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Attorneys for Defendants

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF IDAHO**

JANE DOE #35, JANE DOE #36,)	
JOHN DOE #115, JOHN DOE #117,)	Case No. 1:16-cv-429-DCN
and JOHN DOE #123,)	
)	ANSWER TO FOURTH
Plaintiffs,)	AMENDED COMPLAINT
)	
vs.)	
)	
RAÚL R. LABRADOR, Attorney)	
General of the State of Idaho, <i>et al.</i> ,)	
)	
Defendants.)	

Respondents Raúl R. Labrador, in his official capacity as Attorney General for the State of Idaho, and Kedrick Wills in his official capacity as Director of the Idaho State Police, hereby answer the Fourth Amended Complaint and assert affirmative defenses in this matter as follows:

Defendants deny each and every allegation contained in the Fourth Amended Complaint unless expressly admitted herein.

1. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 1 and therefore deny the same.

2. Defendants lack sufficient information to form a belief regarding the truth of the allegations of the first clause of paragraph 2, and therefore deny the same. Defendants deny the allegations of the second clause of paragraph 2.

3. Defendants lack sufficient information to form a belief regarding whether Plaintiffs are or are not required to register under SORA and, if so, what restrictions are placed on them, and therefore deny the allegations of paragraph 3.

4. Defendants admit the allegations of paragraph 4 only to the extent that it sets forth what “Plaintiffs ask this Court to recognize,” but deny the remaining allegations.

5. Defendants assert that the cited cases speak for themselves, and therefore neither admit nor deny the allegations of paragraph 5.

6. Defendants deny the allegations of paragraph 6.

7. Defendants deny the allegations of paragraph 7.

8. Defendants admit the allegations of paragraph 8 to the extent it sets forth the relief requested by Plaintiffs, but deny that Plaintiffs are entitled to the requested relief.

9. Defendants admit the allegations of paragraph 9 to the extent it sets forth the relief requested by Plaintiffs, but deny that Plaintiffs are entitled to the

requested relief.

10. Defendants admit that jurisdiction is proper.

11. Defendants deny the allegations of paragraph 11 except that the cited federal statutes and rules speak for themselves.

12. Defendants deny the allegations of paragraph 12 except that the cited federal statute speaks for itself.

13. Defendants admit that venue is proper, but assert that they lack sufficient information to form a belief regarding Plaintiffs' specific circumstances and therefore deny the remaining allegations.

14. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 14 and therefore deny the same.

15. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 15 and therefore deny the same.

16. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 16 and therefore deny the same.

17. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 17 and therefore deny the same.

18. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 18 and therefore deny the same.

19. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 19 and therefore deny the same.

20. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 20 and therefore deny the same.

21. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 21 and therefore deny the same.

22. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 22 and therefore deny the same.

23. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 23 and therefore deny the same.

24. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 24 and therefore deny the same.

25. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 25 and therefore deny the same.

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28. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 28 and therefore deny the same.

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33. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 33 and therefore deny the same.

34. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 34 and therefore deny the same.

35. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 35 and therefore deny the same.

36. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 36 and therefore deny the same.

37. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 37 and therefore deny the same.

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49. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 49 and therefore deny the same.

50. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 50 and therefore deny the same.

51. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 51 and therefore deny the same.

52. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 52 and therefore deny the same.

53. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 53 and therefore deny the same.

54. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 54 and therefore deny the same.

55. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 55 and therefore deny the same.

56. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 56 and therefore deny the same.

57. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 57 and therefore deny the same.

58. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 58 and therefore deny the same.

59. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 59 and therefore deny the same.

60. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 60 and therefore deny the same.

61. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 61 and therefore deny the same.

62. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 62 and therefore deny the same.

63. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 63 and therefore deny the same.

64. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 64 and therefore deny the same.

65. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 65 and therefore deny the same.

66. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 66 and therefore deny the same.

67. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 67 and therefore deny the same.

68. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 68 and therefore deny the same.

69. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 69 and therefore deny the same.

70. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 70 and therefore deny the same.

71. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 71 and therefore deny the same.

72. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 72 and therefore deny the same.

73. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 73 and therefore deny the same.

74. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 74 and therefore deny the same.

75. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 75 and therefore deny the same.

76. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 76 and therefore deny the same.

77. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 77 and therefore deny the same.

78. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 78 and therefore deny the same.

79. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 79 and therefore deny the same.

80. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 80 and therefore deny the same.

81. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 81 and therefore deny the same.

82. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 82 and therefore deny the same.

83. Defendants deny the allegations of paragraph 83.

84. Defendants deny the allegations of paragraph 84 except that Defendant Kedrick Wills is the director of the Idaho State Police and the cited statute speaks for itself.

85. Defendants deny the allegations of paragraph 85 except the referenced law speaks for itself.

86. Defendants deny the allegations of paragraph 86 except the cited statutes speak for themselves.

87. Defendants deny the allegations of paragraph 87 except the referenced law speaks for itself.

88. Defendants deny the allegations of paragraph 88 except the referenced law speaks for itself.

89. Defendants deny the allegations of paragraph 89 except the referenced law speaks for itself.

90. Defendants deny the allegations of paragraph 90 except the referenced statute and law speak for themselves.

91. Defendants deny the allegations of paragraph 91 except the referenced law speaks for itself.

92. Defendants deny the allegations of paragraph 92 except the referenced law speaks for itself.

93. Defendants deny the allegations of paragraph 93 except the referenced law speaks for itself.

94. Defendants admit the allegations of paragraph 94.

95. Defendants deny the allegations of paragraph 95 except the referenced amendments speak for themselves.

96. Defendants deny the allegations of paragraph 96 except the referenced amendments speak for themselves.

97. Defendants deny the allegations of paragraph 97 except the referenced amendment speaks for itself.

98. Defendants deny the allegations of paragraph 98 except the referenced law speaks for itself.

99. Defendants deny the allegations of paragraph 99 except the referenced amendment speaks for itself.

100. Defendants deny the allegations of paragraph 100 except the referenced amendments speak for themselves.

101. Defendants deny the allegations of paragraph 101 except the referenced law speaks for itself.

102. Defendants deny the allegations of paragraph 102 except the cited statute speaks for itself.

103. Defendants deny the allegations of paragraph 103 except the referenced amendments speak for themselves.

104. Defendants deny the allegations of paragraph 104 except the referenced amendments speak for themselves.

105. Defendants admit the allegations of paragraph 105.

106. Defendants deny the allegations of paragraph 106 except the referenced amendments speak for themselves.

107. Defendants deny the allegations of paragraph 107 except the referenced amendments speak for themselves.

108. Defendants deny the allegations of paragraph 108 except the referenced amendments speak for themselves.

109. Defendants admit the allegations of paragraph 109.

110. Defendants deny the allegations of paragraph 110 except the referenced amendments speak for themselves.

111. Defendants deny the allegations of paragraph 111 except the referenced amendments speak for themselves.

112. Defendants deny the allegations of paragraph 112 except the referenced amendments speak for themselves.

113. Defendants deny the allegations of paragraph 113 except the referenced amendments speak for themselves.

114. Defendants deny the allegations of paragraph 114 except the referenced amendments speak for themselves.

115. Defendants deny the allegations of paragraph 115 except the referenced amendments speak for themselves.

116. Defendants admit the allegations contained in paragraph 116.

117. Defendants deny the allegations of paragraph 117 except the referenced amendments speak for themselves.

118. Defendants deny the allegations of paragraph 118 except the referenced amendments speak for themselves.

119. Defendants admit the allegations of paragraph 119.

120. Defendants deny the allegations of paragraph 120 except the referenced

amendments speak for themselves.

