs.



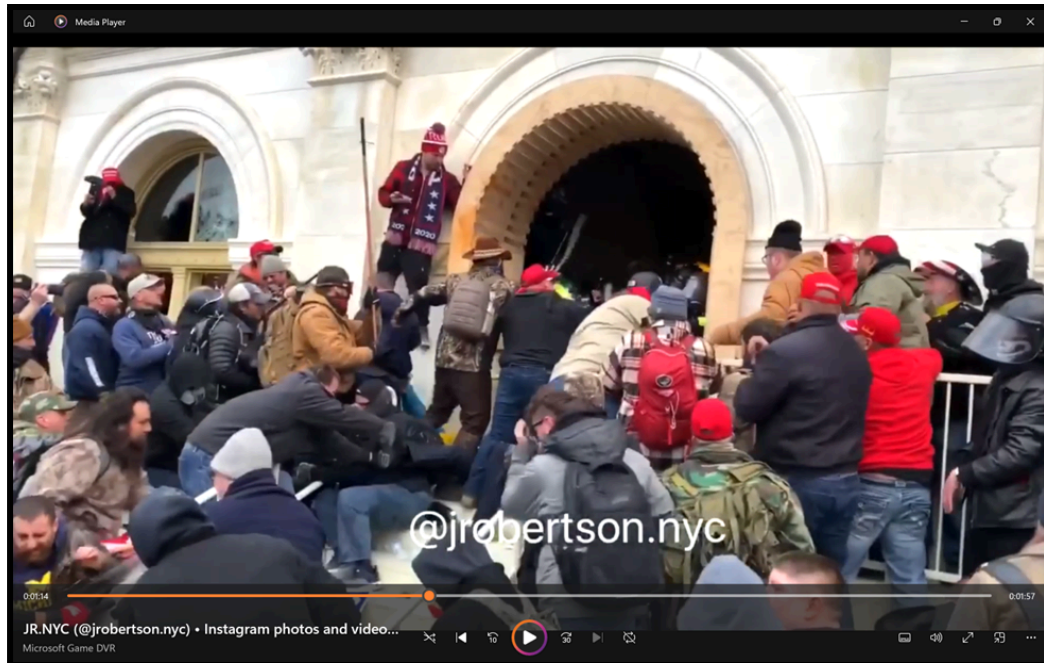
**SCREENSHOT #006**

Now you can see the body of Rosanne Boyland with a black sweatshirt...her hand resting on the top step – all of this below the yellow just under the handrail. Luke Coffee is walking closer to where Lila Morris is bent over in front of Ronald McAbee retrieving the stick.

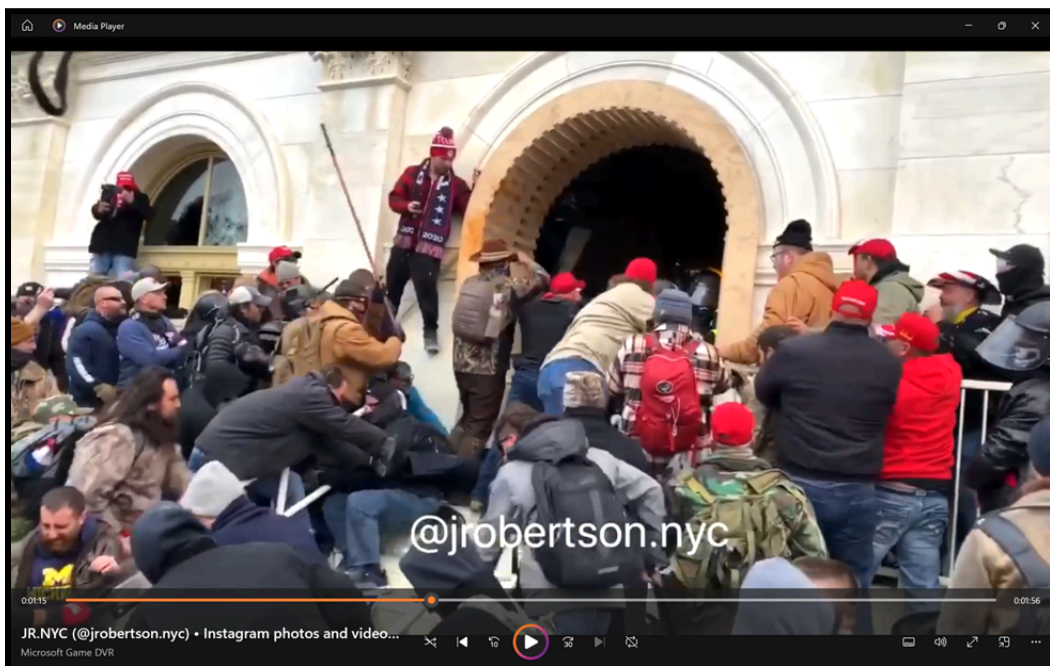
**SCREENSHOT #007**

In this screenshot you can see Lila Morris raising the stick as Luke Coffee approaches to intervene.



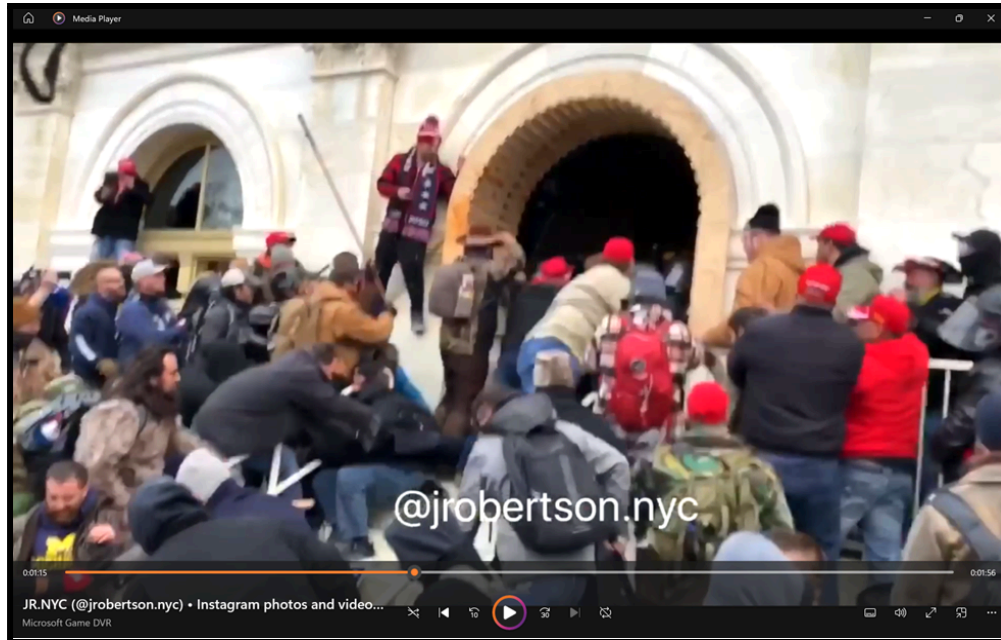
**SCREENSHOT #008**

Here Lila Morris has begun to raise the stick over her head with both hands on the stick. This is the Windup for Strike #1 on an unconscious Rosanne Boyland.

**SCREENSHOT #009**

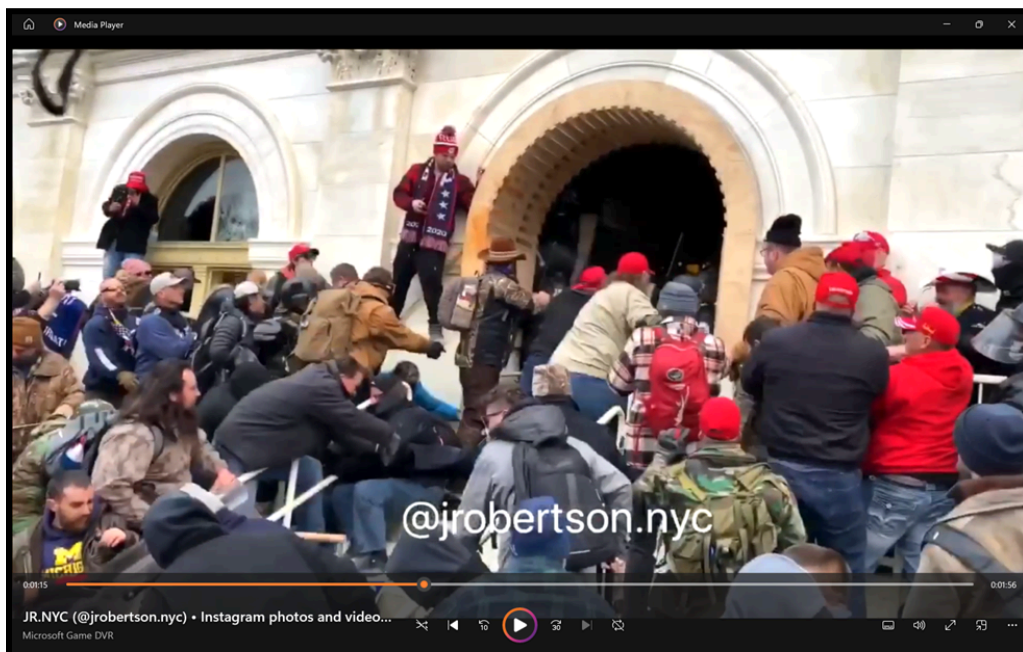
This screenshot is the downward swing of Strike #1 – Lila Morris has both hands on the stick, raised it over her head, and is coming down in an axe-chopping kind of motion with all of her might.





