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8
 9 IN THE UNITED STATES DISTRICT COURT
 10 FOR THE EASTERN DISTRICT OF CALIFORNIA
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12
 13 **MICHAEL RICHARDSON,**

14 Plaintiff,

15 **JEFFERSON SESSIONS, in his official**
 16 **capacities; XAVIER BECERRA, in his**
 17 **official capacities,**

18 Defendants.

2:17-cv-1838 JAM AC PS

ANSWER TO COMPLAINT OF
DEFENDANT ATTORNEY GENERAL
XAVIER BECERRA

Judge: The Honorable John A. Mendez
 Trial Date: None set
 Action Filed: September 5, 2017

1 Defendant Xavier Becerra, in his official capacity as Attorney General of the State of
2 California, hereby responds to Plaintiff Michael Richardson's Complaint as follows:

3 **INTRODUCTION**

4 1. In response to the allegations contained in paragraph 1 of the Complaint, Defendant
5 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
6 require admission or denial. To the extent admission or denial is deemed required, Defendant
7 Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
8 allegations and, therefore, denies them.

9 2. In response to the allegations contained in paragraph 2 of the Complaint, Defendant
10 Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
11 allegations and, therefore, denies the allegations therein.

12 3. In response to the allegations contained in paragraph 3 of the Complaint, Defendant
13 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
14 require admission or denial. To the extent admission or denial is required, Defendant Becerra
15 lacks knowledge or information sufficient to form a belief as to the truth of the allegations and,
16 therefore, denies the allegations therein.

17 4. In response to the allegations contained in paragraph 4 of the Complaint, Defendant
18 Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
19 allegations and, therefore, denies the allegations therein.

20 5. In response to the allegations contained in paragraph 5 of the Complaint, Defendant
21 Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
22 allegations and, therefore, denies the allegations therein.

23 6. In response to the allegations contained in paragraph 6 of the Complaint, Defendant
24 Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
25 allegations and, therefore, denies the allegations therein.

26 7. In response to the allegations contained in paragraph 7 of the Complaint, Defendant
27 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
28 require admission or denial. To the extent admission or denial is required, Defendant Becerra

1 lacks knowledge or information sufficient to form a belief as to the truth of the allegations and,
2 therefore, denies the allegations therein.

3 8. In response to the allegations contained in paragraph 8 of the Complaint, Defendant
4 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
5 require admission or denial. To the extent admission or denial is required, Defendant Becerra
6 lacks knowledge or information sufficient to form a belief as to the truth of the allegations and,
7 therefore, denies the allegations therein.

8 9. In response to the allegations contained in paragraph 9 of the Complaint, Defendant
9 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
10 require admission or denial. To the extent admission or denial is required, Defendant Becerra
11 admits that California conducts risk assessments on all persons convicted of sex offenses prior to
12 their release from prison, but denies that the citation to California Penal Code section 6601 and
13 6601.3 is an accurate citation. As to the remaining allegations, Defendant Becerra lacks
14 knowledge or information sufficient to form a belief as to the truth of the allegations and,
15 therefore, denies them.

16 10. In response to the allegations contained in paragraph 10 of the Complaint, Defendant
17 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
18 require admission or denial. To the extent admission or denial is required, Defendant Becerra
19 admits that registered sex offenders in California are subject to certain requirements under
20 California law. As to the remaining allegations, Defendant Becerra lacks knowledge or
21 information sufficient to form a belief as to the truth of the allegations and, therefore, denies
22 them.

23 11. In response to the allegations contained in paragraph 11 of the Complaint, Defendant
24 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
25 require admission or denial. To the extent admission or denial is required, Defendant Becerra
26 lacks knowledge or information sufficient to form a belief as to the truth of the allegations and,
27 therefore, denies the allegations therein.

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1 12. In response to the allegations contained in paragraph 12 of the Complaint, Defendant
2 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
3 require admission or denial. To the extent admission or denial is required, Defendant Becerra
4 denies that “[t]he state has been notified and is aware that this imputation of future dangerousness
5 is false in individual cases and for the majority registrants.” Defendant Becerra denies that the
6 cited reports “outline[s] the problems with the California sex offender scheme.” As to the
7 remaining allegations, Defendant Becerra lacks knowledge or information sufficient to form a
8 belief as to the truth of the allegations and, therefore, denies them.

9 13. In response to the allegations contained in paragraph 13 of the Complaint, Defendant
10 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
11 require admission or denial. To the extent admission or denial is required, Defendant Becerra
12 admits that registered sex offenders in California are subject to certain requirements under
13 California law. As to the remaining allegations, Defendant Becerra lacks knowledge or
14 information sufficient to form a belief as to the truth of the allegations and, therefore, denies the
15 allegations therein.

16 14. In response to the allegations contained in paragraph 14 of the Complaint, Defendant
17 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
18 require admission or denial. To the extent admission or denial is required, Defendant Becerra
19 lacks knowledge or information sufficient to form a belief as to the truth of the allegations and,
20 therefore, denies the allegations therein.

21 15. In response to the allegations contained in paragraph 15 of the Complaint, Defendant
22 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
23 require admission or denial. To the extent admission or denial is required, Defendant Becerra
24 lacks knowledge or information sufficient to form a belief as to the truth of the allegations and,
25 therefore, denies them.

26 16. In response to the allegations contained in paragraph 16 of the Complaint, Defendant
27 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
28 require admission or denial. To the extent admission or denial is required, Defendant Becerra

1 lacks knowledge or information sufficient to form a belief as to the truth of the allegations and,
2 therefore, denies them.

3 17. In response to the allegations contained in paragraph 17 of the Complaint, Defendant
4 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
5 require admission or denial. To the extent admission or denial is required, Defendant Becerra
6 lacks knowledge or information sufficient to form a belief as to the truth of the allegations and,
7 therefore, denies them.

8 18. In response to the allegations contained in paragraph 18 of the Complaint, Becerra
9 contends that the paragraph consists of legal argument and/or conclusions, which do not require
10 admission or denial. To the extent admission or denial is required, Defendant Becerra denies that
11 any state laws challenged in the Complaint constitute or impose “penalties.” As to the remaining
12 allegations, Defendant Becerra lacks knowledge or information sufficient to form a belief as to
13 the truth of the allegations and, therefore, denies the allegations therein.

14 19. In response to the allegations contained in paragraph 19 of the Complaint, Defendant
15 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
16 require admission or denial. To the extent admission or denial is required, Defendant Becerra
17 lacks knowledge or information sufficient to form a belief as to the truth of the allegations and,
18 therefore, denies them.

19 20. In response to the allegations contained in paragraph 20 of the Complaint, Defendant
20 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
21 require admission or denial. To the extent admission or denial is required, Defendant Becerra
22 lacks knowledge or information sufficient to form a belief as to the truth of the allegations and,
23 therefore, denies them.

24 21. In response to the allegations contained in paragraph 21 of the Complaint, Defendant
25 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
26 require admission or denial. To the extent admission or denial is required, Defendant Becerra
27 lacks knowledge or information sufficient to form a belief as to the truth of the allegations and,
28 therefore, denies them.

1 22. In response to the allegations contained in paragraph 22 of the Complaint, Defendant
2 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
3 require admission or denial. To the extent admission or denial is required, Defendant Becerra
4 denies all allegations.

5 23. In response to the allegations contained in paragraph 23 of the Complaint, Defendant
6 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
7 require admission or denial. To the extent admission or denial is required, Defendant Becerra
8 lacks knowledge or information sufficient to form a belief as to the truth of the allegations and,
9 therefore, denies them.

10 24. In response to the allegations contained in paragraph 24 of the Complaint, Defendant
11 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
12 require admission or denial. To the extent admission or denial is required, Defendant Becerra
13 lacks knowledge or information sufficient to form a belief as to what Plaintiff is “asking this court
14 to recognize,” and therefore denies that allegation. As to all remaining allegations, Defendant
15 Becerra denies them.

