

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

GORDON M. PRICE,

Plaintiff,

v.

WILLIAM P. BARR,

U.S. Attorney General, et al.,

Defendants.

Civil Action No. 19-3672 (CKK)

ANSWER

Defendants, William P. Barr, U.S. Attorney General, and others, by and through undersigned counsel, hereby answer the complaint filed by Plaintiff Gordon M. Price (ECF No.

1). This case alleges violations of the First Amendment. Defendant answers the numbered paragraphs in the complaint as follows:

1. Admit.
2. The allegations of this paragraph are conclusions of law to which no response is required.
3. The allegations of this paragraph are conclusions of law to which no response is required.
4. The allegations of this paragraph are conclusions of law to which no response is required.
5. The allegations of this paragraph are conclusions of law to which no response is required.
6. The allegations of this paragraph are conclusions of law to which no response is required.
7. Deny.
8. Deny.

Parties

9. Defendants lack sufficient knowledge or information to admit or deny.

10. Admit.

11. Admit.

12. Admit.

Jurisdiction and Venue

13. Defendants reassert their answers to the previous paragraphs.

14. Admit.

15. Admit.

16. Admit.

17. Admit.

18. The allegations of this paragraph are conclusions of law to which no response is required.

19. The allegations of this paragraph are conclusions of law to which no response is required.

20. The allegations of this paragraph are conclusions of law to which no response is required.

21. The allegations of this paragraph are conclusions of law to which no response is required.

22. The allegations of this paragraph are conclusions of law to which no response is required.

23. The allegations of this paragraph are conclusions of law to which no response is required.

24. The allegations of this paragraph are conclusions of law to which no response is required.

25. The allegations of this paragraph are conclusions of law to which no response is required.

26. The allegations of this paragraph are conclusions of law to which no response is required.

27. The allegations of this paragraph are conclusions of law to which no response is required.

28. The allegations of this paragraph are conclusions of law to which no response is required.

29. The allegations of this paragraph are conclusions of law to which no response is required.

30. The allegations of this paragraph are conclusions of law to which no response is required.

31. The allegations of this paragraph are conclusions of law to which no response is required.

32. The allegations of this paragraph are conclusions of law to which no response is required.
33. The allegations of this paragraph are conclusions of law to which no response is required.
34. The allegations of this paragraph are conclusions of law to which no response is required.
35. The allegations of this paragraph are conclusions of law to which no response is required.
36. Defendants lack knowledge or information to admit or deny.
37. Admit that the Defendants learned of the release of the feature, but lack knowledge or information sufficient to know when the film was shot.
38. Defendants lack knowledge or information to know exactly whether the areas where the film was shot were open to the public during the times when shooting occurred. Admit that Price neither sought nor received permits.
39. Defendants lack knowledge or information to admit or deny.
40. Admit, except that Defendants lack knowledge or information as to the number of people attending.
41. Admit that there was coverage by local news media, but lack knowledge or information to admit or deny additional bookings.
42. Admit that Defendants learned that *Crawford Road* was on social media, but lack knowledge or information as to whether bookings increased.
43. Admit that Plaintiff was issued a violation and notice to appear at Pro Music and Sound, but lack knowledge or information as to the ownership of the business, and deny that the service occurred on the date stated. Defendants refer the Court to the violation notice for the best evidence of its contents.
44. Defendants lack knowledge or information to admit or deny.
45. Defendants lack knowledge or information to admit or deny.

- 46. Defendants lack knowledge or information to admit or deny.
- 47. Defendants lack knowledge or information to admit or deny.
- 48. Defendants lack knowledge or information to admit or deny.
- 49. Defendants lack knowledge or information to admit or deny.
- 50. Admit.
- 51. Admit that the prosecutor did not take this case to an evidentiary hearing. Defendants refer the Court to the government's motion for the best evidence of its content.
- 52. The allegations of this paragraph are conclusions of law to which no response is required.
- 53. Defendants lack sufficient knowledge or information to admit or deny. Defendants refer the Court to the referenced court filings for the best evidence of their content.
- 54. Defendants lack sufficient knowledge or information to admit or deny. Defendants refer the Court to the referenced court filings for the best evidence of their content.
- 55. Defendants admit that the referenced order was issued, and refer the Court to the order for the best evidence of its content.