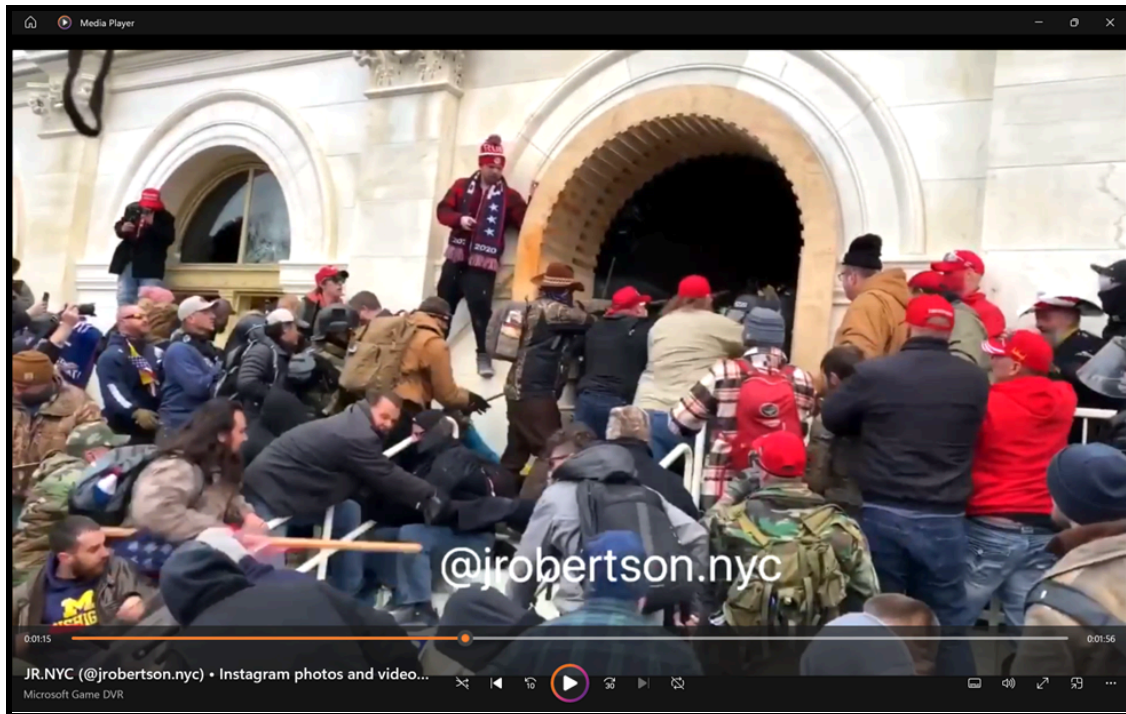
SCREENSHOT #010

The strike directed at an unconscious Rosanne Boyland, instead hits Luke Coffee on his elbow and glances off to the side.



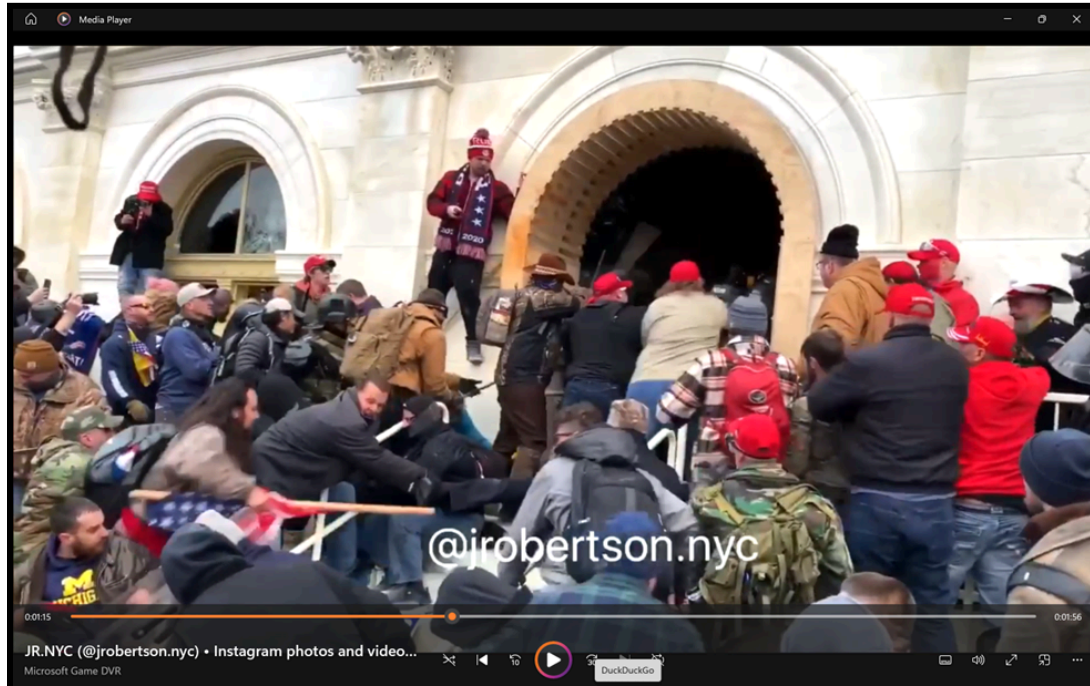
SCREENSHOT #011

Lila Morris now raises it back over her head to prepare for Strike #2 on Rosanne Boyland's unconscious body.



SCREENSHOT #012

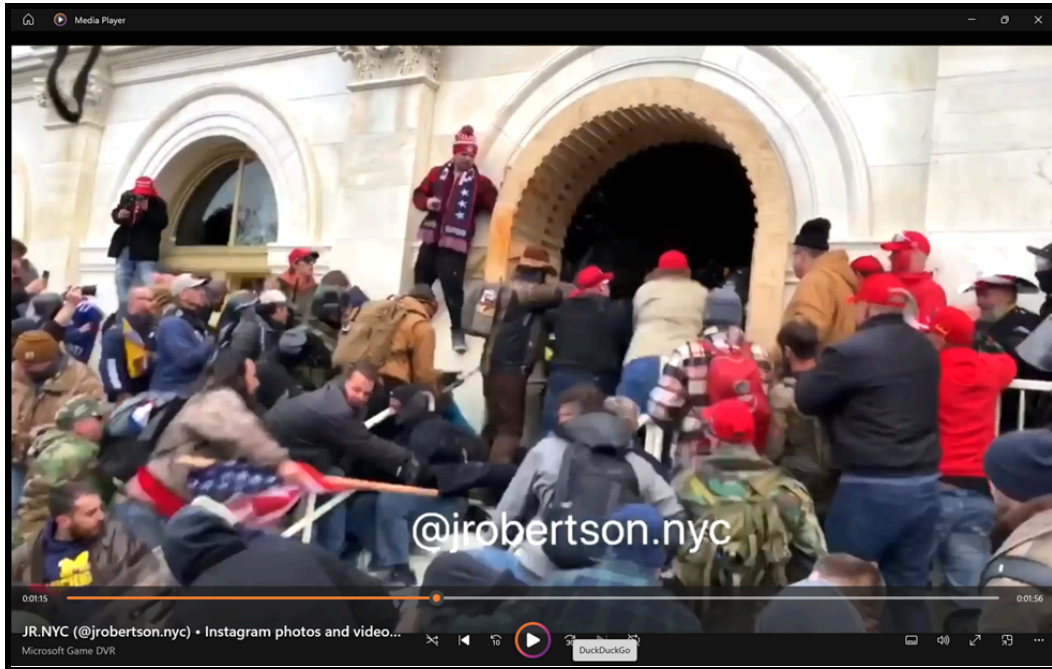
The stick is beginning to come forward for Strike #2 on Rosanne Boyland's unconscious body.



SCREENSHOT #013

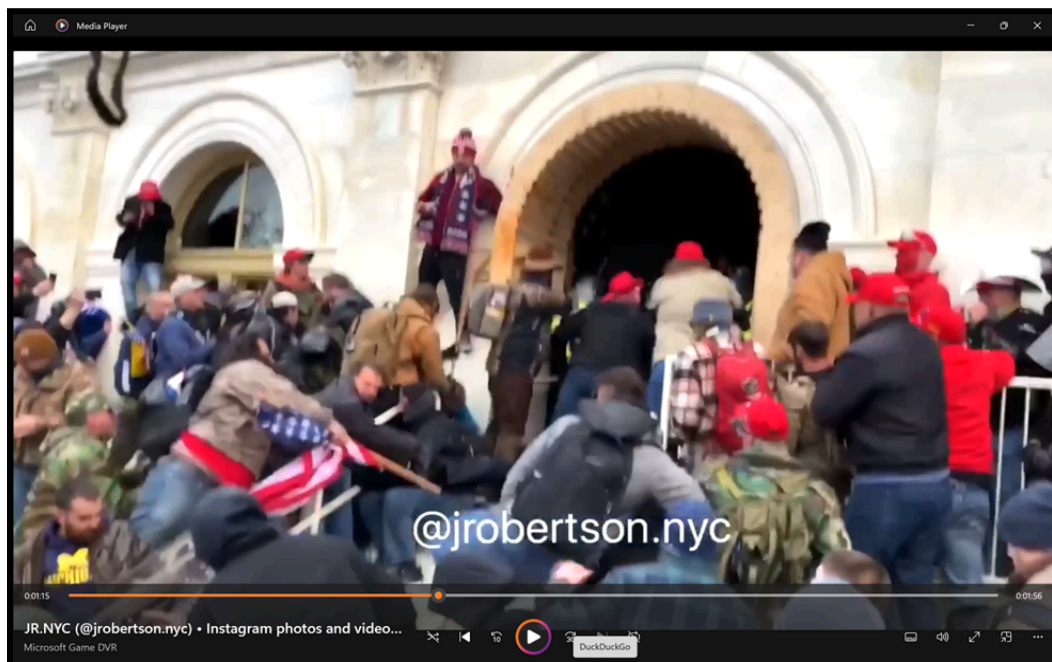
Stick coming forward...





