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VIRGINIA: IN THE CIRCUIT COURT FOR THE COUNTY OF LOUISIANA

2020 FEB 25 PM 3:48

THOMAS ALEXANDER GARRETT, JR.,  
Plaintiff,

CIRCUIT COURT  
CLERK'S OFFICE  
LOUISIANA

v.

Case No: CL190004T7-00 BY [Signature] CLERK

FLANNA SHERIDAN GARRETT,  
Defendant.

**DEFENDANT'S ANSWER**

COMES NOW Defendant, Flanna Sheridan Garrett (hereinafter "Wife"), by counsel, and for her Answer to Plaintiff, Thomas Alexander Garrett's (hereinafter "Husband") Complaint for Divorce respectfully states as follows:

1. Wife admits the allegations in Paragraph 1.
2. Wife admits the allegations in Paragraph 2.
3. Wife admits the allegations in Paragraph 3 but also adds that the parties resided at one time at 82 I Street, Washington, DC 20003 and 223 6<sup>th</sup> Street, SE, Washington, DC 20003.
4. Wife admits that both parties filed Petitions to establish the care, custody and support of their daughter in the Louisa Juvenile and Domestic Relations District Court. The Louisa JDR Court entered a final, un-appealed Order of Custody and Visitation on January 7, 2020. The issues of child and spousal support remain pending.
5. Wife admits the facts alleged in Paragraphs 5-8.
6. Wife admits the facts alleged in Paragraph 9 except she can neither admit nor deny any allegations as to Plaintiff's income.
7. Wife admits the facts alleged in Paragraph 10.
8. Wife denies the facts alleged in Paragraph 11 except she admits she has not cohabitated with Husband since April 20, 2019.

9. Wife admits she is gainfully employed as alleged in Paragraph 12 but can neither admit nor deny anything related to Husband's employment.

10. Wife alleges this Court has no authority to address child custody or visitation. Such action would be barred by the doctrine of *res judicata*.

11. As set forth in detail in Wife's Counterclaim, Wife was legally justified in removing herself and the parties' daughter from the marital home.

12. As more fully set forth below in Wife's Counterclaim, Husband's behavior, of not only asking but demanding a divorce from Wife and giving her an ultimatum to move out of the marital home, was constructive desertion.

WHEREFORE, Wife prays this Court dismiss Husband's Complaint with prejudice; that this Court determine an appropriate monetary award pursuant to Va. Code § 20-107.3; that this Court award Wife spousal support, *pendente lite*, permanent, and a reservation thereof; that this Court award Wife child support, both *pendente lite* and permanent; that this Court award Wife sufficient fees and costs to carry on this suit pursuant to Va. Code § 20-103; that this Court award Wife her costs and fees expended in this suit; and that this Court award Wife any further relief deemed just and appropriate.

#### COUNTERCLAIM

COMES NOW Defendant/Cross-Plaintiff, Flanna Sheridan Garrett (hereinafter "Wife"), by counsel, and for her Counterclaim to Plaintiff/Cross-Defendant, Thomas Alexander Garrett, Jr.'s (hereinafter "Husband") Complaint for Divorce, respectfully states as follows:

1. Wife adopts and restates the allegations contained in Paragraphs 1-8 of Husband's Complaint for Divorce.

2. Husband is guilty of cruelty and constructive desertion.

3. Husband is guilty of both physical and emotional abuse.
4. On May 13, 2018, which was Mother's Day, Husband and Wife were in New Orleans together with their daughter, who was less than a year old.
5. As Wife and the child lay in their hotel room, Husband drank himself into a fiery rage.
6. Husband then strangled Wife while his own daughter lay sleeping next to her.
7. This was the last incident, in a long line of physical and emotional abuses by Husband against Wife, that apparently prompted Husband to publicly announce he was seeking treatment for his alcoholism.
8. Husband's irrational, unpredictable, violent and flat-out spiteful conduct has rendered marital cohabitation intolerable.
9. After the Mother's Day incident, Husband did engage in recovery treatment.
10. Unfortunately, while it appears Husband has remained sober, his abusive behavior returned.
11. In February 2019, Husband pushed Wife into a built-in cabinet in their home while Wife was holding their daughter. This occurred in Mineral, VA.
12. On April 15, 2019, while Husband and Wife were traveling in Belgrade, Serbia, Husband disclosed to Wife that he was thinking of ways to kill his then chief of staff because Husband blamed him for ruining his political career. Accusing others of being responsible for the harm Husband caused himself is a consistent theme throughout the marriage. Husband often focused his anger onto Wife as he also blamed her for ruining his career. This is despite the numerous ways Wife supported Husband in his political ambitions.

13. Husband's selfishness knows no bounds. At one point, Husband became frustrated that his infant daughter was crying in the back seat of the car. Husband's solution, instead of finding a way to console his daughter, was to play heavy metal music at an inappropriately loud volume. This distressed both Wife and their infant daughter. Wife tried to comfort and console their daughter. These acts seemed to send Husband into a fit of rage against Wife.

14. In January/February 2019, Husband was attempting to put his daughter down for a nap. This example represents one, out of at most five, times when Husband ever attempted to put his daughter down for a nap by himself.