Count I

- 56. Defendant re-asserts its answers to the previous paragraphs.
- 57. The allegations of this paragraph are conclusions of law to which no response is required.
- 58. The allegations of this paragraph are conclusions of law to which no response is required.
- 59. The allegations of this paragraph are conclusions of law to which no response is required.
- 60. The allegations of this paragraph are conclusions of law to which no response is required.
- 61. The allegations of this paragraph are conclusions of law to which no response is required.

Count II

- 62. Defendant re-asserts its answers to the previous paragraphs.

63. The allegations of this paragraph are conclusions of law to which no response is required.

64. Deny.

65. Deny.

66. The allegations of this paragraph are conclusions of law to which no response is required.

67. The allegations of this paragraph are conclusions of law to which no response is required.

68. The allegations of this paragraph are conclusions of law to which no response is required.

69. Deny.

70. The allegations of this paragraph are conclusions of law to which no response is required.

Count III

71. Defendant re-asserts its answers to the previous paragraphs.

72. The allegations of this paragraph are conclusions of law to which no response is required.

73. The allegations of this paragraph are conclusions of law to which no response is required.

74. The allegations of this paragraph are conclusions of law to which no response is required.

75. The allegations of this paragraph are conclusions of law to which no response is required.

76. The allegations of this paragraph are conclusions of law to which no response is required.

77. The allegations of this paragraph are conclusions of law to which no response is required.

78. The allegations of this paragraph are conclusions of law to which no response is required.

79. Deny.

80. The allegations of this paragraph are conclusions of law to which no response is required.

Count IV

81. Defendant re-asserts its answers to the previous paragraphs.

82. The allegations of this paragraph are conclusions of law to which no response is required.

83. The allegations of this paragraph are conclusions of law to which no response is required.

84. The allegations of this paragraph are conclusions of law to which no response is required.

85. The allegations of this paragraph are conclusions of law to which no response is required.

86. The allegations of this paragraph are conclusions of law to which no response is required.

Count V

87. Defendant re-asserts its answers to the previous paragraphs.

88. The allegations of this paragraph are conclusions of law to which no response is required.

89. Admit that the National Park Service has a posted a fee schedule. The remaining allegations of this paragraph are conclusions of law to which no response is required.

90. The allegations of this paragraph are conclusions of law to which no response is required.

91. The allegations of this paragraph are conclusions of law to which no response is required

92. The allegations of this paragraph are conclusions of law to which no response is required.

93. The allegations of this paragraph are conclusions of law to which no response is required.

94. Deny.

95. The allegations of this paragraph are conclusions of law to which no response is required.

96. Deny.

97. The allegations of this paragraph are conclusions of law to which no response is required.

Count VI

98. Defendant re-asserts its answers to the previous paragraphs.

99. Deny.

100. Deny.

101. The allegations of this paragraph are conclusions of law to which no response is required.

102. The allegations of this paragraph are conclusions of law to which no response is required.

103. The allegations of this paragraph are conclusions of law to which no response is required.

104. The allegations of this paragraph are conclusions of law to which no response is required.
105. The allegations of this paragraph are conclusions of law to which no response is required.
106. The allegations of this paragraph are conclusions of law to which no response is required.
107. The allegations of this paragraph are conclusions of law to which no response is required.

Count VII

108. Defendant re-asserts its answers to the previous paragraphs.
109. The allegations of this paragraph are conclusions of law to which no response is required.
110. The allegations of this paragraph are conclusions of law to which no response is required.
- Defendant denies that Plaintiff is entitled to the relief requested.

Prayer for Relief

To the extent an answer is deemed necessary to Plaintiff's prayer for relief, Defendants deny that Plaintiff is entitled to the relief requested or to any relief whatsoever. All allegations in the complaint not specifically admitted herein are denied.

Dated: February 11, 2020

Respectfully submitted,

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