16 25. In response to the allegations contained in paragraph 25 of the Complaint, Defendant
17 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
18 require admission or denial. To the extent admission or denial is required, Defendant Becerra
19 denies them.

20 26. In response to the allegations contained in paragraph 26 of the Complaint, Defendant
21 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
22 require admission or denial. To the extent admission or denial is required, Defendant Becerra
23 lacks knowledge or information sufficient to form a belief as to what Plaintiff is “asking this court
24 to recognize,” and therefore denies that allegation. As to all remaining allegations, Defendant
25 Becerra denies them.

26 27. In response to the allegations contained in paragraph 27 of the Complaint, Defendant
27 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
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1 require admission or denial. To the extent admission or denial is required, Defendant Becerra
2 denies all allegations.

3 28. In response to the allegations contained in paragraph 28 of the Complaint, Defendant
4 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
5 require admission or denial. To the extent admission or denial is required, Defendant Becerra
6 denies all allegations.

7 29. In response to the allegations contained in paragraph 29 of the Complaint, Defendant
8 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
9 require admission or denial. To the extent admission or denial is required, Defendant Becerra
10 denies all allegations.

11 30. In response to the allegations contained in paragraph 30 of the Complaint, Defendant
12 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
13 require admission or denial. To the extent admission or denial is required, Defendant Becerra
14 answers as follows: Defendant Becerra denies that California makes assertions that Plaintiff is
15 “dangerous to children or other vulnerable populations, and places [him] in an inescapable class
16 of citizenship that the state purports to be dangerous.” Defendant Becerra admits that Penal Code
17 section 290.046 requires certain information about Plaintiff to be made available on California’s
18 Megan’s Law website, but denies that California law does not provide a procedure for
19 challenging that requirement. As to all remaining allegations, lacks knowledge or information
20 sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

21 31. In response to the allegations contained in paragraph 31 of the Complaint, Defendant
22 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
23 require admission or denial. To the extent admission or denial is required, Defendant Becerra
24 denies all allegations.

25 32. In response to the allegations contained in paragraph 32 of the Complaint, Defendant
26 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
27 require admission or denial. To the extent admission or denial is required, Defendant Becerra
28 denies all allegations.

1 33. In response to the allegations contained in paragraph 33 of the Complaint, Defendant
2 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
3 require admission or denial. To the extent admission or denial is required, Defendant Becerra
4 denies all allegations.

5 34. In response to the allegations contained in paragraph 34 of the Complaint, Defendant
6 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
7 require admission or denial. To the extent admission or denial is required, Defendant Becerra
8 answers as follows: Defendant Becerra admits that Plaintiff is required to comply all sex offender
9 reporting requirements that apply to him pursuant to California law. As to all remaining
10 allegations, Defendant Becerra lacks knowledge or information sufficient to form a belief as to
11 the truth of the allegations and, therefore, denies them.

12 35. In response to the allegations contained in paragraph 35 of the Complaint, Defendant
13 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
14 require admission or denial. To the extent admission or denial is required, Defendant Becerra
15 admits that California has numerous responsibilities to its residents including, crime prevention
16 and that California must follow the law, including the California and United States Constitutions.
17 As to all remaining allegations, Defendant Becerra lacks knowledge or information sufficient to
18 form a belief as to the truth of the allegations and, therefore, denies them.

19 36. In response to the allegations contained in paragraph 36 of the Complaint, Defendant
20 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
21 require admission or denial. To the extent admission or denial is required, Defendant Becerra
22 admits that California must follow the law, including the California and United States
23 Constitutions. As to all remaining allegations, Defendant Becerra lacks knowledge or
24 information sufficient to form a belief as to the truth of the allegations and, therefore, denies
25 them.

26 37. In response to the allegations contained in paragraph 37 of the Complaint, Defendant
27 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
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1 require admission or denial. To the extent admission or denial is required, Defendant Becerra
2 denies all allegations.

3 38. In response to the allegations contained in paragraph 38 of the Complaint, Defendant
4 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
5 require admission or denial. To the extent admission or denial is required, Defendant Becerra
6 denies all allegations.

7 39. In response to the allegations contained in paragraph 39 of the Complaint, Defendant
8 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
9 require admission or denial. To the extent admission or denial is required, Defendant Becerra
10 denies all allegations.

11 40. In response to the allegations contained in paragraph 40 of the Complaint, Defendant
12 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
13 require admission or denial. To the extent admission or denial is required, Defendant Becerra
14 admits that California must follow the law, including the California and United States
15 Constitutions. As to all remaining allegations, Defendant Becerra lacks knowledge or
16 information sufficient to form a belief as to the truth of the allegations and, therefore, denies
17 them.

18 41. In response to the allegations contained in paragraph 41 of the Complaint, Defendant
19 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
20 require admission or denial. To the extent admission or denial is required, Defendant Becerra
21 admits that California must follow the law, including the California and United States
22 Constitutions. Defendant Becerra denies that California has infringed on any constitutional
23 liberties. As to all remaining allegations, Defendant Becerra lacks knowledge or information
24 sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

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JURISDICTION AND VENUE

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2 42. In response to the allegations contained in paragraph 42 of the Complaint, Defendant
3 Becerra contends that Complaint speaks for itself. To the extent admission or denial is required,
4 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
5 allegations and, therefore, denies them.

6 43. In response to the allegations contained in paragraph 43 of the Complaint, Defendant
7 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
8 require admission or denial. To the extent admission or denial is required, Defendant Becerra
9 lacks knowledge or information sufficient to form a belief as to the truth of the allegations and,
10 therefore, denies them.

11 44. In response to the allegations contained in paragraph 44 of the Complaint, Defendant
12 Becerra admits that this court has jurisdiction under 18 U.S.C. section 1331 over the claims
13 against him to which he does not have immunity under the Eleventh Amendment. Defendant
14 Becerra denies all remaining allegations.

15 45. In response to the allegations contained in paragraph 45 of the Complaint, Defendant
16 Becerra admits that defendants are officers of agencies of the United States and the State of
17 California. Defendant Becerra lacks knowledge or information sufficient to form a belief as to
18 the truth of the remaining allegations and, therefore, denies them.

19 46. In response to the allegations contained in paragraph 46 of the Complaint, Defendant
20 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
21 require admission or denial. To the extent admission or denial is required, Defendant Becerra
22 denies all allegations.

23 **PARTIES**

24 47. Paragraph 47 contains no allegations. To the extent it does contain allegations,
25 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
26 remaining allegations and, therefore, denies them.

27 48. In response to the allegations contained in paragraph 48 of the Complaint, Defendant
28 Becerra admits that Plaintiff Michael Richardson is the plaintiff in this case. Defendant Becerra

1 lacks knowledge or information sufficient to form a belief as to the truth of the remaining
2 allegations and, therefore, denies them.

3 49. In response to the allegations contained in paragraph 49 of the Complaint, Defendant
4 Becerra admits that in 2006, Plaintiff was convicted of violating at least the following California
5 Penal Code sections: 288(a), 647.6(a), and 288.2(b). Defendant Becerra admits that Plaintiff has
6 completed his prison term and parole period for those convictions. Defendant Becerra lacks
7 knowledge or information sufficient to form a belief as to the truth of the remaining allegations
8 and, therefore, denies them.

9 50. In response to the allegations contained in paragraph 50 of the Complaint, Defendant
10 Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
11 allegations and, therefore, denies them.

12 51. In response to the allegations contained in paragraph 51 of the Complaint, Defendant
13 Becerra denies that Plaintiff has been “arrest free and a completely law abiding citizen” since his
14 release. As to the remaining allegations, Defendant Becerra lacks knowledge or information
15 sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

16 52. In response to the allegations contained in paragraph 52 of the Complaint, Defendant
17 Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
18 allegations and, therefore, denies them.

19 53. Paragraph 53 contains no allegations. To the extent it does contain allegations,
20 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
21 remaining allegations and, therefore, denies them.

22 54. In response to the allegations contained in paragraph 54 of the Complaint, Defendant
23 Becerra denies that he has direct authority over the implementation and enforcement of local
24 ordinances in the State of California. Defendant Becerra admits the remaining allegations.

