

THE STATE OF WYOMING  
COUNTY OF SWEETWATER

**IN THE CIRCUIT COURT**

THIRD JUDICIAL DISTRICT

<p>CITIBANK, N.A. PLAINTIFF,</p> <p>vs.</p> <p>JONATHAN LAWRENCE DEFENDANT</p>	<p>Docket CV, No. 2024-1588-P</p> <p><b>AMENDMENT TO AFFIRMATIVE DEFENSES</b></p> <p>FILED CIRCUIT COURT THIRD JUDICIAL DISTRICT FEB 20 2025 SWEETWATER COUNTY WY BY: <u>4</u></p>
--	--

Defendant Jonathan Lawrence does hereby submit his amendment to affirmative defenses as follows:

**AFFIRMATIVE DEFENSES**

As affirmative defenses against Plaintiff's complaint, Defendant alleges the following:

1. Plaintiff's complaint fails to state a claim upon which relief may be granted.
2. The contract upon which Plaintiff seeks relief is hearsay.
3. Plaintiff's claims are barred by the doctrine of unclean hands.
4. Plaintiff has no evidence of property damage or loss of assets, supported by first-hand fact witness.

5. Defendant reserves the right to amend this Answer to include such other affirmative defenses as may be supported by evidence with a firsthand fact witness or law.

WHEREFORE, Defendant moves the court to dismiss the Plaintiff's complaint with prejudice, or, in the alternative, that a judgment be entered in his favor against the Plaintiff and that the Defendant be awarded their costs, discovery expense, and such other relief as the Court deems proper.

DATED this 20<sup>th</sup> day of February, 2025.

*Without Prejudice*  
By: Jonathan Tobias Lawrence, Bene.

Jonathan Lawrence  
443 Valley View Lane, Lot 30  
Rock Springs, Wyoming 82901  
J2biasL@yahoo.com  
(307) 212-2915  
***Defendant pro per***

COPY of the foregoing sent via U.S. Postal Service on 20<sup>th</sup> day of February 2025 to:

Michael J. Ropella, 7-6162

7300 147<sup>th</sup> Street West, Suite 307

Apple Valley, MN 55124

mropella@rauschsturm.com

***Attorney for Plaintiff***

*Without Prejudice*  
By: Jonathan Tobias Lawrence, Bene.

Jonathan Lawrence