IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 21-cr-00035-RC
)	
CLAYTON RAY MULLINS,)	
)	
Defendant.)	
)	

DEFENDANT'S RESPONSE

As he has done all his life, Clayton Mullins tried to help others on January 6, 2021. But this day was the worst of his life. Soon after his tragic encounters with Rosanne Boyland and Officer A.W., he found his wife and sister at the bottom of Capitol Hill and told them through tears about the awful events. That a storm of violence erupted on the Capitol steps and how he had tried to help a woman and a police officer who were in trouble on the ground. Clayton shared this with York Times Reporter same account New Dan Barry (https://www.nytimes.com/interactive/2021/10/16/us/capitol-riot.html?unlocked article code=1. Ok0.xOo7.RFwTgtGzKHrf&smid=em-share) and FBI Special Agent Christopher Cantrell on January 5, 2024 in Paducah, Kentucky (counsel and Assistant United States Attorney Alexandra Foster joined by phone).

In Officer A.W.'s Body Worn Camera (BWC) video, you can see Clayton helping folks who had fallen. The following still from that video at 16:26:12 (military time) shows the mass of humanity right in front of Clayton. He is trying to pull someone off the pile.



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This still at 16:27:03 from Officer A.W.'s BWC video shows Clayton with his arm above his head looking directly at Justin Winchell in the bright blue coat who is pleading for someone to

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help Ms. Boyland who is prostrate below him. Clayton was protecting his head from rioters who

were using a hockey stick and an American flag to attack the police officers. Two other people

were on the ground in need of help. This was the scene of suffering right in front of Clayton ten

seconds before Officer A.W. was viciously attacked and slammed to the ground.

We are grateful that the Government presented evidence of Clayton's attempt to help Ms.

Boyland. On page 23 of the Government's Sentencing Memorandum (ECF No. 408), in Exhibit

11C, you can see Clayton's distinctive Merrell hiking shoe just inches from Ms. Boyland who

lies at the edge of the archway. It came off as Clayton wedged his feet under her to block others

from trampling her. Please also refer to page 17 for Exhibit 8 where Clayton is at that precise

location holding on for dear life to save Ms. Boyland. His actions depicted in Exhibits 9A, 9B

and 9C where he clung to the side of the tunnel at the archway also show him vigorously

maintaining his protective posture over Ms. Boyland.

We humbly ask this Court to consider these distressing events as mitigation for the

mistake Clayton made in grabbing Officer A.W.'s leg.

Respectfully submitted,

Pat Munroe Woodward, Esq.,

D.C. Bar No. 436662

1783 Forest Drive, No. 330

Annapolis, MD 21401

Phone: 202-246-4679

Fax: 443-216-9812

patmwoodwardjr@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of January, 2024, I electronically filed the foregoing Response with the Clerk of Court using the CM / ECF system, which will send an electronic notification of such filing to all counsel of record.

<u>/s/</u> Pat Munroe Woodward, Esq.