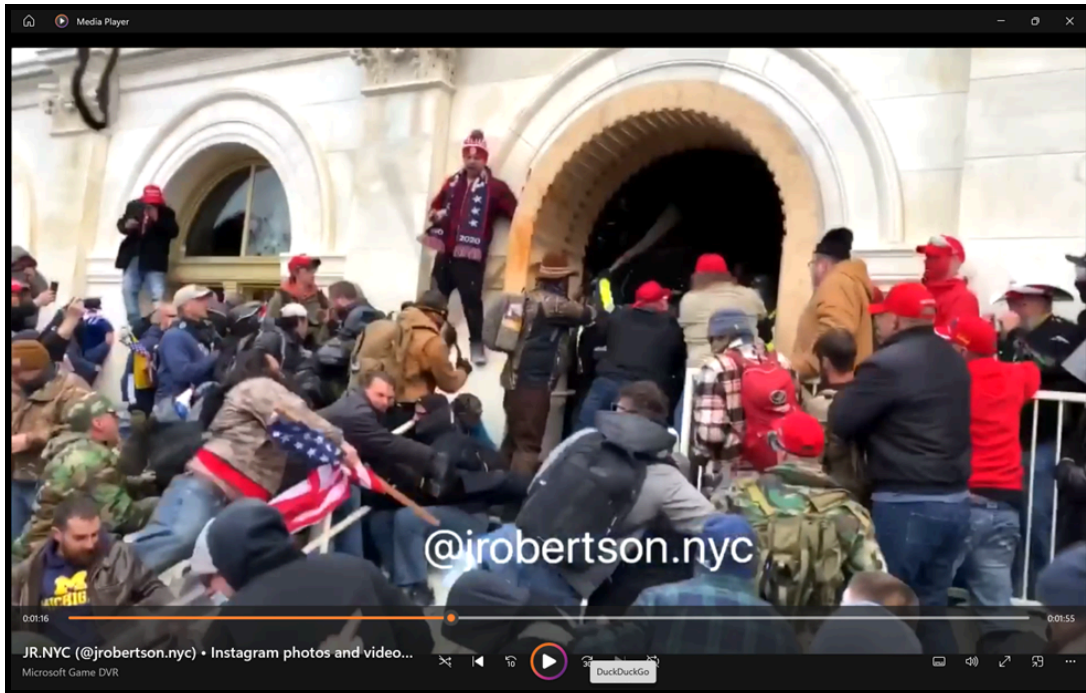
SCREENSHOT #014

Stick striking Rosanne Boyland in the abdomen – the right side of her body as she is laying on her side facing away from the tunnel (can be seen from other camera angles).



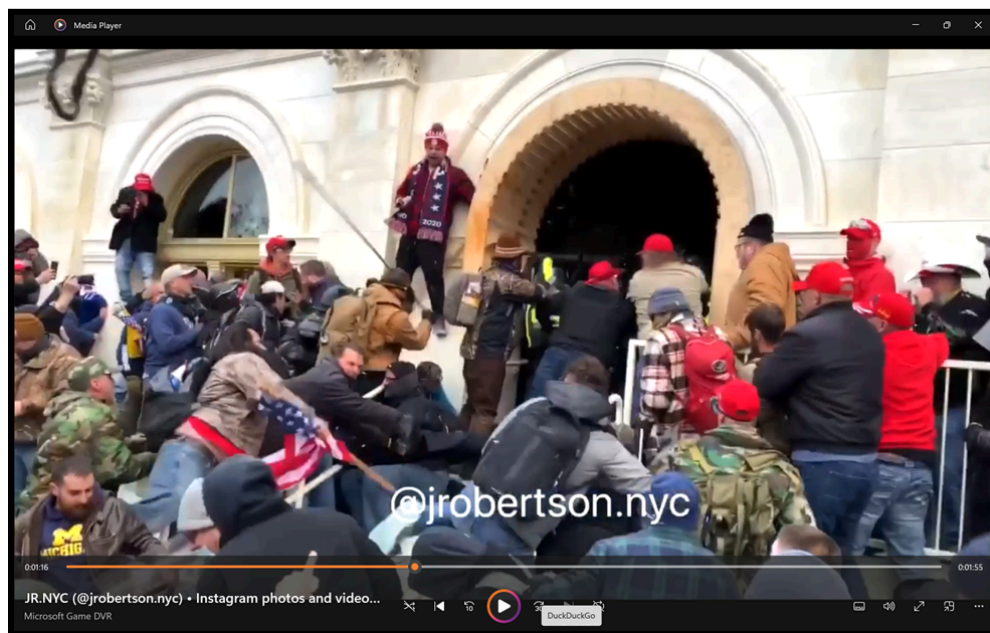
SCREENSHOT #015

Lila Morris is bringing the stick back up in preparation for Strike #3 on the unconscious body of Rosanne Boyland.



SCREENSHOT #016

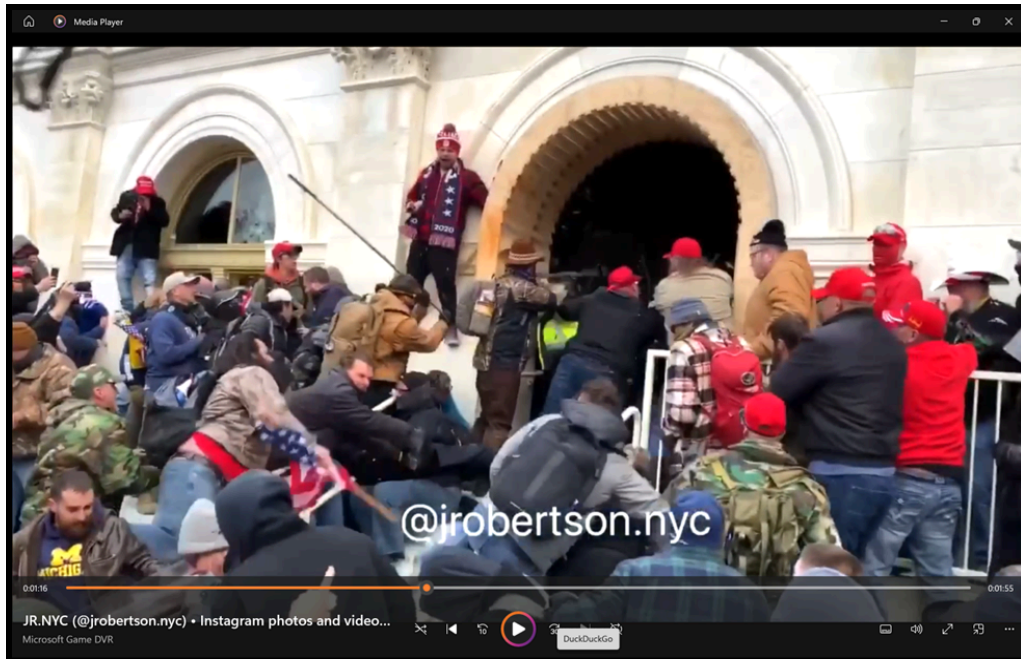
Here you can clearly see her bring the stick over her head with both hands for the wind-up.



SCREENSHOT #017

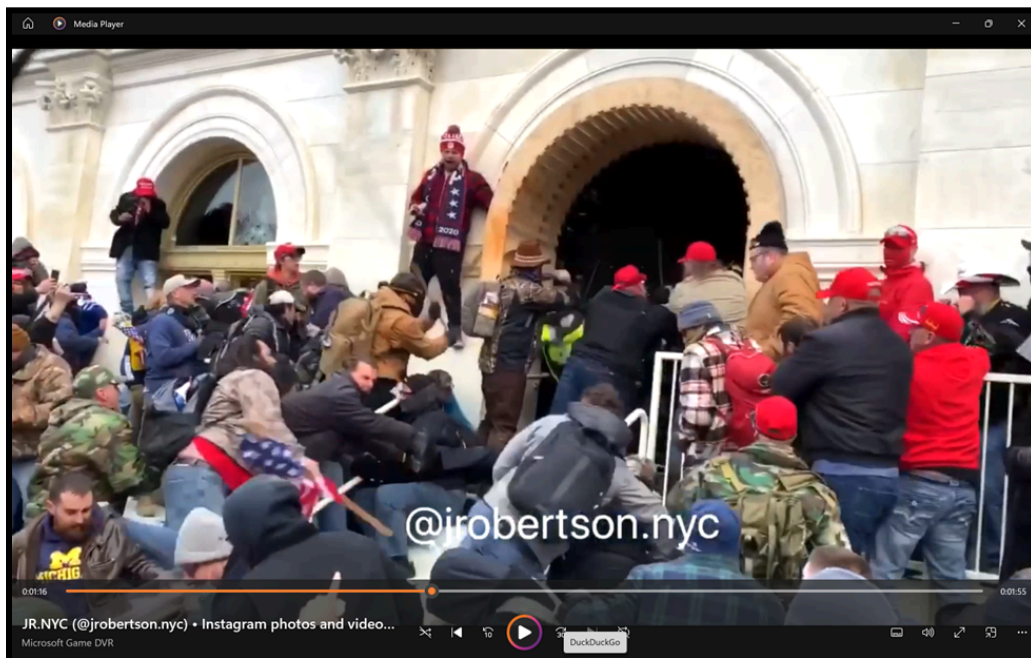
Here the stick is at the top of Lila Morris's back-swing for Strike #3, and you can see she brings the stick parallel to the ground in her wind-up. She is reaching back as far as she can so she can bring it down with all the force and might she can muster.





SCREENSHOT #018

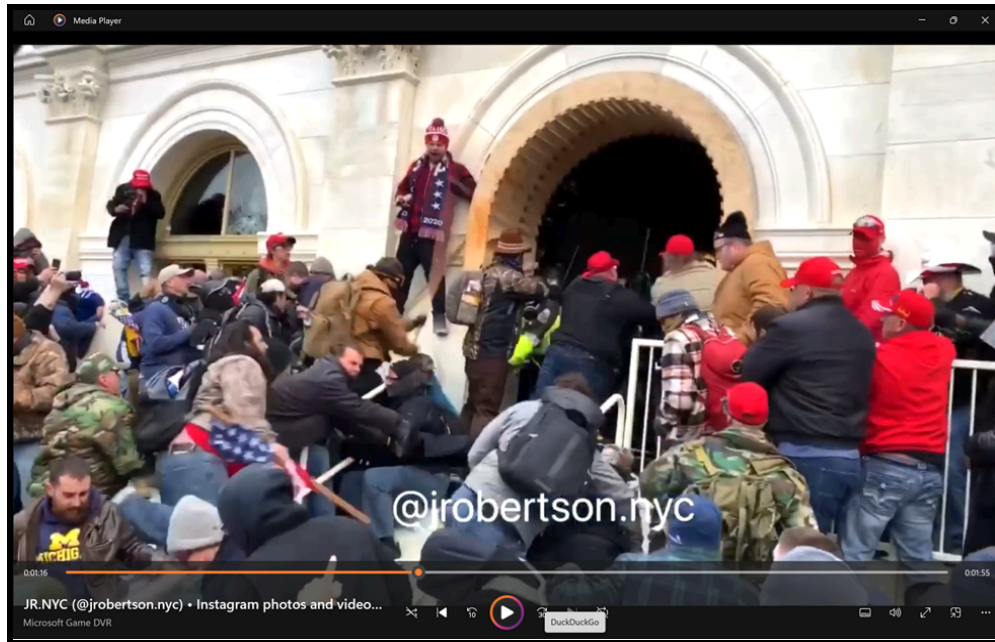
This starts her downswing with the stick coming forward slightly for Strike #3 on the unconscious body of Rosanne Boyland.