15. The parties' daughter was taking a long time to fall asleep, which frustrated and angered Husband. Similarly to prior times when Husband was faced with frustration at the audacity of a non-compliant infant child, he flew into a fit of rage, and held YouTube music videos to the child's face. Eventually, satisfied at the mess of things created by his chaotic and aggressive behavior, Husband flew into a rage.

16. Over the course of the marriage, Husband has demonstrated a willingness to engage in violent, disruptive and abusive behavior with no regard to how his actions negatively affect his family. Husband has a history of physically pinning Wife to the ground, pushing her, and punching holes in the walls. He has also destroyed Wife's personal property. Husband also would pull Wife's hair and on at least two occasions Wife can remember, Husband struck her in the head.

17. Husband also engaged in a course of conduct designed to create emotional chaos around him. Husband often threatened suicide as a means to get his Wife and family to focus all

their emotional energy on himself, at the risk of creating traumatic experiences for his Wife in having to address what could be actual suicidal ideation.

18. For example, in August of 2017, Husband attempted to asphyxiate himself because Husband and Wife were having an argument. Husband was upset at the time because Wife, who was then suffering from pre-eclampsia and 8 months pregnant, refused to travel to Florida for her last month of pregnancy and refused to allow Husband's mother to move into their master bedroom. Wife did not object to Husband's mother moving in with them, it was only the master bedroom Wife took issue with.

19. Husband's reaction to this dispute was beyond the pale. During the argument, Wife, who was 8 months pregnant, took a breather to go for a walk. After walking 25-30 minutes, Wife returned home.

20. Wife found Husband in the garage inside his car, with the engine running, and the garage door was sealed. Husband appeared to have attempted suicide. Husband disclosed that his reaction was simply because he was mad at Wife. Husband stated, "I told you I was going to kill myself if you left (go for the walk)."

21. Even after sobriety, Husband continued to threaten to commit suicide whenever he felt frustrated or otherwise wanted to exert emotional control over Wife. Another example was April 15, 2019. While the parties were on a trip to Belgrade, Serbia, Husband, again in an effort to exert emotional control over Wife, threatened to jump off the balcony at the Rajiceva Shopping mall. Husband often blamed Wife for his many failings in life. Husband often blamed Wife for his surrender of his Congressional seat or otherwise ruining his life.

22. Husband also engaged in a pattern of emotional and verbal abuse in how he spoke to Wife during the marriage. Husband often insulted Wife using a level of colorful language that

is unbecoming of someone in his situation, such as calling her a “Bit\*\*, cu\*t, failure, never achieved anything in life, fat, dumpy, worthless,” etc.

23. Even more surprising were Husband’s efforts to teach the parties’ daughter to also call Wife these same names. On January 2019, Husband attempted to teach the parties’ daughter to call Wife a “cu\*t.”

24. This same month, Husband went through all of Wife’s old phones and journals while Wife was away working at the March for Life in Washington, DC.

25. Husband, convinced he found irrefutable proof of Wife’s infidelity, took it upon himself to take pictures of her old journals and began texting them to Wife’s phone. All the while, Husband leveled unsupported allegations of her infidelity at truck stops.

26. On occasion, Husband would disappear for days at a time without notice or explanation. He disclosed on more than one occasion in 2019 that he wanted to date younger women.

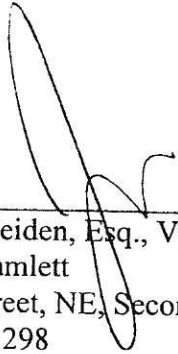
27. On February 9, 2019, Husband told Wife in no uncertain terms that he wanted to initiate a separation. Husband generously allowed Wife to live in their marital home until February 9, 2020. Husband went so far to even offer his Wife to live in the marital home rent free.

28. In addition to the harm caused by Husband’s chaotic behavior and excessive alcohol use, what free time Husband did spend at home, he often spent it playing hours upon hours of video games.

29. Husband’s erratic, alcohol-fueled outbursts, which included telling Wife multiple times to “get out of my house,” rose to the level of justification, connivance and condonation.

WHEREFORE, Wife prays this Court grant Wife a divorce *a mensa et thoro* on the grounds of cruelty or constructive desertion, to be merged into a divorce *a vinculo matrimonii* pursuant to Va. Code Section 20-91(6); that this Court determine an appropriate monetary award pursuant to Va. Code § 20-107.3; that this Court award Wife spousal support, *pendente lite*, permanent, and a reservation thereof; that this Court award Wife child support, both *pendente lite* and permanent; that this Court award Wife sufficient fees and costs to carry on this suit pursuant to Va. Code § 20-103; that this Court award Wife her costs and fees expended in this suit; and that this Court award Wife any further relief deemed just and appropriate.

FLANNA SHERIDAN GARRETT  
By counsel

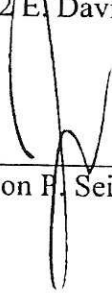


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Counsel for Defendant/Cross-Plaintiff

### CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing Answer and Counterclaim was sent by first class U.S. mail, postage prepaid, and by email this 25<sup>th</sup> day of February, 2020, to Jere M.H. Willis, III, Esq., Gayheart & Willis, PC, 142 E. Davis Street, Culpeper, VA 22701 (jwillis@gayheartandwillis.com).



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Jason P. Seiden