25 55. In response to the allegations contained in paragraph 55 of the Complaint, Defendant
26 Becerra admits the allegations.

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1 69. In response to the allegations contained in paragraph 69 of the Complaint, Defendant
2 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
3 require admission or denial. To the extent admission or denial is required, Defendant Becerra
4 lacks knowledge or information sufficient to form a belief as to the truth of the allegations and,
5 therefore, denies them.

6 70. In response to the allegations contained in paragraph 70 of the Complaint, Defendant
7 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
8 require admission or denial. To the extent admission or denial is required, Defendant Becerra
9 denies all allegations.

10 71. In response to the allegations contained in paragraph 71 of the Complaint, Defendant
11 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
12 require admission or denial. To the extent admission or denial is required, Defendant Becerra
13 lacks knowledge or information sufficient to form a belief as to the truth of the allegations and,
14 therefore, denies them.

15 72. In response to the allegations contained in paragraph 72 of the Complaint, Defendant
16 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
17 require admission or denial. To the extent admission or denial is required, Defendant Becerra
18 lacks knowledge or information sufficient to form a belief as to the truth of the allegations and,
19 therefore, denies them.

20 73. In response to the allegations contained in paragraph 73 of the Complaint, Defendant
21 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
22 require admission or denial. To the extent admission or denial is required, Defendant Becerra
23 denies that California law “brands” plaintiff as a “‘sex offender’, i.e., a public danger, for life.”
24 As to all remaining allegations, Defendant Becerra lacks knowledge or information sufficient to
25 form a belief as to the truth of the allegations and, therefore, denies them.

26 74. In response to the allegations contained in paragraph 74 of the Complaint, Defendant
27 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
28 require admission or denial. To the extent admission or denial is required, Defendant Becerra

1 denies that the “public notification provisions” of California law “imply” that plaintiff is
2 “potentially dangerous.” As to all remaining allegations, Defendant Becerra lacks knowledge or
3 information sufficient to form a belief as to the truth of the allegations and, therefore, denies
4 them.

5 75. In response to the allegations contained in paragraph 75 of the Complaint, Defendant
6 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
7 require admission or denial. To the extent admission or denial is required, Defendant Becerra
8 denies that California law is causing any irreparable harm to Plaintiff. As to all remaining
9 allegations, Defendant Becerra lacks knowledge or information sufficient to form a belief as to
10 the truth of the allegations and, therefore, denies them.

11 76. In response to the allegations contained in paragraph 76 of the Complaint, Defendant
12 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
13 require admission or denial. To the extent admission or denial is required, Defendant Becerra
14 answers as follows: Defendant Becerra admits that California Penal Code section 290.46 requires
15 that the Department of Justice make public via the Internet Plaintiff’s photograph and current
16 address. Defendant Becerra denies that California’s sex offender registration and notification
17 laws violate Plaintiff’s liberty interest in any way. Defendant Becerra lacks knowledge or
18 information sufficient to form a belief as to the truth of the remaining allegations and, therefore,
19 denies them.

20 77. In response to the allegations contained in paragraph 77 of the Complaint, Defendant
21 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
22 require admission or denial. To the extent admission or denial is required, Defendant Becerra
23 lacks knowledge or information sufficient to form a belief as to the truth of the remaining
24 allegations and, therefore, denies them.

25 78. In response to the allegations contained in paragraph 78 of the Complaint, Defendant
26 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
27 require admission or denial. To the extent admission or denial is required, Defendant Becerra
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1 lacks knowledge or information sufficient to form a belief as to the truth of the allegations and,
2 therefore, denies them.

3 79. In response to the allegations contained in paragraph 79 of the Complaint, Defendant
4 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
5 require admission or denial. To the extent admission or denial is required, Defendant Becerra
6 lacks knowledge or information sufficient to form a belief as to the truth of the allegations and,
7 therefore, denies them.

8 80. In response to the allegations contained in paragraph 80 of the Complaint, Defendant
9 Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
10 allegations and, therefore, denies them.

11 81. In response to the allegations contained in paragraph 81 of the Complaint, Defendant
12 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
13 require admission or denial. To the extent admission or denial is required, Defendant Becerra
14 answers as follows. Defendant Becerra denies that California's sex offender registration laws
15 greatly impact Plaintiff's right to freedom of association. Defendant Becerra lacks knowledge or
16 information sufficient to form a belief as to the truth of the remaining allegations and, therefore,
17 denies them.

18 82. In response to the allegations contained in paragraph 82 of the Complaint, Defendant
19 Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
20 allegations and, therefore, denies them.

21 83. In response to the allegations contained in paragraph 83 of the Complaint, Defendant
22 Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
23 allegations and, therefore, denies them.

24 84. In response to the allegations contained in paragraph 84 of the Complaint, Defendant
25 Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
26 allegations and, therefore, denies them.

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1 85. In response to the allegations contained in paragraph 85 of the Complaint, Defendant
2 Becerra admits that the Megan’s Law website displays Plaintiff’s most recently reported address
3 and photo. Defendant Becerra denies all remaining allegations.

4 86. In response to the allegations contained in paragraph 86 of the Complaint, Defendant
5 Becerra admits that the Megan’s Law website displays Plaintiff’s most recently reported address
6 and photo. As to the allegation that this information does not constitute a court record available
7 to the public from the courts, Defendant Becerra lacks knowledge or information sufficient to
8 form a belief as to the truth of the allegation and, therefore, denies it. Defendant Becerra denies
9 all remaining allegations.

10 87. In response to the allegations contained in paragraph 87 of the Complaint, Defendant
11 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
12 require admission or denial. To the extent admission or denial is required, Defendant Becerra
13 lacks knowledge or information sufficient to form a belief as to the truth of the allegations and,
14 therefore, denies them.

15 88. In response to the allegations contained in paragraph 88 of the Complaint, Defendant
16 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
17 require admission or denial. To the extent admission or denial is required, Defendant Becerra
18 answers as follows: Defendant Becerra denies that any law challenged in the Complaint is a
19 “major obstacle” to Plaintiff’s “fundamental right to life, liberty and safety for [him] or [his]
20 family.” Defendant Becerra lacks knowledge or information sufficient to form a belief as to the
21 truth of the remaining allegations and, therefore, denies them.

22 89. In response to the allegations contained in paragraph 89 of the Complaint, Defendant
23 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
24 require admission or denial. To the extent admission or denial is required, Defendant Becerra
25 denies all allegations.

26 90. In response to the allegations contained in paragraph 90 of the Complaint, Defendant
27 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
28 require admission or denial. To the extent admission or denial is required, Defendant Becerra

1 lacks knowledge or information sufficient to form a belief as to the truth of the allegations and,
2 therefore, denies them.

3 **SECOND CLAIM**

4 **(Right to Equal Protection)**

5 91. In response to the allegations contained in paragraph 91 of the Complaint, Defendant
6 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
7 require admission or denial. To the extent admission or denial is required, Defendant Becerra
8 denies all allegations.

9 92. In response to the allegations contained in paragraph 92 of the Complaint, Defendant
10 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
11 require admission or denial. To the extent admission or denial is required, Defendant Becerra
12 expressly denies that it has unlawfully discriminated against Plaintiff in any way. As to the
13 remaining allegations, Defendant Becerra lacks knowledge or information sufficient to form a
14 belief as to the truth of the allegations and, therefore, denies them.

15 93. In response to the allegations contained in paragraph 93 of the Complaint, Defendant
16 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
17 require admission or denial. To the extent admission or denial is required, Defendant Becerra
18 lacks knowledge or information sufficient to form a belief as to the truth of the allegations and,
19 therefore, denies them.

20 94. In response to the allegations contained in paragraph 94 of the Complaint, Defendant
21 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
22 require admission or denial. To the extent admission or denial is required, Defendant Becerra
23 denies them.