SCREENSHOT #019

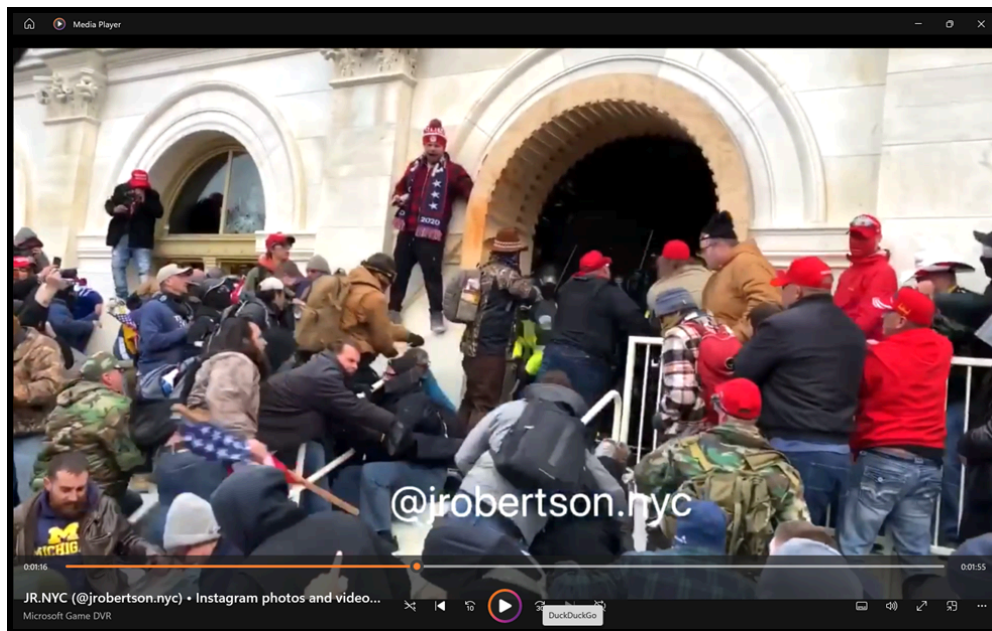
The stick is now mid-swing coming down and about to hit Rosanne Boyland in the head and shoulder area (as can be seen in other video angles).





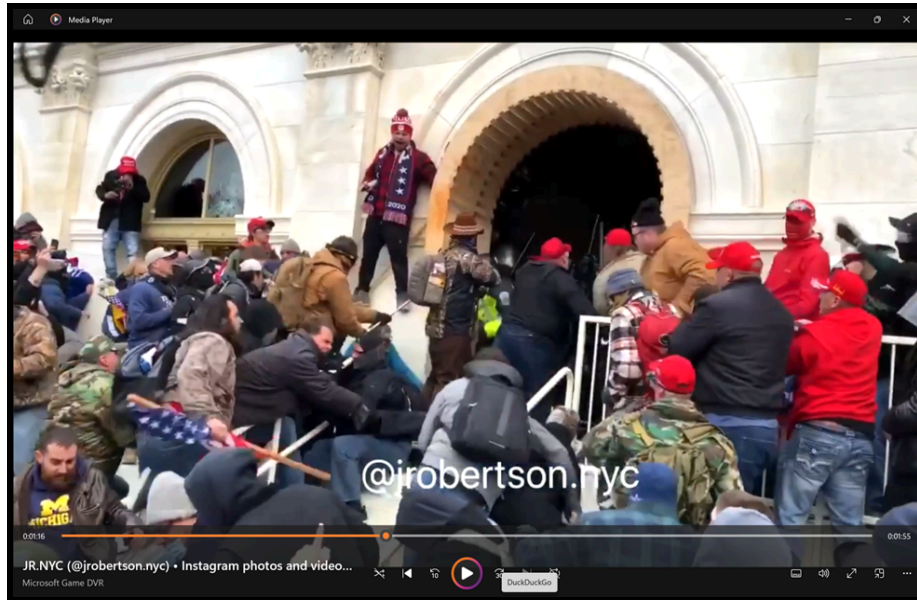
SCREENSHOT #020

Here you can see the full out-stretched arms of Lila Morris as Strike #3 makes contact with Rosanne Boyland's unconscious body.

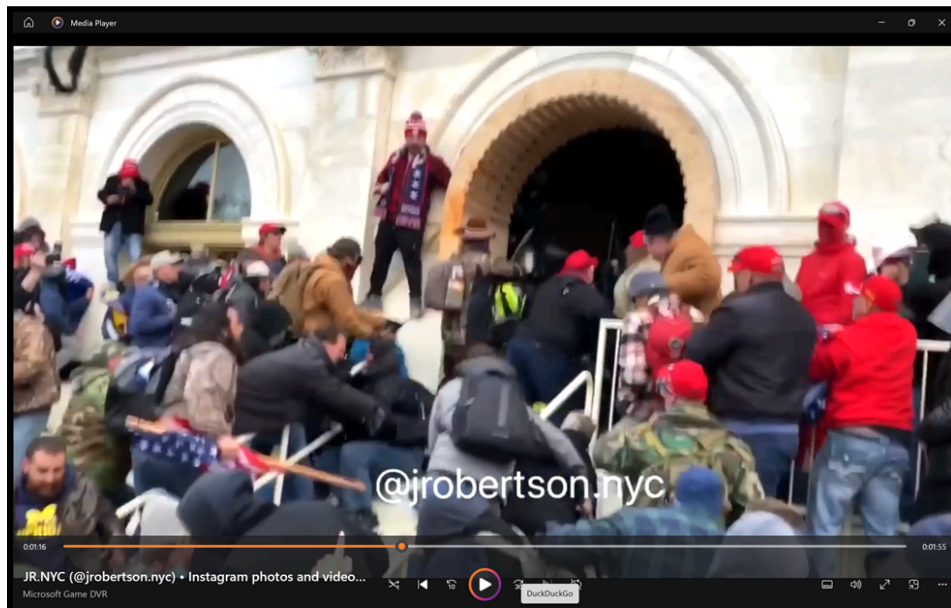


SCREENSHOT #021

Immediately after Strike #3, Lila Morris drops her hands a little to get a better grip and prepares for the upswing to begin the Strike #4 wind-up on the unconscious body of Rosanne Boyland.

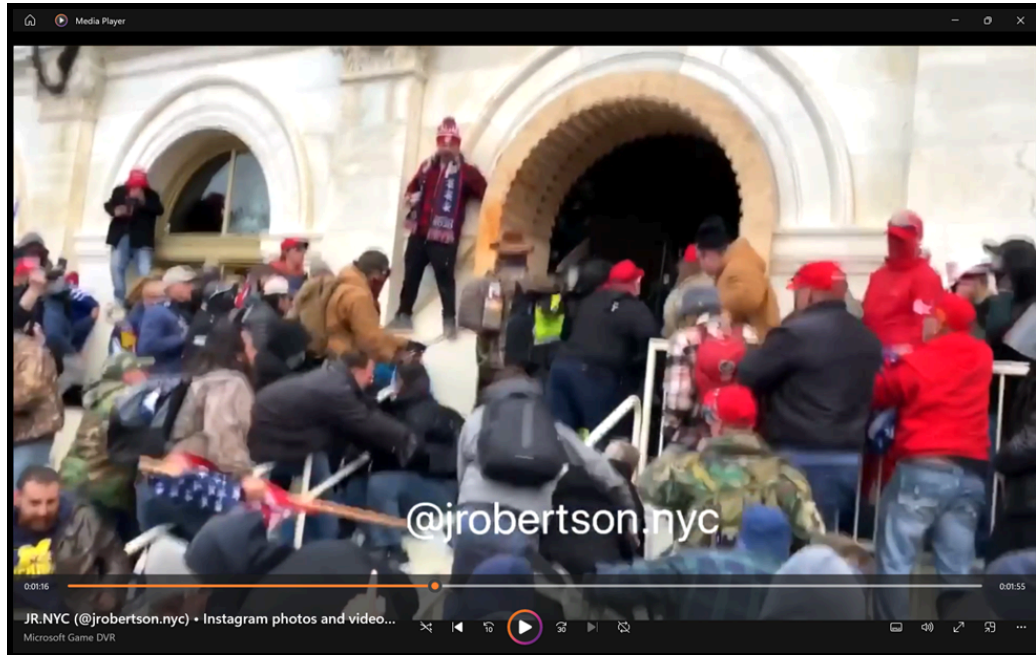
**SCREENSHOT #022**

An individual in dark brown clothing intervenes with a long pipe in apparent common-law defense of a third party to prevent imminent harm to Rosanne Boyland, after which Officer Lila Morris releases her right hand from the stick and raises it overhead with her left hand in a striking posture.

**SCREENSHOT #023**

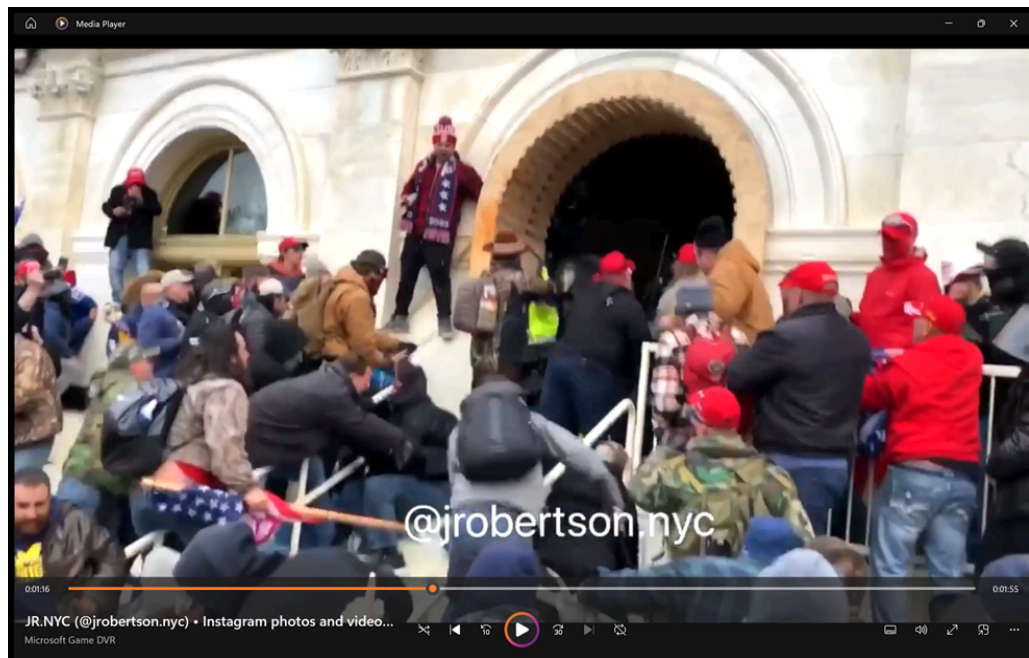
Lila Morris now begins to bring back the stick over her head with her left hand for Strike #4 on Rosanne Boyland's unconscious body.





