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Attorney for Defendants

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

THE DOWNTOWN SOUP KITCHEN, d/b/a,)
DOWNTOWN HOPE CENTER,)

Plaintiff,)

vs.)

MUNICIPALITY OF ANCHORAGE,)
ANCHORAGE EQUAL RIGHTS)
COMMISSION, and PAMELA BASLER,)
Individually and in her Official Capacity as)
the Executive Director of the Anchorage)
Equal Rights Commission,)

Defendants.)

Case No. 3:18-cv-00190-SLG

MUNICIPAL DEFENDANTS' ANSWER TO COMPLAINT

Defendants Municipality of Anchorage ("MOA"), the Anchorage Equal Rights Commission ("Commission"), and Pamela Basler, Individually and in her Official Capacity as the Executive Director of the Anchorage Equal Rights Commission (collectively "Municipal Defendants"), by and through the Municipal Attorney's Office,

185. Municipal Defendants lack knowledge or information sufficient to form a belief as to the truth or falsity of the allegation of paragraph 185 of Plaintiff's Complaint.

186. Paragraph 186 contains a legal conclusion, to which no response is required. To the extent a response is required, Municipal Defendants only admit that a fact finding conference occurred.

Fact Finding Conference

187. Municipal Defendants admit the allegations contained in paragraph 187 of Plaintiff's Complaint.

188. Municipal Defendants admit the allegations contained in paragraph 188 of Plaintiff's Complaint.

189. Municipal Defendants admit the allegations contained in paragraph 189 of Plaintiff's Complaint.

190. Municipal Defendants lack knowledge or information sufficient to form a belief as to the truth or falsity of the allegation of paragraph 190 of Plaintiff's Complaint.

191. Municipal Defendants lack knowledge or information sufficient to form a belief as to the truth or falsity of the allegation of paragraph 191 of Plaintiff's Complaint. However, all attorneys and parties present at the 7/9/18 Fact Finding Conference were given a copy of the 12/15/17 Memorandum of Agreement (MOA) entered into between Plaintiff and Catholic Social Services (CSS) and encouraged to review underlying contract documents between CSS and the Municipality of Anchorage and HUD Final Rule published 9/21/2016 regarding "Equal Access in Accordance With an Individual's Gender Identity in Community Planning and Development Programs".

REQUEST FOR RELIEF

WHEREFORE Municipal Defendants respectfully request relief as follows:

- A. For judgment in favor of Municipal Defendants and against Plaintiff dismissing this action with prejudice;
- B. For judgment awarding Municipal Defendants their costs and attorney's fees incurred in this action; and
- C. For such other relief as this court deems just and equitable.

Respectfully submitted this 17th day of October, 2018.

REBECCA A. WINDT PEARSON
Municipal Attorney

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CERTIFICATE OF SERVICE

I certify that on 10/17/2018, a copy of the
Foregoing document was served on the following:

Jonathan A. Scruggs
Ryan J. Tucker
Sonja Redmond
Kevin Clarkson

by electronic means through the ECF system as
indicated on the Notice of Electronic Filing.

/s/ Marie Stafford
Legal Secretary