24 95. In response to the allegations contained in paragraph 95 of the Complaint, Defendant
25 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
26 require admission or denial. To the extent admission or denial is required, Defendant Becerra
27 lacks knowledge or information sufficient to form a belief as to the truth of the allegations and,
28 therefore, denies them.

1 96. In response to the allegations contained in paragraph 96 of the Complaint, Defendant
2 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
3 require admission or denial. To the extent admission or denial is required, Defendant Becerra
4 denies them.

5 97. In response to the allegations contained in paragraph 97 of the Complaint, Defendant
6 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
7 require admission or denial. To the extent admission or denial is required, Defendant Becerra
8 denies them.

9 98. In response to the allegations contained in paragraph 98 of the Complaint, Defendant
10 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
11 require admission or denial. To the extent admission or denial is required, Defendant Becerra
12 denies them.

13 99. In response to the allegations contained in paragraph 99 of the Complaint, Defendant
14 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
15 require admission or denial. To the extent admission or denial is required, Defendant Becerra
16 denies them.

17 100. In response to the allegations contained in paragraph 100 of the Complaint,
18 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
19 which do not require admission or denial. To the extent admission or denial is required,
20 Defendant Becerra admits that the cited report exists and speaks for itself. As to all remaining
21 allegations, Defendant Becerra lacks knowledge or information sufficient to form a belief as to
22 the truth of the allegations and, therefore, denies them.

23 101. In response to the allegations contained in paragraph 101 of the Complaint,
24 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
25 which do not require admission or denial. To the extent admission or denial is required,
26 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
27 allegations and, therefore, denies them.

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1 102. In response to the allegations contained in paragraph 102 of the Complaint,
2 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
3 which do not require admission or denial. To the extent admission or denial is required,
4 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
5 allegations and, therefore, denies them.

6 103. In response to the allegations contained in paragraph 103 of the Complaint,
7 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
8 which do not require admission or denial. To the extent admission or denial is required,
9 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
10 allegations and, therefore, denies them.

11 104. In response to the allegations contained in paragraph 104 of the Complaint,
12 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
13 which do not require admission or denial. To the extent admission or denial is required,
14 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
15 allegations and, therefore, denies them.

16 105. In response to the allegations contained in paragraph 105 of the Complaint,
17 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
18 which do not require admission or denial. To the extent admission or denial is required,
19 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
20 allegations and, therefore, denies them.

21 106. In response to the allegations contained in paragraph 106 of the Complaint,
22 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
23 which do not require admission or denial. To the extent admission or denial is required,
24 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
25 allegations and, therefore, denies them.

26 107. In response to the allegations contained in paragraph 107 of the Complaint,
27 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
28 which do not require admission or denial. To the extent admission or denial is required,

1 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
2 allegations and, therefore, denies them.

3 108. In response to the allegations contained in paragraph 108 of the Complaint,
4 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
5 which do not require admission or denial. To the extent admission or denial is required,
6 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
7 allegations and, therefore, denies them.

8 109. In response to the allegations contained in paragraph 109 of the Complaint, Defendant
9 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
10 require admission or denial. To the extent admission or denial is required, Defendant Becerra
11 lacks knowledge or information sufficient to form a belief as to the truth of the allegations and,
12 therefore, denies them.

13 110. In response to the allegations contained in paragraph 110 of the Complaint,
14 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
15 which do not require admission or denial. To the extent admission or denial is required,
16 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
17 allegations, and therefore denies them.

18 111. In response to the allegations contained in paragraph 111 of the Complaint,
19 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
20 which do not require admission or denial. To the extent admission or denial is required,
21 Defendant Becerra answers as follows: Defendant Becerra admits that the referenced cases exist
22 and speak for themselves. As to all remaining allegations, Defendant Becerra denies them.

23 112. In response to the allegations contained in paragraph 112 of the Complaint,
24 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
25 which do not require admission or denial. To the extent admission or denial is required,
26 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
27 allegations and, therefore, denies them.
28

1 118. In response to the allegations contained in paragraph 118 of the Complaint,
2 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
3 which do not require admission or denial. To the extent admission or denial is required,
4 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
5 allegations and, therefore, denies them.

6 119. In response to the allegations contained in paragraph 119 of the Complaint,
7 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
8 allegations and, therefore, denies them.

9 120. In response to the allegations contained in paragraph 120 of the Complaint,
10 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
11 which do not require admission or denial. To the extent admission or denial is required,
12 Defendant Becerra admits that California has presence and residency restrictions, but denies that
13 they are “being enforced at random and at the discretion of individual municipalities in a
14 multitude of different versions.” As to all remaining allegations, Defendant Becerra lacks
15 knowledge or information sufficient to form a belief as to the truth of the allegations and,
16 therefore, denies them.

17 121. In response to the allegations contained in paragraph 121 of the Complaint,
18 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
19 which do not require admission or denial. To the extent admission or denial is required,
20 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
21 allegations and, therefore, denies them.

22 122. In response to the allegations contained in paragraph 122 of the Complaint,
23 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
24 allegations and, therefore, denies them.

25 123. In response to the allegations contained in paragraph 123 of the Complaint,
26 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
27 allegations and, therefore, denies them.
28

1 124. In response to the allegations contained in paragraph 124 of the Complaint,
2 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
3 which do not require admission or denial. To the extent admission or denial is required,
4 Defendant Becerra denies all allegations.

5 125. In response to the allegations contained in paragraph 125 of the Complaint,
6 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
7 which do not require admission or denial. To the extent admission or denial is required,
8 Defendant Becerra denies all allegations.

9 126. In response to the allegations contained in paragraph 126 of the Complaint,
10 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
11 which do not require admission or denial. To the extent admission or denial is required,
12 Defendant Becerra denies all allegations.

13 127. In response to the allegations contained in paragraph 127 of the Complaint,
14 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
15 which do not require admission or denial. To the extent admission or denial is required,
16 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
17 allegations and, therefore, denies them.

18 128. In response to the allegations contained in paragraph 128 of the Complaint,
19 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
20 allegations and, therefore, denies them.

21 129. In response to the allegations contained in paragraph 129 of the Complaint,
22 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
23 which do not require admission or denial. To the extent admission or denial is required,
24 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
25 allegations and, therefore, denies them.

26 130. In response to the allegations contained in paragraph 130 of the Complaint,
27 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
28 which do not require admission or denial. To the extent admission or denial is required,

1 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
2 allegations and, therefore, denies them.

3 131. In response to the allegations contained in paragraph 131 of the Complaint,
4 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
5 which do not require admission or denial. To the extent admission or denial is required,
6 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
7 allegations and, therefore, denies them.

8 132. In response to the allegations contained in paragraph 132 of the Complaint,
9 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
10 which do not require admission or denial. To the extent admission or denial is required,
11 Defendant Becerra denies all allegations.

12 133. In response to the allegations contained in paragraph 133 of the Complaint,
13 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
14 which do not require admission or denial. To the extent admission or denial is required,
15 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
16 allegations and, therefore, denies them.

17 134. In response to the allegations contained in paragraph 134 of the Complaint,
18 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
19 which do not require admission or denial. To the extent admission or denial is required,
20 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
21 allegations and, therefore, denies them.

22 135. In response to the allegations contained in paragraph 135 of the Complaint,
23 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
24 which do not require admission or denial. To the extent admission or denial is required,
25 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
26 allegations and, therefore, denies them.

27 136. In response to the allegations contained in paragraph 136 of the Complaint,
28 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,

1 which do not require admission or denial. To the extent admission or denial is required,
2 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
3 allegations and, therefore, denies them.

4 137. In response to the allegations contained in paragraph 137 of the Complaint,
5 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
6 allegations and, therefore, denies them.

7 138. In response to the allegations contained in paragraph 138 of the Complaint,
8 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
9 which do not require admission or denial. To the extent admission or denial is required,
10 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
11 allegations and, therefore, denies them.

12 139. In response to the allegations contained in paragraph 139 of the Complaint,
13 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
14 allegations and, therefore, denies them.

15 140. In response to the allegations contained in paragraph 140 of the Complaint,
16 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
17 allegations and, therefore, denies them.