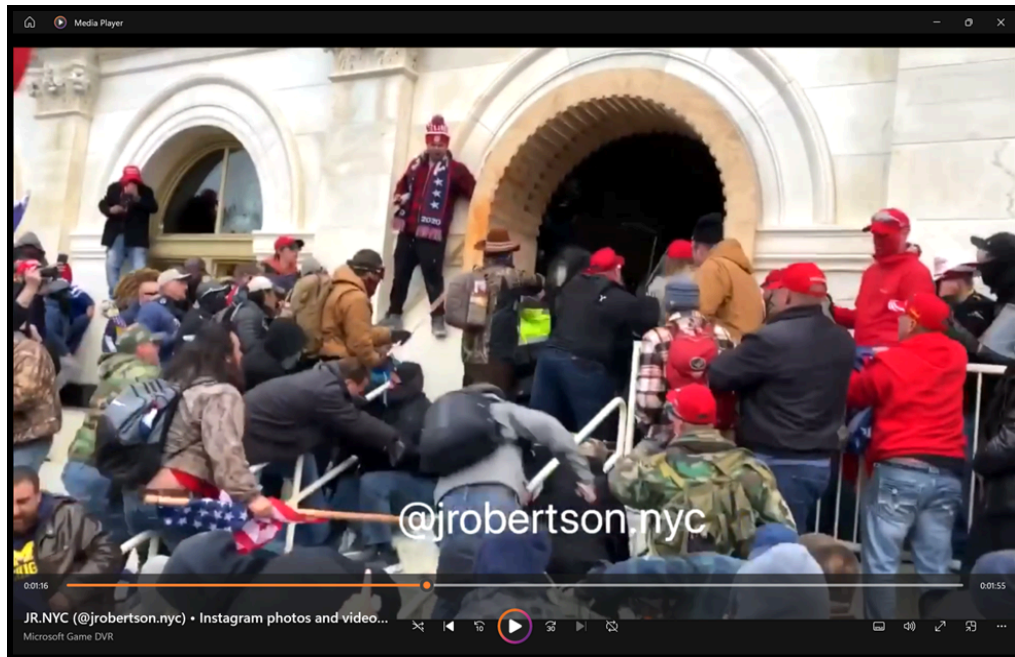
SCREENSHOT #024

The stick is now above Lila Morri's head with one hand and she is about to bring down Strike #4 on Rosanne Boyland's unconscious body.

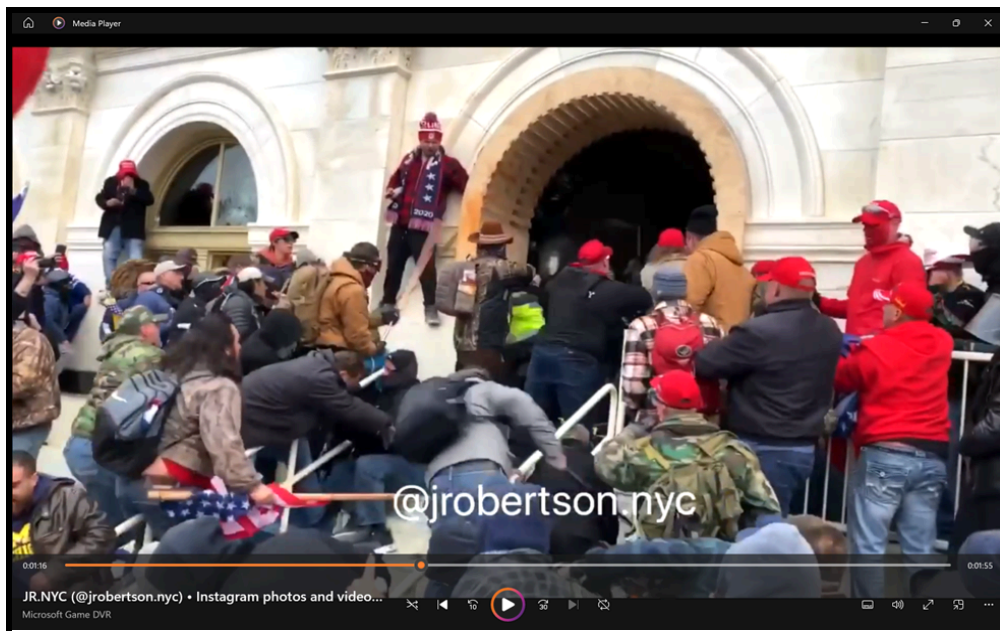


SCREENSHOT #025

She is now beginning to bring down Strike #4 after the one-handed wind-up on Rosanne Boyland's unconscious body.

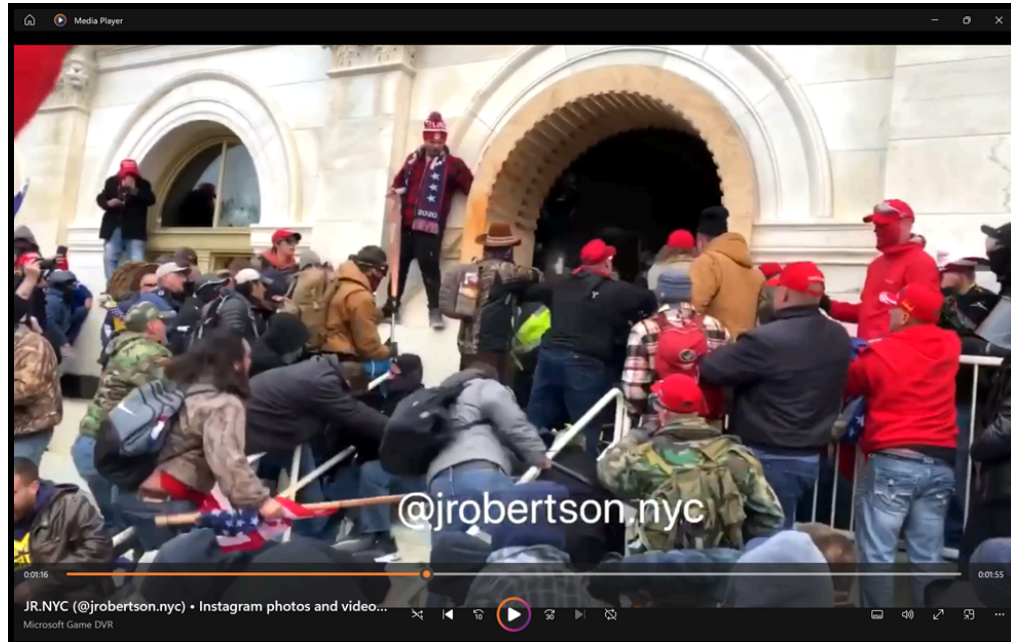
**SCREENSHOT #026**

The stick is now about to strike Rosanne Boyland in the head area as Officer Morris lunges forward with Strike #4 (as can be seen from other camera angles) on Rosanne Boyland's unconscious body.

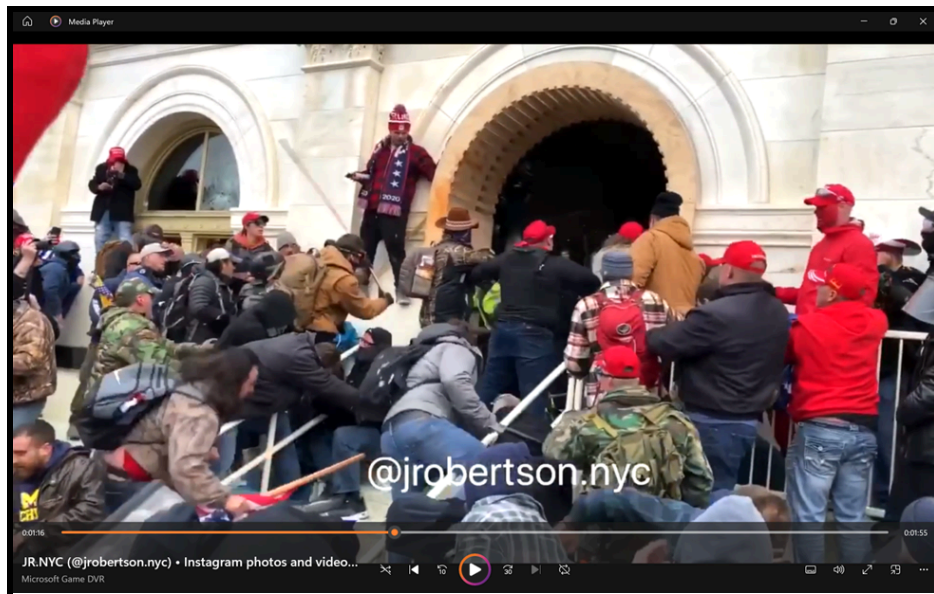
**SCREENSHOT #027**

As Strike #4 begins to make contact with Rosanne Boyland's unconscious body, the brown jacket protestor is raising the pipe, preparing to fend off Lila Morris to defend the unconscious Rosanne Boyland from further strikes.

