

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

CAMPAIGN LEGAL CENTER,)	
)	
)	
Plaintiff,)	
v.)	Case No. 18-cv-1187 (TSC)
)	
U.S. DEPARTMENT OF JUSTICE,)	
)	
)	
Defendant.)	
_____)	

ANSWER

Defendant, the United States Department of Justice (“Justice”), by and through the undersigned counsel, hereby answers the Complaint in the above-captioned action using the same paragraph numeration. Any allegation not specifically admitted herein is denied.

1. Paragraph 1 contains a conclusion of law to which no response is required. To the extent a response may be deemed required, Defendant admits that Plaintiff’s action purports to allege a claim under the Freedom of Information Act (“FOIA”).

JURISDICTION AND VENUE

2. Paragraph 2 contains conclusions of law to which no response is required. To the extent a response is deemed required, Defendant admits this Court has jurisdiction, subject to the terms and conditions of the FOIA, that this Court has personal jurisdiction over Defendant, and that this Court is a proper venue for actions under the FOIA.

PARTIES

3. This paragraph sets forth Plaintiff’s characterizations and opinions regarding its organization and mission to which no response is required. To the extent a response is deemed

required, Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 3.

4. Defendant admits the allegations in Paragraph 4.

STATEMENT OF FACTS

5. Defendant admits Plaintiff sent a FOIA request dated February 1, 2018, to the Civil Rights Division, Freedom of Information/Privacy Act (“FOI/PA”) Branch.

6. Defendant admits the FOIA request was seeking access to records described in paragraph 6 of the Complaint.

7. Defendant admits the FOIA request was seeking expedited processing as described in paragraph 7 of the Complaint.

8. Defendant admits the Civil Rights Division, FOI/PA Branch, received the FOIA request on February 1, 2018, assigned the request FOI/PA No. 18-00145-F, and sent an acknowledgment letter the same day. Defendant admits it forwarded a letter to Plaintiff dated February 28, 2018, and respectfully refers the Court to the response letter for a complete and accurate statement of its contents.

9. Defendant admits that the Chief of the FOIA/PA Branch spoke to Ms. Lang on or around March 22, 2018.

10. Defendant admits Plaintiff forwarded an appeal to OIP dated March 27, 2018, and respectfully refers the Court to the response letter for a complete and accurate statement of its contents.

11. Defendant denies the allegations in the first sentence of Paragraph 11. The second sentence of Paragraph 11 contains conclusions of law to which no response is required. To the

extent a response may be deemed required, Defendant denies the allegations in the second sentence.

12. Paragraph 12 contains conclusions of law to which no response is required. Defendant denies any characterizations of the cited legal decision, which speaks for itself, and respectfully refers the Court to the cited decision for a complete and accurate statement of its contents.

13. The allegations in the first sentence of Paragraph 13 contain a conclusion of law to which no response is required. As to the second sentence, Defendant admits that Plaintiff requested production of a *Vaughn* index in its administrative appeal.

14. Defendant admits the allegations in Paragraph 14.

15. Defendant denies the allegations in Paragraph 15 and avers that Defendant sent a letter dated June 7, 2018, to Plaintiff stating that Defendant was closing the administrative appeal.

16. Paragraph 16 contains conclusions of law to which no response is required. Defendant denies any characterizations of the cited statutory provision, which speaks for itself, and respectfully refers the Court to the cited provision for a complete and accurate statement of its contents.

17. Paragraph 17 contains conclusions of law to which no response is required. Defendant denies any characterizations of the cited statutory provision, which speaks for itself, and respectfully refers the Court to the cited provision for a complete and accurate statement of its contents.

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