18 141. In response to the allegations contained in paragraph 141 of the Complaint,
19 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
20 which do not require admission or denial. To the extent admission or denial is required,
21 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
22 allegations and, therefore, denies them.

23 142. In response to the allegations contained in paragraph 142 of the Complaint,
24 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
25 which do not require admission or denial. To the extent admission or denial is required,
26 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
27 allegations and, therefore, denies them.

28

1 143. In response to the allegations contained in paragraph 143 of the Complaint,
2 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
3 which do not require admission or denial. To the extent admission or denial is required,
4 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
5 allegations and, therefore, denies them.

6 144. In response to the allegations contained in paragraph 144 of the Complaint,
7 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
8 which do not require admission or denial. To the extent admission or denial is required,
9 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
10 allegations and, therefore, denies them.

11 145. In response to the allegations contained in paragraph 145 of the Complaint,
12 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
13 which do not require admission or denial. To the extent admission or denial is required,
14 Defendant Becerra denies that he or any California law “severely restrict[s] access to employment
15 and housing and limit [Plaintiff’s] ability to engage in normal human activity.” As to all
16 remaining allegations, Defendant Becerra lacks knowledge or information sufficient to form a
17 belief as to the truth of the allegations and, therefore, denies them.

18 146. In response to the allegations contained in paragraph 146 of the Complaint,
19 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
20 which do not require admission or denial. To the extent admission or denial is required,
21 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
22 allegations and, therefore, denies them.

23 147. In response to the allegations contained in paragraph 147 of the Complaint,
24 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
25 which do not require admission or denial. To the extent admission or denial is required,
26 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
27 allegations and, therefore, denies them.

28

1 148. In response to the allegations contained in paragraph 148 of the Complaint,
2 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
3 which do not require admission or denial. To the extent admission or denial is required,
4 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
5 allegations and, therefore, denies them.

6 149. In response to the allegations contained in paragraph 149 of the Complaint,
7 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
8 which do not require admission or denial. To the extent admission or denial is required,
9 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
10 allegations and, therefore, denies them.

11 150. In response to the allegations contained in paragraph 150 of the Complaint,
12 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
13 which do not require admission or denial. To the extent admission or denial is required,
14 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
15 allegations and, therefore, denies them.

16 151. In response to the allegations contained in paragraph 151 of the Complaint,
17 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
18 which do not require admission or denial. To the extent admission or denial is required,
19 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
20 allegations and, therefore, denies them.

21 152. In response to the allegations contained in paragraph 152 of the Complaint,
22 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
23 which do not require admission or denial. To the extent admission or denial is required,
24 Defendant Becerra denies that any California law referred to in paragraph 53 is “overly broad or
25 unconstitutionally vague,” and denies that Plaintiff is entitled to any relief whatsoever. As to the
26 remaining allegations, Defendant Becerra lacks knowledge or information sufficient to form a
27 belief as to the truth of the allegations and, therefore, denies them.
28

1 which do not require admission or denial. To the extent admission or denial is required,
2 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
3 allegations and, therefore, denies them.

4 160. In response to the allegations contained in paragraph 160 of the Complaint,
5 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
6 which do not require admission or denial. To the extent admission or denial is required,
7 Defendant Becerra denies the allegations in the first sentence. As to all remaining allegations,
8 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
9 allegations and, therefore, denies them.

10 161. In response to the allegations contained in paragraph 161 of the Complaint,
11 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
12 which do not require admission or denial. To the extent admission or denial is required,
13 Defendant Becerra denies that “there is no rational basis to continue to subject [Plaintiff] to these
14 laws....” As to the remaining allegations, Defendant Becerra lacks knowledge or information
15 sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

16 162. In response to the allegations contained in paragraph 162 of the Complaint,
17 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
18 which do not require admission or denial. To the extent admission or denial is required,
19 Defendant Becerra admits that “these laws have been seen as strictly regulatory in nature and not
20 considered part of the punishment for an offence.” As to all remaining allegations, Defendant
21 Becerra denies them.

22 163. In response to the allegations contained in paragraph 163 of the Complaint,
23 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
24 which do not require admission or denial. To the extent admission or denial is required,
25 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
26 allegations and, therefore, denies them.

27 164. In response to the allegations contained in paragraph 164 of the Complaint,
28 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,

1 which do not require admission or denial. To the extent admission or denial is required,
2 Defendant Becerra denies that “popularity” is the only basis for the laws challenged in the
3 Complaint. As to the remaining allegations, Defendant Becerra lacks knowledge or information
4 sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

5 165. In response to the allegations contained in paragraph 165 of the Complaint,
6 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
7 which do not require admission or denial. To the extent admission or denial is required,
8 Defendant Becerra denies that “With all the current facts and evidence of all the destabilizing
9 collateral consequences I endure and all the recent research done on this subject, there is
10 overwhelming evidence that these laws are completely irrational and counterproductive;
11 especially when applied to non-violent, first/single time offenders such as myself who currently
12 pose no cognizable risk of re-offense.” As to the remaining allegations, Defendant Becerra lacks
13 knowledge or information sufficient to form a belief as to the truth of the allegations and,
14 therefore, denies them.

15 166. In response to the allegations contained in paragraph 166 of the Complaint,
16 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
17 which do not require admission or denial. To the extent admission or denial is required,
18 Defendant Becerra admits that one purpose of the sex offender registry stated by the legislature is
19 the recidivism rate for sex offenses. As to all remaining allegations, Defendant Becerra denies
20 them.

21 167. In response to the allegations contained in paragraph 167 of the Complaint,
22 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
23 which do not require admission or denial. To the extent admission or denial is required,
24 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
25 allegations and, therefore, denies them.

26 168. In response to the allegations contained in paragraph 168 of the Complaint,
27 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
28 which do not require admission or denial. To the extent admission or denial is required,

1 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
2 allegations and, therefore, denies them.

3 169. In response to the allegations contained in paragraph 169 of the Complaint,
4 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
5 which do not require admission or denial. To the extent admission or denial is required,
6 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
7 allegations and, therefore, denies them.

8 170. In response to the allegations contained in paragraph 170 of the Complaint,
9 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
10 which do not require admission or denial. To the extent admission or denial is required,
11 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
12 allegations and, therefore, denies them.

13 171. In response to the allegations contained in paragraph 171 of the Complaint,
14 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
15 which do not require admission or denial. To the extent admission or denial is required,
16 Defendant Becerra denies that any attorneys for the state of California “feed the court the false
17 assumptions and misrepresenting or ignoring the actual facts of the low recidivism rates in just
18 about every case brought on sex offender laws, even though they (the government attorneys and
19 legislators) know that those assumptions have been thoroughly debunked.” Defendant Becerra
20 denies that “any assertion in this case or future cases by the government or the legislature
21 concerning facts about sex offender recidivism rates, or dangerousness, should be suspect and
22 should be thoroughly fact checked by the courts.” As to all remaining allegations, Defendant
23 Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
24 allegations and, therefore, denies them.

25 172. In response to the allegations contained in paragraph 172 of the Complaint,
26 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
27 which do not require admission or denial. To the extent admission or denial is required,
28

1 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
2 allegations and, therefore, denies them.

3 173. In response to the allegations contained in paragraph 173 of the Complaint,
4 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
5 which do not require admission or denial. To the extent admission or denial is required,
6 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
7 allegations and, therefore, denies them.

8 174. In response to the allegations contained in paragraph 174 of the Complaint,
9 Defendant Becerra denies all allegations.

10 175. In response to the allegations contained in paragraph 175 of the Complaint,
11 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
12 allegations and, therefore, denies them.

13 176. In response to the allegations contained in paragraph 176 of the Complaint,
14 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
15 which do not require admission or denial. To the extent admission or denial is required,
16 Defendant Becerra admits that the referenced California Department of Corrections and
17 Rehabilitation report exists and speaks for itself. As to all remaining allegations, Defendant
18 Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
19 allegations and, therefore, denies them.