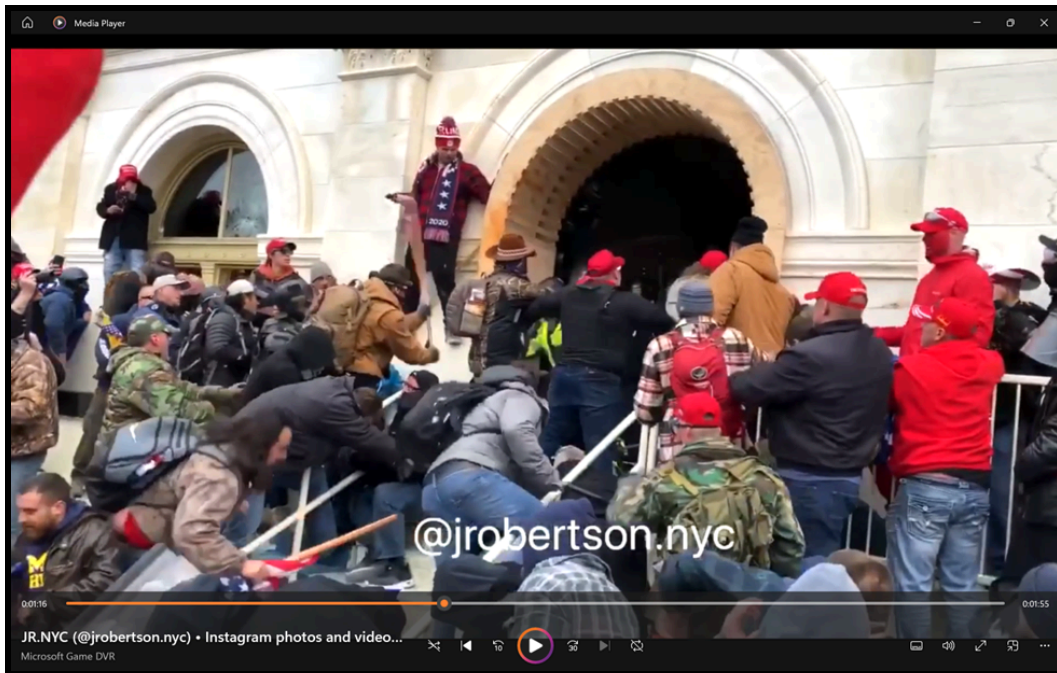


**SCREENSHOT #028**

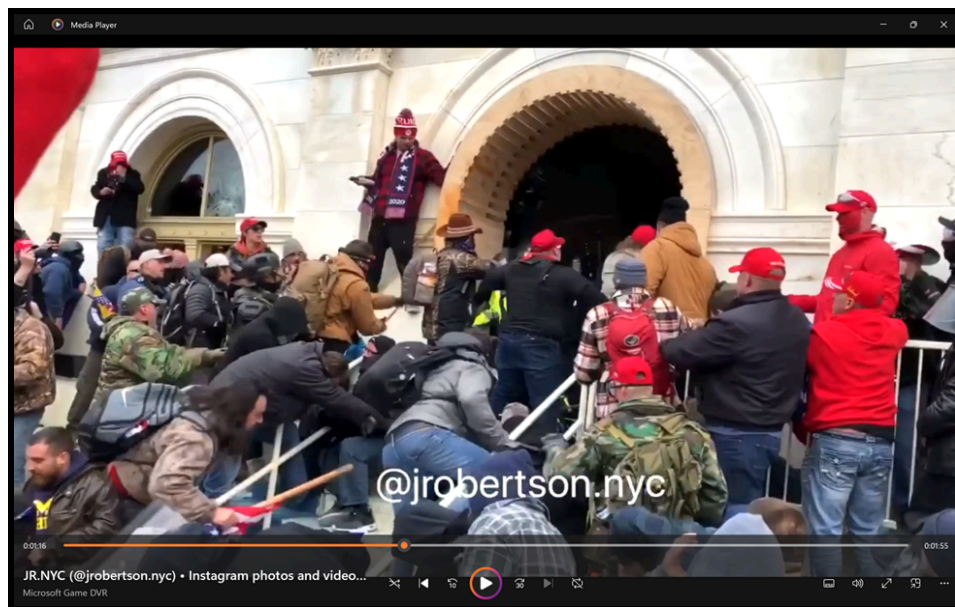
The stick becomes visible just as it is about to strike Rosanne Boyland's unconscious body. Now the brown jacket protester with the pipe is beginning to lift the pipe above his head to defend Rosanne Boyland from further beating by Officer Lila Morris.

**SCREENSHOT #029**

Lila Morris is beginning to bring the stick back up for Strike #5. At the very same time the brown jacket protestor with the long pipe is beginning to bring down the long pipe.

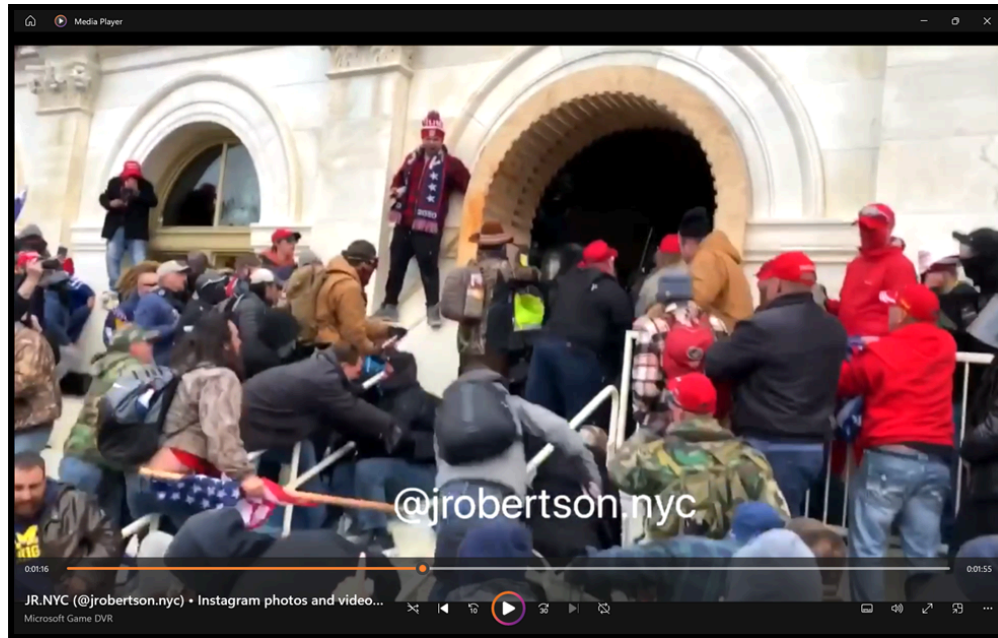
**SCREENSHOT #030**

More of the same: Lila Morris is beginning to bring the stick back up for Strike #5. At the very same time the brown jacket protestor with the long pipe is beginning to bring down the long pipe.

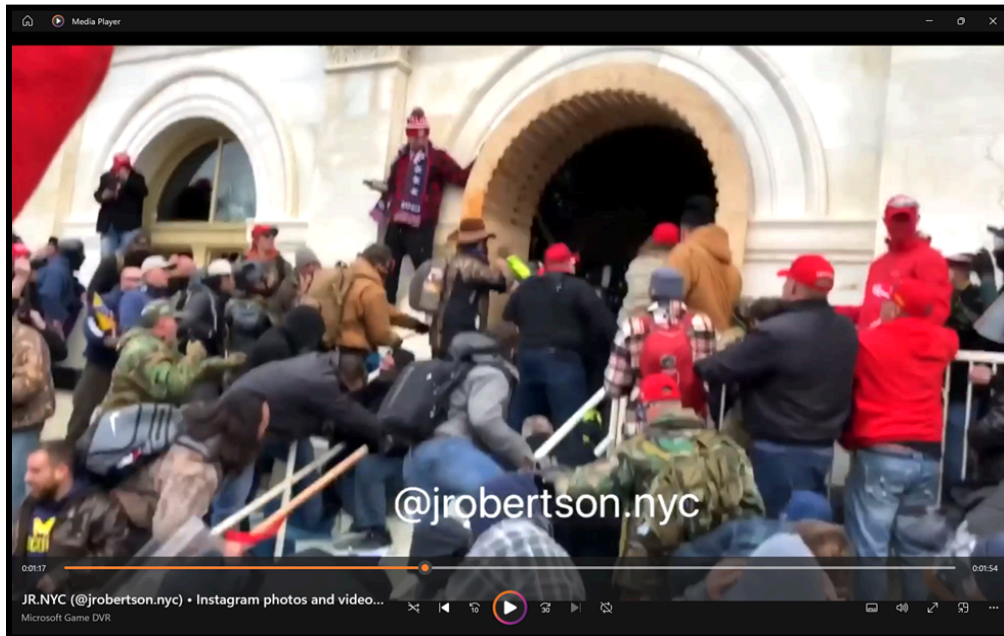
**SCREENSHOT #031**

In this next screenshot you see the brown jacket protestor is bringing down the long pipe in defense of unconscious Rosanne Boyland,, just as Lila Morris begins to stand to begin one-handed wind-up Strike #5.



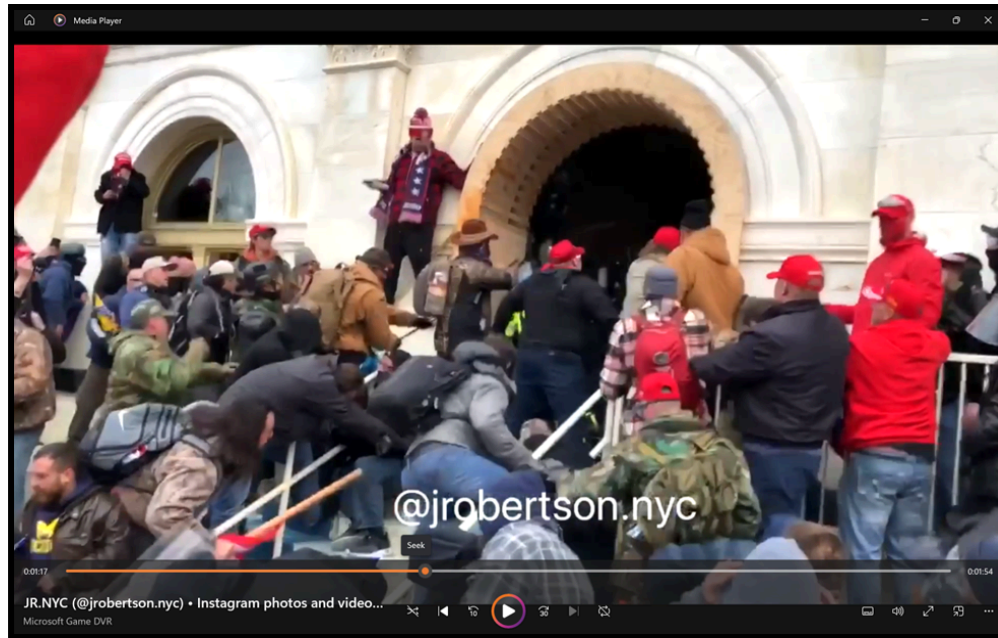
**SCREENSHOT #032**

Here the stick is visible in Lila Morris's hand about to come forward for Strike #5 on the body of Rosanne Boyland. Simultaneously, the brown jacket protestor is about to make contact with Lila Morris with the long pole as he attempts to defend Boyland from further beating..