121. Defendants deny the allegations of paragraph 121 except the referenced amendments speak for themselves.

122. Defendants deny the allegations of paragraph 122 except the referenced amendments speak for themselves.

123. Defendants admit the allegations of paragraph 123.

124. Defendants deny the allegations of paragraph 124 except the referenced amendments speak for themselves.

125. Defendants deny the allegations of paragraph 125 except the referenced amendments speak for themselves.

126. Defendants deny the allegations of paragraph 126 except the referenced amendments speak for themselves.

127. Defendants deny the allegations of paragraph 127 except the referenced amendments speak for themselves.

128. Defendants deny the allegations of paragraph 128 except the referenced amendments speak for themselves.

129. Defendants deny the allegations of paragraph 129 except the referenced amendments speak for themselves.

130. Defendants deny the allegations of paragraph 130 except the referenced amendments speak for themselves.

131. Defendants deny the allegations of paragraph 131 except the referenced amendments speak for themselves.

132. Defendants admit the allegations of paragraph 132.

133. Defendants deny the allegations of paragraph 133 except the referenced amendments speak for themselves.

134. Defendants admit the allegations of paragraph 134.

135. Defendants deny the allegations of paragraph 135 except the referenced amendments speak for themselves.

136. Defendants deny the allegations of paragraph 136 except the referenced amendments speak for themselves.

137. Defendants deny the allegations of paragraph 137 except the referenced amendments speak for themselves.

138. Defendants admit the allegations of paragraph 138.

139. Defendants deny the allegations of paragraph 139 except the referenced amendments speak for themselves.

140. Defendants deny the allegations of paragraph 140 except the referenced amendments speak for themselves.

141. Defendants deny the allegations of paragraph 141 except the referenced amendments speak for themselves.

142. Defendants deny the allegations of paragraph 142 except the referenced amendments speak for themselves.

143. Defendants deny the allegations of paragraph 143 except the referenced amendments speak for themselves.

144. Defendants deny the allegations of paragraph 144 except the referenced

statutes speak for themselves.

145. Defendants deny the allegations of paragraph 145 except the referenced statutes and amendments speak for themselves.

146. Defendants deny the allegations of paragraph 146 except the referenced statutes and amendments speak for themselves.

147. Defendants deny the allegations of paragraph 147.

148. Defendants deny the allegations of paragraph 148.

149. Defendants deny the allegations of paragraph 149.

150. Defendants deny the allegations of paragraph 150 except the cited code section and related code sections speak for themselves.

151. Defendants deny the allegations contained in paragraph 151.

152. Defendants deny the allegations of paragraph 152.

153. Defendants deny the allegations of paragraph 153.

154. Defendants deny the allegations of paragraph 154 except the referenced code sections speak for themselves.

155. Defendants deny the allegations of paragraph 155 except the referenced code sections speak for themselves.

156. Defendants deny the allegations of paragraph 156 except the referenced code sections speak for themselves.

157. Defendants deny the allegations of paragraph 157 except the referenced code sections speak for themselves.

158. Defendants deny the allegations of paragraph 158 except the referenced

code section speaks for itself.

159. Defendants deny the allegations of paragraph 159 except the referenced code section speaks for itself.

160. Defendants deny the allegations of paragraph 160 except the referenced code section speaks for itself.

161. Defendants deny the allegations of paragraph 161.

162. Defendants deny the allegations of paragraph 162.

163. Defendants deny the allegations of paragraph 163.

164. Defendants deny the allegations of paragraph 164.

165. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 165 and therefore deny the same.

166. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 166 and therefore deny the same.

167. Defendants deny the allegations of paragraph 167 except the statutes speak for themselves.

168. Defendants deny the allegations of paragraph 168 except the cited code section speaks for itself.

169. Defendants deny the allegations of paragraph 169 except the cited code section speaks for itself.

170. Defendants deny the allegations of paragraph 170.

171. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 171 and therefore deny the same.

172. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 172 and therefore deny the same.

173. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 173 and therefore deny the same.

174. Defendants deny the allegations of paragraph 174 except the cited code section speaks for itself.

175. Defendants deny the allegations of paragraph 175.

176. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 176 and therefore deny the same.

177. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 177 and therefore deny the same.

178. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 178 and therefore deny the same.

179. Defendants deny the allegations of paragraph 179 except the cited code section speaks for itself.

180. Defendants deny the allegations of paragraph 180 except the cited code sections speak for themselves.

181. Defendants deny the allegations of paragraph 181 except the cited code section speaks for itself.

182. Defendants deny the allegations of paragraph 182.

183. Defendants deny the allegations of paragraph 183 except the relevant code sections speak for themselves.

184. Defendants deny the allegations of paragraph 184 except the relevant code sections speak for themselves.

185. Defendants deny the allegations of paragraph 185.

186. Defendants deny the allegations of paragraph 186 except the act speaks for itself.

187. Defendants deny the allegations of paragraph 187 except the cited code section speaks for itself.

188. Defendants deny the allegations of paragraph 188.

189. Defendants deny the allegations of paragraph 189 except the act speaks for itself.

190. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 190 and therefore deny the same.

191. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 191 and therefore deny the same.

192. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 192 and therefore deny the same.

193. Defendants lack sufficient information to form a belief regarding the truth of the allegations of paragraph 193 and therefore deny the same.

194. Defendants deny the allegations of paragraph 194.

195. Defendants deny the allegations of paragraph 195 except the registry posts the information required to be posted by the act.

196. Defendants deny the allegations of paragraph 196.

197. Defendants deny the allegations of paragraph 197.

198. Defendants deny the allegations of paragraph 198 except the cited code section speaks for itself.

199. Defendants deny the allegations of paragraph 199 except the act speaks for itself.

200. Defendants deny the allegations of paragraph 200.

201. Defendants deny the allegations of paragraph 201.

202. Paragraph 202 contains no factual assertions to admit or deny and no response is required.

203. Responding to the allegations in paragraph 203, Defendants admit that the Plaintiffs assert that their claims are brought against Defendants in their official capacities, but deny that Plaintiffs are entitled to relief.

204. Defendants deny the allegations of paragraph 204.

205. Defendants deny the allegations of paragraph 205.

206. Defendants deny the allegations of paragraph 206.

207. Defendants deny the allegations of paragraph 207.

208. Defendants deny the allegations of paragraph 208.

209. Defendants deny the allegations of paragraph 209.

210. Defendants deny the allegations of paragraph 210.

211. Responding to paragraph 211, Defendants admit the allegation that they act under color of state law and deny the balance of the paragraph.

212. Paragraph 212 is a statement of the scope of Plaintiffs' claims in this

litigation and Defendants admit that allegation insofar as it is limited to such statement of the scope of Plaintiffs claims.

213. Defendants deny the allegations of paragraph 213.

214. Paragraph 214 contains no factual assertions to admit or deny and no response is required.

215. Responding to paragraph 215, Defendants admit that Plaintiffs' claims are limited to Defendants' official capacity.

216. Defendants deny the allegations of paragraph 216.

217. Defendants deny the allegations of paragraph 217.

218. Defendants deny the allegations of paragraph 218.

219. Responding to paragraph 219, Defendants admit the allegation that they act under color of state law and deny the balance of the paragraph.

220. Paragraph 220 is a statement of the scope of Plaintiffs' claims in this litigation and Defendants admit that allegation insofar as it is limited to such statement of the scope of Plaintiffs' claims.

221. Defendants deny the allegations of paragraph 221.

222. Paragraph 222 contains no factual assertions to admit or deny and no response is required.

223. Responding to paragraph 223, Defendants admit that Plaintiffs' claims are limited to Defendants' official capacity.

224. Defendants deny the allegations of paragraph 224.

225. Defendants deny the allegations of paragraph 225.

226. Defendants deny the allegations of paragraph 226.

227. Defendants deny the allegations of paragraph 227.

228. Paragraph 228 is a statement of the scope of Plaintiffs' claims in this litigation and Defendants admit that allegation insofar as it is limited to such statement of the scope of Plaintiffs' claims.

AFFIRMATIVE AND OTHER DEFENSES

FIRST AFFIRMATIVE DEFENSE

The Complaint fails to state a claim upon which relief may be granted.

SECOND AFFIRMATIVE DEFENSE

Plaintiffs lack standing.

THIRD AFFIRMATIVE DEFENSE

Plaintiffs' claims are unripe.

FOURTH AFFIRMATIVE DEFENSE

Plaintiffs' claims based on conduct that occurred more than two years prior to the filing of their initial complaint are barred by the statute of limitations.

PRAYER FOR RELIEF

Respondents demand judgment and pray for relief as follows:

1. That Plaintiffs' complaint be dismissed and that the Plaintiffs take nothing thereby;
2. For any other relief that the Court deems just and equitable under the circumstances of this action.

DATED: September 1, 2023.

STATE OF IDAHO
OFFICE OF THE ATTORNEY GENERAL

By: /s/ Timothy Longfield
TIMOTHY LONGFIELD
Deputy Attorney General

Attorneys for Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 1, 2023, I filed the foregoing electronically through the CM/ECF system, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

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