20 177. In response to the allegations contained in paragraph 177 of the Complaint,
21 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
22 which do not require admission or denial. To the extent admission or denial is required,
23 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
24 allegations and, therefore, denies them.

25 178. In response to the allegations contained in paragraph 178 of the Complaint, Defendant
26 Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
27 allegations and, therefore, denies them.

28

1 179. In response to the allegations contained in paragraph 179 of the Complaint,
2 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
3 which do not require admission or denial. To the extent admission or denial is required,
4 Defendant Becerra denies them.

5 180. In response to the allegations contained in paragraph 180 of the Complaint,
6 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
7 allegations and, therefore, denies them.

8 181. In response to the allegations contained in paragraph 181 of the Complaint,
9 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
10 which do not require admission or denial. To the extent admission or denial is required,
11 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
12 allegations and, therefore, denies them.

13 182. In response to the allegations contained in paragraph 182 of the Complaint,
14 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
15 which do not require admission or denial. To the extent admission or denial is required,
16 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
17 allegations and, therefore, denies them.

18 183. In response to the allegations contained in paragraph 183 of the Complaint,
19 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
20 which do not require admission or denial. To the extent admission or denial is required,
21 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
22 allegations and, therefore, denies them.

23 184. In response to the allegations contained in paragraph 184 of the Complaint,
24 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
25 which do not require admission or denial. To the extent admission or denial is required,
26 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
27 allegations and, therefore, denies them.

28

1 185. In response to the allegations contained in paragraph 185 of the Complaint,
2 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
3 which do not require admission or denial. To the extent admission or denial is required,
4 Defendant Becerra denies all allegations.

5 186. In response to the allegations contained in paragraph 186 of the Complaint,
6 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
7 which do not require admission or denial. To the extent admission or denial is required,
8 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
9 allegations and, therefore, denies them.

10 187. In response to the allegations contained in paragraph 187 of the Complaint,
11 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
12 which do not require admission or denial. To the extent admission or denial is required,
13 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
14 allegations and, therefore, denies them.

15 188. In response to the allegations contained in paragraph 188 of the Complaint,
16 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
17 which do not require admission or denial. To the extent admission or denial is required,
18 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
19 allegations and, therefore, denies them.

20 189. In response to the allegations contained in paragraph 189 of the Complaint,
21 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
22 which do not require admission or denial. To the extent admission or denial is required,
23 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
24 allegations and, therefore, denies them.

25 190. In response to the allegations contained in paragraph 190 of the Complaint, Defendant
26 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
27 require admission or denial. To the extent admission or denial is required, Defendant Becerra
28 denies all allegations.

1 which do not require admission or denial. To the extent admission or denial is required,
2 Defendant Becerra denies all allegations.

3 196. In response to the allegations contained in paragraph 196 of the Complaint,
4 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
5 which do not require admission or denial. To the extent admission or denial is required,
6 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
7 allegations and, therefore, denies them.

8 197. In response to the allegations contained in paragraph 197 of the Complaint,
9 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
10 which do not require admission or denial. To the extent admission or denial is required,
11 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
12 allegations and, therefore, denies them.

13 198. In response to the allegations contained in paragraph 198 of the Complaint,
14 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
15 which do not require admission or denial. To the extent admission or denial is required,
16 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
17 allegations and, therefore, denies them.

18 199. In response to the allegations contained in paragraph 199 of the Complaint,
19 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
20 which do not require admission or denial. To the extent admission or denial is required,
21 Defendant Becerra denies all allegations.

22 200. In response to the allegations contained in paragraph 200 of the Complaint,
23 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
24 which do not require admission or denial. To the extent admission or denial is required,
25 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
26 allegations and, therefore, denies them.

27 201. In response to the allegations contained in paragraph 201 of the Complaint,
28 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,

1 which do not require admission or denial. To the extent admission or denial is required,
2 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
3 allegations and, therefore, denies them.

4 202. In response to the allegations contained in paragraph 202 of the Complaint,
5 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
6 which do not require admission or denial. To the extent admission or denial is required,
7 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
8 allegations and, therefore, denies them.

9 203. In response to the allegations contained in paragraph 203 of the Complaint,
10 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
11 which do not require admission or denial. To the extent admission or denial is required,
12 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
13 allegations and, therefore, denies them.

14 204. In response to the allegations contained in paragraph 204 of the Complaint,
15 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
16 which do not require admission or denial. To the extent admission or denial is required,
17 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
18 allegations and, therefore, denies them.

19 205. In response to the allegations contained in paragraph 205 of the Complaint,
20 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
21 which do not require admission or denial. To the extent admission or denial is required,
22 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
23 allegations and, therefore, denies them.

24 206. In response to the allegations contained in paragraph 205 of the Complaint,
25 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
26 which do not require admission or denial. To the extent admission or denial is required,
27 Defendant Becerra denies that “[o]nce you make the first restriction against a registrant...you
28 void that ruling, and violate Substantive Due Process by not having restrictions tailored to the

1 individual during the fair sentence portion of the trial.” As to all remaining allegations,
2 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
3 allegations and, therefore, denies them.

4 207. In response to the allegations contained in paragraph 207 of the Complaint,
5 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
6 which do not require admission or denial. To the extent admission or denial is required,
7 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
8 allegations and, therefore, denies them.

9 208. In response to the allegations contained in paragraph 208 of the Complaint,
10 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
11 which do not require admission or denial. To the extent admission or denial is required,
12 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
13 allegations and, therefore, denies them.

14 209. In response to the allegations contained in paragraph 209 of the Complaint,
15 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
16 which do not require admission or denial. To the extent admission or denial is required,
17 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
18 allegations and, therefore, denies them.

19 210. In response to the allegations contained in paragraph 210 of the Complaint,
20 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
21 which do not require admission or denial. To the extent admission or denial is required,
22 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
23 allegations and, therefore, denies them.

24 211. In response to the allegations contained in paragraph 211 of the Complaint,
25 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
26 which do not require admission or denial. To the extent admission or denial is required,
27 Defendant denies that there have been any “violations of the plethora of fundamental liberties
28 outlined in this motion.” As to all remaining allegations, Defendant Becerra lacks knowledge or

1 information sufficient to form a belief as to the truth of the allegations and, therefore, denies
2 them.

3 212. In response to the allegations contained in paragraph 212 of the Complaint,
4 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
5 which do not require admission or denial. To the extent admission or denial is required,
6 Defendant denies that “the legislative branch is over stepping its authority by passing laws that
7 take away the courts’ discretion in fashioning the punishments to fit the person and the crime.”
8 As to all remaining allegations, Defendant Becerra lacks knowledge or information sufficient to
9 form a belief as to the truth of the allegations and, therefore, denies them.

10 213. In response to the allegations contained in paragraph 213 of the Complaint,
11 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
12 which do not require admission or denial. To the extent admission or denial is required,
13 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
14 allegations and, therefore, denies them.

15 214. In response to the allegations contained in paragraph 214 of the Complaint,
16 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
17 which do not require admission or denial. To the extent admission or denial is required,
18 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
19 allegations and, therefore, denies them.

20 215. In response to the allegations contained in paragraph 215 of the Complaint,
21 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
22 which do not require admission or denial. To the extent admission or denial is required,
23 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
24 allegations and, therefore, denies them.

25 216. In response to the allegations contained in paragraph 216 of the Complaint,
26 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
27 which do not require admission or denial. To the extent admission or denial is required,
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1 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
2 allegations and, therefore, denies them.

3 217. In response to the allegations contained in paragraph 217 of the Complaint, Defendant
4 Becerra contends that the paragraph consists of legal argument and/or conclusions, which do not
5 require admission or denial. To the extent admission or denial is required, Defendant Becerra
6 lacks knowledge or information sufficient to form a belief as to the truth of the allegations and,
7 therefore, denies them.

8 218. In response to the allegations contained in paragraph 218 of the Complaint,
9 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
10 which do not require admission or denial. To the extent admission or denial is required,
11 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
12 allegations and, therefore, denies them.