**SCREENSHOT #033**

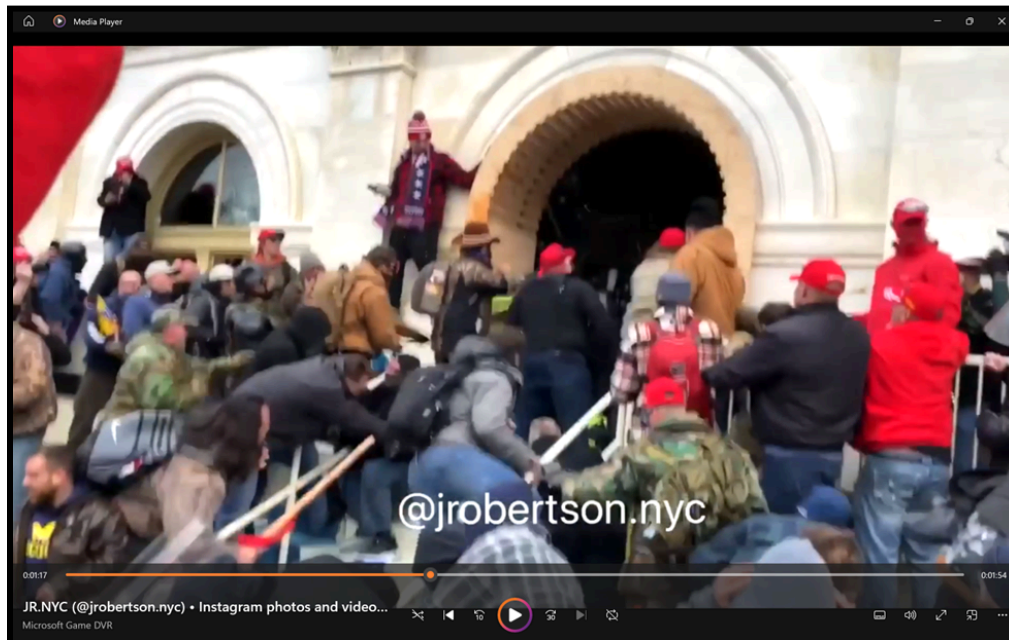
During the downswing of Strike #5 from Lila Morris, the long pole from the brown jacket protestor makes contact with Lila Morris's helmet.





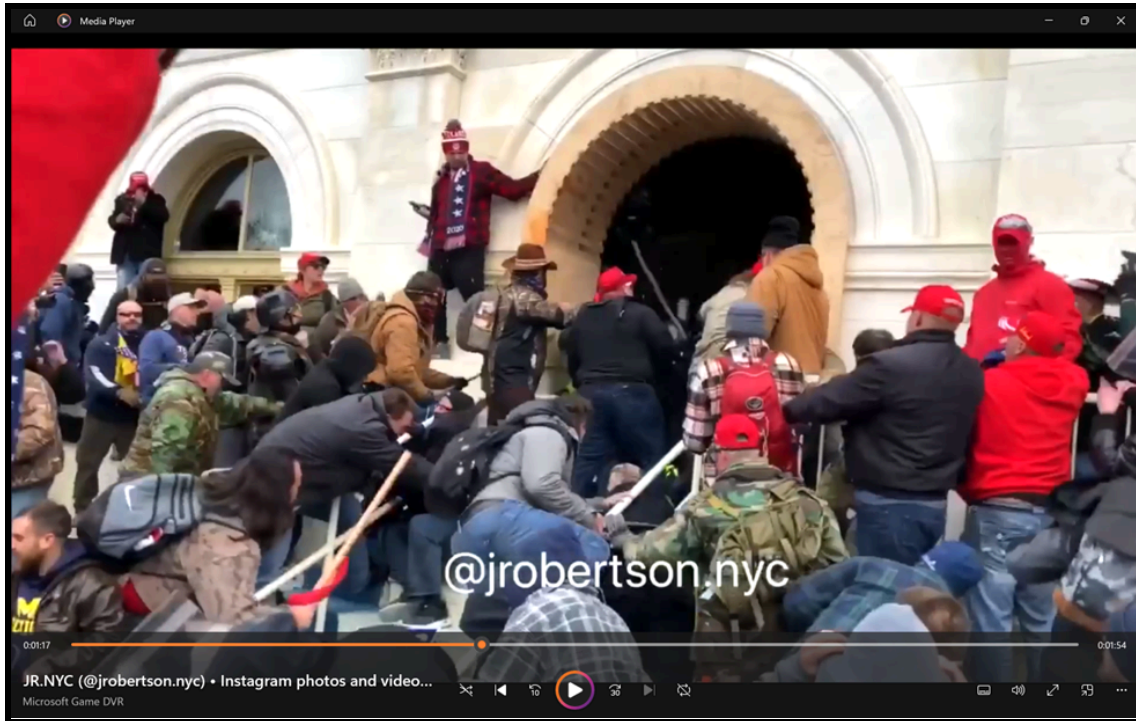
SCREENSHOT #034

Mid-swing of Strike #5 of Officer Morris's beating of Rosanne Boyland, the stick in her left hand makes contact with the defensive pole of the protester in the brown jacket and Officer Morris's stick goes flying up into the air.



SCREENSHOT #035

Officer Morris's stick is visible bouncing off the arch.



SCREENSHOT #036

The stick bounces off the arch and then kicks across the tunnel and falls between the officers in the middle of the entrance.



SECTION V: AUTOPSY

WASHINGTON D.C. ODMC REPORTS & MEDICAL RECORDS

Autopsy Report

[NOT YET PROVIDED TO US]

Toxicology Report

[NOT YET PROVIDED TO US]

Supplemental Report

[2021.04.06 GOV Autopsy Report - Supplemental Reports.PDF](#)

Combined D.C. Metro Reports (Redacted)

[2021.01.27 - D.C.Metro 21002749 - Combined Reports-Redacted.pdf](#)

G.W. University Hospital Medical Records

[2022.02.23 - GWH Medical Records.pdf](#)



DC OCME - GOV AUTOPSY SUMMARY

OCME Case # 21-00108



GOVERNMENT OF THE DISTRICT OF COLUMBIA
OFFICE OF THE CHIEF MEDICAL EXAMINER
401 E. Street, SW - 5th Floor
Washington, D.C. 20024

202-698-9000 (Office)

202-698-9100 (Fax)

DELAYED REPORT OF DIAGNOSIS

Case #: 21-00108

Approx. Interval (Onset to Death):

1a. Decedent: **Rosanne Marie Boyland**

2. Sex: **Female**

3. Date of Death: **1/6/2021**

4. Time of Death: **18:09**

28. Cause of Death: **Acute Amphetamine Intoxication**

Other Significant Conditions:

29. Autopsy? ☒

30. If Yes, Were Findings Considered in Determining Cause of Death ☒

33. Manner of Death: **Accident**

34. Date of Injury: **01/06/2021**

35. Time of Injury **1700**

36. Place of Injury: **Building**

37. Injury at Work? **No**

How Injury Occured:

Substance Abuse

If Transportation Accident, Specify:

38. Location of Injury: **US Capitol**
Washington

DC

Reason for Addendum:

Completed Cause of Death

Date Amended: **4/6/2021**

2nd Date Amended:

Gina M. Ingala

Signature



THE OFFICE OF THE CHIEF MEDICAL EXAMINER

Tuesday, April 6, 2021 12:00:00 AM

Page 1 of 1

Pg. # 113



OPINIONS FROM INDUSTRY EXPERTS

Barbara C. Wolf, MD - 2nd Opinion Paid By Family

Medical Examiner, District 5 & 24, State of Florida

Background and Qualifications

Dr. Wolf is a Phi Beta Kappa and Alpha Omega Alpha graduate from Boston University's Six-Year Program in Liberal Arts and Medical Education. She began her career in forensic pathology in Upstate New York where she started a private consulting practice providing forensic pathology services to law enforcement, coroners, district attorneys, defense attorneys, child protective services and other members of the criminal justice system. Additionally, in 1999 Dr. Wolf joined the Medicolegal Investigation Unit of the New York State Police, serving as the Director of Forensic Medicine until she relocated to Florida in 2001. She is currently the District Medical Examiner for Florida's District 5, covering five counties in central Florida and the Interim District Medical Examiner for District 24. She also serves as the Chair of the National Association of Medical Examiners Inspection and Accreditation Committee and as the Chair of the Florida Medical Examiners Commission. Dr. Wolf lectures throughout the country and internationally. She is on the faculties of the National District Attorneys Association and the International Firearms Specialist Academy and is an instructor for Practical Homicide Investigation® Seminars.

Dr. Wolf has also gained national and international exposure from a number of high profile cases. In 1991, she was involved in the exhumation of Medgar Evers, the civil rights leader who was shot to death in Jackson, MS in 1963. In 1995, she was involved in the exhumation of the bodies of five children from one family in Tioga County, New York, who were presumed to have died of Sudden Infant Death Syndrome (SIDS) between 1965-1971. The re-evaluation of these deaths led to the conviction of the mother for the suffocation of the infants. In 1994, she joined the highly regarded team of experts working on the O.J. Simpson double homicide case in Los Angeles. Dr. Wolf has also worked with a group of other forensic scientists in Croatia and Bosnia to assist in the identification of the remains in mass human graves that had been uncovered in areas previously controlled by opposing armies. She subsequently testified before the U.S. Congress' Commission on Security and Cooperation in Europe.