13 219. In response to the allegations contained in paragraph 219 of the Complaint,
14 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
15 which do not require admission or denial. To the extent admission or denial is required,
16 Defendant Becerra denies all allegations.

17 220. In response to the allegations contained in paragraph 220 of the Complaint,
18 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
19 which do not require admission or denial. To the extent admission or denial is required,
20 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
21 allegations and, therefore, denies them.

22 221. In response to the allegations contained in paragraph 221 of the Complaint,
23 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
24 which do not require admission or denial. To the extent admission or denial is required,
25 Defendant Becerra denies all allegations.

26 222. In response to the allegations contained in paragraph 222 of the Complaint,
27 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
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1 which do not require admission or denial. To the extent admission or denial is required,
2 Defendant Becerra denies all allegations.

3 **SIXTH CLAIM**

4 **(Ex Post Facto)**

5 223. The Sixth Claim in the Complaint has been dismissed without leave to amend. *See*
6 ECF No. 34. To the extent admission or denial of the allegations in paragraphs 223-233 of the
7 Complaint is nevertheless required, Defendant Becerra denies all allegations in those paragraphs.

8 **SEVENTH CLAIM**

9 **(Separation of Powers Doctrine and Bill of Attainder)**

10 224. The Seventh Claim in the Complaint has been dismissed without leave to amend. *See*
11 ECF No. 34. To the extent admission or denial of the allegations in paragraphs 234-309 of the
12 Complaint is nevertheless required, Defendant Becerra denies all allegations in those paragraphs.

13 **EIGHTH CLAIM**

14 **(Cruel and Unusual Punishment)**

15 225. The Fifth Claim in the Complaint has been dismissed without leave to amend. *See*
16 ECF No. 34. To the extent admission or denial of the allegations in paragraphs 310-325 of the
17 Complaint is nevertheless required, Defendant Becerra denies all allegations in those paragraphs.

18 **NINTH CLAIM**

19 **(Involuntary Servitude)**

20 226. The Fifth Claim in the Complaint has been dismissed without leave to amend. *See*
21 ECF No. 34. To the extent admission or denial of the allegations in paragraphs 326-337 of the
22 Complaint is nevertheless required, Defendant Becerra denies all allegations in those paragraphs.

23 **(CONCLUSION)**

24 227. In response to the allegations contained in paragraph 338 of the Complaint,
25 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
26 which do not require admission or denial. To the extent admission or denial is required,
27 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
28 allegations and, therefore, denies them.

1 228. In response to the allegations contained in paragraph 339 of the Complaint,
2 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
3 which do not require admission or denial. To the extent admission or denial is required,
4 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
5 allegations and, therefore, denies them.

6 229. In response to the allegations contained in paragraph 340 of the Complaint,
7 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
8 which do not require admission or denial. To the extent admission or denial is required,
9 Defendant Becerra denies all allegations.

10 230. In response to the allegations contained in paragraph 341 of the Complaint,
11 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
12 which do not require admission or denial. To the extent admission or denial is required,
13 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
14 allegations and, therefore, denies them.

15 231. In response to the allegations contained in paragraph 342 of the Complaint,
16 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
17 which do not require admission or denial. To the extent admission or denial is required,
18 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
19 allegations and, therefore, denies them.

20 232. In response to the allegations contained in paragraph 343 of the Complaint,
21 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
22 which do not require admission or denial. To the extent admission or denial is required,
23 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
24 allegations and, therefore, denies them.

25 233. In response to the allegations contained in paragraph 344 of the Complaint,
26 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
27 which do not require admission or denial. To the extent admission or denial is required,
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1 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
2 allegations and, therefore, denies them.

3 234. In response to the allegations contained in paragraph 345 of the Complaint,
4 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
5 which do not require admission or denial. To the extent admission or denial is required,
6 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
7 allegations and, therefore, denies them.

8 235. In response to the allegations contained in paragraph 346 of the Complaint,
9 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
10 which do not require admission or denial. To the extent admission or denial is required,
11 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
12 allegations and, therefore, denies them.

13 236. In response to the allegations contained in paragraph 347 of the Complaint,
14 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
15 which do not require admission or denial. To the extent admission or denial is required,
16 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
17 allegations and, therefore, denies them.

18 237. In response to the allegations contained in paragraph 348 of the Complaint,
19 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
20 which do not require admission or denial. To the extent admission or denial is required,
21 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
22 allegations and, therefore, denies them.

23 238. In response to the allegations contained in paragraph 349 of the Complaint,
24 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
25 which do not require admission or denial. To the extent admission or denial is required,
26 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
27 allegations and, therefore, denies them.
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1 239. In response to the allegations contained in paragraph 350 of the Complaint,
2 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
3 which do not require admission or denial. To the extent admission or denial is required,
4 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
5 allegations and, therefore, denies them.

6 240. In response to the allegations contained in paragraph 351 of the Complaint,
7 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
8 which do not require admission or denial. To the extent admission or denial is required,
9 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
10 allegations and, therefore, denies them.

11 241. In response to the allegations contained in paragraph 352 of the Complaint,
12 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
13 which do not require admission or denial. To the extent admission or denial is required,
14 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
15 allegations and, therefore, denies them.

16 242. In response to the allegations contained in paragraph 353 of the Complaint,
17 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
18 which do not require admission or denial. To the extent admission or denial is required,
19 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
20 allegations and, therefore, denies them.

21 243. In response to the allegations contained in paragraph 354 of the Complaint,
22 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
23 which do not require admission or denial. To the extent admission or denial is required,
24 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
25 allegations and, therefore, denies them.

26 244. In response to the allegations contained in paragraph 355 of the Complaint,
27 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
28 which do not require admission or denial. To the extent admission or denial is required,

1 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
2 allegations and, therefore, denies them.

3 245. In response to the allegations contained in paragraph 356 of the Complaint,
4 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
5 which do not require admission or denial. Defendant Becerra denies that “there is no ambiguity
6 in any of the state or academic studies about the incredibly low rate of actual recidivism.” As to
7 the remaining allegations, Defendant Becerra lacks knowledge or information sufficient to form a
8 belief as to the truth of the allegations and, therefore, denies them.

9 246. In response to the allegations contained in paragraph 357 of the Complaint,
10 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
11 which do not require admission or denial. To the extent admission or denial is required,
12 Defendant Becerra denies all allegations.

13 247. In response to the allegations contained in paragraph 358 of the Complaint,
14 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
15 which do not require admission or denial. To the extent admission or denial is required,
16 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
17 allegations and, therefore, denies them.

18 248. In response to the allegations contained in paragraph 359 of the Complaint,
19 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
20 which do not require admission or denial. To the extent admission or denial is required,
21 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
22 allegations and, therefore, denies them.

23 249. In response to the allegations contained in paragraph 360 of the Complaint,
24 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
25 which do not require admission or denial. To the extent admission or denial is required,
26 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
27 allegations and, therefore, denies them.
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1 250. In response to the allegations contained in paragraph 361 of the Complaint,
2 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
3 which do not require admission or denial. To the extent admission or denial is required,
4 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
5 allegations and, therefore, denies them.

6 251. In response to the allegations contained in paragraph 362 of the Complaint,
7 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
8 which do not require admission or denial. To the extent admission or denial is required,
9 Defendant Becerra denies all allegations.

10 252. In response to the allegations contained in paragraph 363 of the Complaint,
11 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
12 which do not require admission or denial. To the extent admission or denial is required,
13 Defendant Becerra denies all allegations.

14 253. In response to the allegations contained in paragraph 364 of the Complaint,
15 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
16 which do not require admission or denial. To the extent admission or denial is required,
17 Defendant Becerra denies all allegations.

18 254. In response to the allegations contained in paragraph 365 of the Complaint,
19 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
20 which do not require admission or denial. To the extent admission or denial is required,
21 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
22 allegations and, therefore, denies them.

23 255. In response to the allegations contained in paragraph 366 of the Complaint,
24 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
25 which do not require admission or denial. To the extent admission or denial is required,
26 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
27 allegations and, therefore, denies them.

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1 256. In response to the allegations contained in paragraph 367 of the Complaint,
2 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
3 which do not require admission or denial. To the extent admission or denial is required,
4 Defendant Becerra denies that “there is not even a rational basis for the existence of these laws
5 other than extending punishment to those that have served their time.” Defendant Becerra denies
6 that “[t]here is also no indication that the reporting requirements of registration and the various
7 frequencies required to report in any way deters crime, assists in investigations, or improves the
8 safety of citizens.” Defendant Becerra denies that “the arbitrary natures of the laws are simply
9 trying to deter behavior that is already a crime.” Defendant Becerra denies that “Federal and
10 State registry laws are subject to strict scrutiny because they significantly burdens [*sic*]
11 fundamental constitutional liberties and fail that scrutiny because they are not narrowly tailored to
12 serve a compelling state interest.” As to all remaining allegations, Defendant Becerra lacks
13 knowledge or information sufficient to form a belief as to the truth of the allegations and,
14 therefore, denies them.

15 257. In response to the allegations contained in paragraph 368 of the Complaint,
16 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
17 which do not require admission or denial. To the extent admission or denial is required,
18 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
19 allegations and, therefore, denies them.

20 258. In response to the allegations contained in paragraph 369 of the Complaint,
21 Defendant Becerra admits that the California Department of Justice has access to Plaintiff’s
22 criminal record and photograph. As to all remaining allegations, Defendant Becerra lacks
23 knowledge or information sufficient to form a belief as to the truth of the allegations and,
24 therefore, denies them.

25 259. In response to the allegations contained in paragraph 370 of the Complaint,
26 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
27 which do not require admission or denial. To the extent admission or denial is required,
28 Defendant Becerra denies all allegations.

1 260. In response to the allegations contained in paragraph 371 of the Complaint,
2 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
3 which do not require admission or denial. To the extent admission or denial is required,
4 Defendant Becerra admits that Welfare and Institutions Code section 6601 and 6601.3 speaks for
5 itself. As to all remaining allegations, Defendant Becerra denies them.

6 261. In response to the allegations contained in paragraph 372 of the Complaint,
7 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
8 which do not require admission or denial. To the extent admission or denial is required,
9 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
10 allegations and, therefore, denies them.

11 262. In response to the allegations contained in paragraph 373 of the Complaint,
12 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
13 which do not require admission or denial. To the extent admission or denial is required,
14 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
15 allegations and, therefore, denies them.

16 263. In response to the allegations contained in paragraph 374 of the Complaint,
17 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
18 which do not require admission or denial. To the extent admission or denial is required,
19 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
20 allegations and, therefore, denies them.

21 264. In response to the allegations contained in paragraph 375 of the Complaint,
22 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
23 which do not require admission or denial. To the extent admission or denial is required,
24 Defendant Becerra lacks knowledge or information sufficient to form a belief as to the truth of the
25 allegations and, therefore, denies them.

26 265. In response to the allegations contained in paragraph 376 of the Complaint,
27 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
28

1 which do not require admission or denial. To the extent admission or denial is required,
2 Defendant Becerra denies all allegations.

3 266. In response to the allegations contained in paragraph 377 of the Complaint,
4 Defendant Becerra contends that the paragraph consists of legal argument and/or conclusions,
5 which do not require admission or denial. To the extent admission or denial is required,
6 Defendant Becerra admits that “[n]o one can doubt that child sexual abuse is traumatic and
7 devastating.” As to all remaining allegations, Defendant Becerra denies them.

8 **(REQUEST FOR RELIEF)**

9 267. No response is required to the request for relief in paragraphs 378-388 of the
10 Complaint. To the extent a response is required, Defendant Becerra denies all allegations therein
11 and specifically denies that Plaintiff is entitled to any relief whatsoever.

12 **(PRAYER)**

13 268. No response is required to the prayer on page 92, lines 8-19 of the Complaint. To the
14 extent a response is required, Defendant Becerra denies all allegations therein and specifically
15 denies that Plaintiff is entitled to any relief whatsoever.

16 **DEFENSES**

17 In addition to the foregoing admissions and denials, and without admitting any allegations
18 contained in the Complaint, Defendant Becerra asserts the following defenses:

19 **FIRST DEFENSE**

20 The Complaint, and each cause of action alleged therein, fails to state a claim on which
21 relief can be granted.

22 **SECOND DEFENSE**

23 The Complaint, and each cause of action alleged therein, is barred by the 11th Amendment
24 of the U.S. Constitution.

25 **SECOND DEFENSE**

26 The Complaint, and each cause of action alleged therein, are time-barred by the applicable
27 statutes of limitations, including but not limited to California Code of Civil Procedure section
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1 338, because Plaintiff claims to have been subject to the challenged statutes since his release from
2 prison in 2088.

3 **THIRD DEFENSE**

4 The Complaint, and each cause of action alleged therein, is barred by the doctrine of laches.

5 **FOURTH DEFENSE**

6 Plaintiffs has waived any privacy rights he may have had in the challenged Internet
7 information by disclosing the information to third parties.

8 **FIFTH DEFENSE**

9 Plaintiff is estopped from asserting any privacy rights he may have had in the challenged
10 Internet information by disclosing the information to third parties.

11 **SIXTH DEFENSE**

12 The challenged statutory provisions do not implicate any of Plaintiff's Constitutional
13 rights.

14 **SEVENTH DEFENSE**

15 To the extent that any of Plaintiff's Constitutional rights are implicated by the challenged
16 statutory provisions, the invasion of rights is incidental and is outweighed by California's
17 countervailing interest in strengthening its laws regarding sexual exploitation, including sex
18 offender registration requirements, to allow law enforcement to track and prevent sex
19 offenses and human trafficking.

20 **RESERVATION OF DEFENSES**

21 The foregoing defenses are raised without waiver of any other defenses that might become
22 known during this litigation. Defendant Becerra hereby reserves his right to amend or
23 supplement his answer to assert any other related defenses as they become available.

24 **PRAYER OF DEFENDANT BECERRA**

25 WHEREFORE, Defendant Becerra prays that:

- 26 1. The Complaint, and all claims and prayers for relief therein, be denied in their
27 entirety;
- 28 2. Petitioners take nothing from Defendant Becerra by this action;

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3. Defendant Becerra be awarded its costs incurred in defending this action; and
4. Defendant Becerra be awarded such further relief that the Court may deem just and proper.

Dated: October 31, 2018

Respectfully submitted,

XAVIER BECERRA
Attorney General of California
ANTHONY R. HAKL
Supervising Deputy Attorney General

/s/ Gabrielle D. Boutin

GABRIELLE D. BOUTIN
Deputy Attorney General
*Attorneys for Defendant
Attorney General Xavier Becerra*

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CERTIFICATE OF SERVICE

Case Name: **Richards, Michael v. Jefferson** No. **2:17-cv-1838 JAM AC PS**
Sessions, et al.

I hereby certify that on October 31, 2018, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

ANSWER TO COMPLAINT OF DEFENDANT ATTORNEY GENERAL XAVIER BECERRA

Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar at which member's direction this service is made. I am 18 years of age or older and not a party to this matter. I am familiar with the business practice at the Office of the Attorney General for collection and processing of correspondence for mailing with the United States Postal Service. In accordance with that practice, correspondence placed in the internal mail collection system at the Office of the Attorney General is deposited with the United States Postal Service with postage thereon fully prepaid that same day in the ordinary course of business.

I further certify that some of the participants in the case are not registered CM/ECF users. On October 31, 2018, I have caused to be mailed in the Office of the Attorney General's internal mail system, the foregoing document(s) by First-Class Mail, postage prepaid, or have dispatched it to a third party commercial carrier for delivery within three (3) calendar days to the following non-CM/ECF participants:

Michael Richardson
4624 Ashdale Court, #4
Sacramento, CA 95841

Pro Per

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on October 31, 2018, at Sacramento, California.

Eileen A. Ennis
Declarant

/s/ Eileen A. Ennis
Signature