COD: Asphyxia (Compressional Asphyxia)

"It is my opinion that the cause of death of Rosanne Marie Boyland was asphyxia. Asphyxia is a general term that refers to anything that interferes with the body's availability, uptake or utilization of oxygen leading to insufficient oxygen being available to the brain (hypoxia). The death scenes and autopsies in some types of asphyxial deaths are often equivocal, i.e. open to interpretation as to the cause and/or manner of death. The cause and/or manner of death determined by a medical examiner in equivocal cases is not based solely on the postmortem examination but also on the review of the known investigative findings and circumstances leading up to and surrounding the death, considered in conjunction with the autopsy findings, laboratory tests and/or the past medical history of the decedent, depending on the nature of the particular case."



“There are many types of asphyxial deaths including neck compression, airway obstruction, smothering, compressional asphyxia, positional asphyxia, and exclusion of oxygen in the environment such as suffocating gases. There are also chemical asphyxiants such as carbon monoxide and cyanide. Asphyxial deaths are among the most difficult for forensic pathologists to diagnose at autopsy because few, if any, physical findings may be present.”

“In the case of Ms. Boyland, it is my opinion that the cause of death would be best classified as compressional (mechanical) asphyxia. Compressional asphyxia refers to a situation in which pressure is exerted on the chest or back of an individual impedes normal breathing and often leaves no diagnostic findings. The videotapes of the scene of the incident leading to her death and the descriptions of eyewitnesses support this conclusion. I agree with the autopsy pathologist that the manner of death was accidental.”

Underlying Factors

“There are other factors, the roles of which as potential contributors to Ms. Boyland’s death are unclear. One of these potentially contributory factors was her exposure to a lachrymator agent, a chemical such as tear gas used for crowd control, that can lead to incapacitation by stimulating the nerves of the lacrimal glands in the eyes to produce tears, cause spasm of the eyelids and burning sensations in the nose and throat. The scene videos and descriptions of rescue personnel clearly attest to the widespread use of such an agent. Although the physiologic effects are usually transient, exposure to lachrymator agents can be dangerous to the elderly and to individuals with underlying respiratory problems. Ms. Boyland did have a history of asthma, predominantly in childhood. However, microscopic examination of the section of her lung did not reveal evidence of an asthma attack. Rare eosinophils and mild thickening of the bronchial basement membranes were present, consistent with mild chronic reactive airway disease.

“In my opinion, the role of drug toxicity in Ms. Boyland’s death is also unclear. There was no evidence of illicit drug use. The finding of amphetamine in her postmortem blood and gastric contents is consistent with her prescribed use of Adderall, which is a combination drug containing four amphetamine salts. Taken at face value, the concentration of amphetamine is elevated, and there were apparently five extra pills missing from her prescription bottle if she had been taking them according to the prescribed directions. However, the interpretation of amphetamine concentrations in postmortem specimens is not always straightforward. Ms. Boyland’s obesity may have potentiated the storage of the drug in her body tissues, and blood from the inferior vena cava is not the optimal specimen for testing for amphetamines, which may be subject to postmortem redistribution. However, amphetamines are stimulants of the central nervous system, and it cannot be ruled out that the presence of amphetamines in her system potentiated a cardiac arrhythmia in the face of the physiological stress of the situation and her obesity and hypertensive cardiovascular disease.

“With that being said, it remains my opinion that amphetamine toxicity was not the proximate cause of Ms. Boyland’s death, although it cannot be ruled in or out as a contributory factor. As stated above, the evaluation of the concentrations of a drug or drugs found in autopsy specimens often necessitates



consideration of other factors including the scene and circumstances of death and the decedent's medical history. The circumstances surrounding Ms. Boyland's death are not consistent with a drug overdose as the proximate cause and cannot be ignored. A photograph taken of her prior to the incident at the Capitol steps shows her to be walking and smiling and does not suggest that she was impaired due to substance abuse."

Conclusion

"[Ms. Wolf] feels strongly that the OCME was wrong to conclude that amphetamine toxicity was the COD. It may have contributed but the ME ignored the surrounding circumstances to draw that conclusion here. [Ms. Wolf] believes that compressional asphyxia is the COD, that Rosanne fell or was pushed down and then other bodies came down on top of her and she could not breathe as a result.

"If [Ms. Wolf] had been the ME on this case, she would have concluded that it was compressional asphyxia and she probably would have included the information that she was exposed to tear gas type materials and also had a slightly elevated amphetamine concentration, which both could have been contributing factors to causing her arrhythmia."



Dr. Robert A. Middleberg - 3rd Opinion

Background and Qualifications

Dr. Robert A. Middleberg is a Senior Vice President and the Core Laboratory Director of Record at NMS Labs. He earned his Ph.D. in Pharmacology from Thomas Jefferson University and a Master's Degree in Chemistry from the University of Pittsburgh. He is a Fellow of the American Board of Forensic Toxicology (F-ABFT) and a Diplomate in Toxicological Chemistry from the American Board of Clinical Chemistry (DABCC-TC). Dr. Middleberg is a faculty member at Thomas Jefferson University. He holds a position on the Board of Directors for the American Board of Forensic Toxicology and served previously as a Director on the American Board of Clinical Chemistry. Dr. Middleberg was awarded the Rolla N. Harger award in 2013 for contributions to forensic toxicology by the Toxicology Section of the American Academy of Forensic Sciences. He is a member of many professional organizations, including the American Academy of Forensic Sciences, the American Association for Clinical Chemistry and the International Association of Therapeutic Drug Monitoring and Clinical Toxicology. Dr. Middleberg was a long-standing member of the College of American Pathologists' Toxicology Committee and now serves as an advisor and currently sits on the Editorial Board for the Journal of Forensic Sciences.

COD was NOT "Acute Amphetamine Toxicity"

"In [Dr. Middleberg's] opinion, the D.C.-OCME erred in concluding, without more, that amphetamine toxicity was the cause of death ("COD). The concentration of amphetamine in her system could be a contributing factor for her death, but was not the COD.

"Amphetamine concentration is difficult to calculate and various factors could have made those results less reliable, including that it was drawn from the inferior vena cava (IVC). Also, this conclusion is not supported by the gastric contents which show nothing to indicate an overdose.

"Her Adderall prescription more or less accounts for the amount in her system (again, keeping in mind that it is difficult to calculate and has many factors that can create variance), so she could have taken slightly more than the prescribed amount but not much. A look at all the circumstances and her other health factors can explain why her amphetamine concentration looks high without her having taken any overdose. However, it is hard if not impossible to prove a negative, i.e. that her high levels didn't at least contribute to other factors.

"[Dr. Middleberg] does not believe there was any indication that recreational drugs were involved.

Tear gas, CS gas, OC spray Requires Specialized Testing

"[Dr. Middleberg] cannot opine on whether tear gas, CS gas, etc. contributed to her death as the toxicology testing did not look for that. Testing for such materials is not (a) standard test and an ordinary lab, such as an ME's office has, would not even be capable of running those tests. A very limited number of labs even can test for such things.

"Even if testing showed the presence of chemicals from tear gas, etc., it would be hard to interpret the results and whether they contributed to her death. In short, we can suspect that it was involved in her death but we cannot prove it.



“[Dr. Middleberg] believes that, if challenged, the OCME would argue that even if it was not COD, then amphetamines contributed to her death. In other words, they would say that she had a high amphetamine concentration and then had an arrhythmia. [Dr. Middleberg] cannot rule that scenario out, but thinks it is definitely a cop out to say it was just amphetamine toxicity.”

Conclusion

“Dr. Middleberg cannot prove or disprove that either the amphetamine levels or the tear gas contributed to Rosanne’s death, but he believes the OCME was clearly wrong that amphetamine toxicity was the whole story, i.e. the COD.”



Dr. Adele Lewis - CME, TN - 4th Opinion

16-Yrs & 4,000+ autopsies

Background

Dr. Adele Maurer Lewis, M.D. is a forensic pathology and anatomical pathology expert witness from Tennessee. She has a medical practitioner's license from the state of Tennessee and is certified by the American Board of Pathology. Dr. Lewis completed her Bachelor of Arts in Biochemistry in 1993 from Bowdoin College and then earned her M.D. in 1997 from the University of Alabama School of Medicine. She further completed her two residencies and her first fellowship from the Vanderbilt University Medical Center. She then completed her second fellowship from the Office of the Medical Examiner for the State of Tennessee. Currently, Dr. Lewis is the Chief Medical Examiner at the Tennessee Department of Health.

COD is NOT "Acute Amphetamine Toxicity"

"I would disagree with the cause of death that was listed, though. She was listed as an acute amphetamine toxicity and as we say, context is everything. So when you look at the videotapes and read the eye witness accounts of what happened, **it's pretty clear that she probably was not a drug overdose death.**

She's being essentially trampled by several other people. I know it may have been a little bit confusing because she did have some pill fragments in her stomach, but her level of amphetamine was quite low. And she also had a prescription for it, so she presumably was taking it on a daily or near daily basis."

COD is "Traumatic Asphyxia"

When asked if she had a sense of what she would have ruled the COD as, Dr. Lewis responded, "Yeah, **I think probably a more appropriate Cause of Death would have been something like traumatic asphyxia due to being trampled or pinned under other people.**"

When asked why she would justify that cause of death if the body doesn't look like it had been trampled, Dr. Lewis replied, "You have to take into account the circumstances that were going on at the time. And a person can die an asphyxial death and have no signs of it on their body. And that's why we really like to have that background history and know what was going on at the time of death. **'Cause a person could be asphyxiated or trampled and have no evidence of it on their body.'**"

Conclusion

When questioned about the discrepancy between her expert review and that of the OCME Dr Lewis responded, "There is a range of autopsies. There are some authorities that it's a matter of interpretation and opinion, and those are the cases that forensic pathologists will sit around a conference table and argue about. And then there are some cases that are black and white, cut and dried, easy to interpret. There's room for interpretation in everything. And, you know, everything we do in medicine is based on our medical opinion and what's more likely than not. **And, to me, this case is more likely than not a traumatic asphyxia.**"

