

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

JANE DOE I, *et al.*, )  
 )  
 Plaintiffs, )  
 ) Case No.:4:08-cv-1518-CEJ  
 v. )  
 )  
 JEREMIAH W. NIXON, *et al.*, )  
 )  
 Defendants. )

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**ANSWER**

In response to the allegations of plaintiffs' First Amended Complaint, defendant O'Connor states:

1. Defendant O'Connor lacks knowledge or information sufficient to form a belief as to the truth of this allegation and therefore denies same.
2. Defendant O'Connor admits the truth of this allegation.
3. Defendant O'Connor denies that the statute is unclear and further lacks knowledge or information sufficient to form a belief as to the truth of the remainder of this allegation and therefore denies same.
4. Defendant O'Connor admits the truth of this allegation.
5. Defendant O'Connor submits that this allegation consists of a legal conclusion about which defendant lacks sufficient knowledge or information and therefore denies same.
6. Defendant O'Connor submits that this allegation consists of a legal conclusion about which defendant lacks sufficient knowledge or information and therefore denies same.
7. Defendant O'Connor submits that this allegation consists of a legal conclusion about which defendant lacks sufficient knowledge or information and therefore denies same.

8. Defendant O'Connor lacks knowledge or information sufficient to form a belief as to the truth of this allegation and therefore denies same.

9. Defendant O'Connor lacks knowledge or information sufficient to form a belief as to the truth of this allegation and therefore denies same.

10. Defendant O'Connor lacks knowledge or information sufficient to form a belief as to the truth of this allegation and therefore denies same.

11. Defendant O'Connor lacks knowledge or information sufficient to form a belief as to the truth of this allegation and therefore denies same.

12. Defendant O'Connor lacks knowledge or information sufficient to form a belief as to the truth of this allegation and therefore denies same.

13. Defendant O'Connor lacks knowledge or information sufficient to form a belief as to the truth of this allegation and therefore denies same.

14. Defendant O'Connor lacks knowledge or information sufficient to form a belief as to the truth of this allegation and therefore denies same.

15. Defendant O'Connor admits the truth of this allegation.

16. Defendant O'Connor admits the truth of this allegation.

17. Defendant O'Connor admits the truth of this allegation.

18. Defendant O'Connor lacks knowledge or information sufficient to form a belief as to the truth of this allegation and therefore denies same.

19. Defendant O'Connor lacks knowledge or information sufficient to form a belief as to the truth of this allegation and therefore denies same.

20. Defendant O'Connor lacks knowledge or information sufficient to form a belief as to the truth of this allegation and therefore denies same.

21. Defendant O'Connor lacks knowledge or information sufficient to form a belief as to the truth of this allegation and therefore denies same.

22. Defendant O'Connor admits the truth of this allegation.

23. Defendant O'Connor lacks knowledge or information sufficient to form a belief as to the truth of this allegation and therefore denies same.

24. Defendant O'Connor lacks knowledge or information sufficient to form a belief as to the truth of this allegation and therefore denies same.

25. Defendant O'Connor lacks knowledge or information sufficient to form a belief as to the truth of this allegation and therefore denies same.

26. Defendant O'Connor lacks knowledge or information sufficient to form a belief as to the truth of this allegation and therefore denies same.

27. Defendant O'Connor lacks knowledge or information sufficient to form a belief as to the truth of this allegation and therefore denies same.

28. Defendant O'Connor lacks knowledge or information sufficient to form a belief as to the truth of this allegation and therefore denies same.

29. Defendant O'Connor lacks knowledge or information sufficient to form a belief as to the truth of this allegation and therefore denies same.

30. Defendant O'Connor lacks knowledge or information sufficient to form a belief as to the truth of this allegation and therefore denies same.

31. Defendant O'Connor lacks knowledge or information sufficient to form a belief as to the truth of this allegation and therefore denies same.

32. Defendant O'Connor admits the truth of this allegation.

## COUNT I

### *Violation of Due Process Clause of the Fourteenth Amendment –Inadequate Notice*

33. Defendant O'Connor incorporates each of the answers contained in paragraphs 1-32 as if each were set forth herein.

34. Defendant O'Connor denies this allegation.

35. Defendant O'Connor denies this allegation.

36. Defendant O'Connor denies this allegation.

37. Defendant O'Connor denies this allegation.

38. Defendant O'Connor denies this allegation.

## COUNT II

### *Violation of Ex Post Facto Clause, U.S. Const. Art. I, Sec. 10*

39. Defendant O'Connor incorporates each of the answers contained in paragraphs 1-32 as if each were set forth herein.

40. Defendant O'Connor denies this allegation.

## COUNT III

### *Violation of First Amendment – Interference with Family Association*

41. Defendant O'Connor incorporates each of the answers contained in paragraphs 1-32 as if each were set forth herein.

42. Defendant O'Connor denies this allegation.

## COUNT IV

### *Violation of Fifth Amendment – Privilege against Self-Incrimination*

43. Defendant O'Connor incorporates each of the answers contained in paragraphs 1-32 as if each were set forth herein.

44. Defendant O'Connor denies this allegation.

**COUNT V**

***Violation of Fourteenth Amendment – Right to Travel***

45. Defendant O'Connor incorporates each of the answers contained in paragraphs 1-32 as if each were set forth herein.

46. Defendant O'Connor denies this allegation.

**COUNT VI**

***Violation of Missouri Constitution, Art. 1, § 13***

47. Defendant O'Connor incorporates each of the answers contained in paragraphs 1-32 as if each were set forth herein.

48. Defendant O'Connor admits the truth of this allegation.

49. Defendant O'Connor admits the truth of this allegation.

49(i). Defendant O'Connor denies this allegation.

50. Defendant O'Connor lacks knowledge or information sufficient to form a belief as to the truth of this allegation and therefore denies same.

Respectfully submitted,

/s/ Howard Paperner

Howard Paperner - #49261

Attorney for Maryland Heights Police Department

9322 Manchester Road

St. Louis, MO 63119

(314) 961-0097, Ext. 13

(314) 961-0667, Fax

[howardpaperner@sbcglobal.net](mailto:howardpaperner@sbcglobal.net)

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and accurate copy of the foregoing was filed via the Court's CM/ECF electronic system on this 7<sup>th</sup> day of November, 2008 to:

Mr. Anthony E. Rothert  
454 Whittier Street  
St. Louis, MO 63108  
tony@aclu-em.org  
ATTORNEY FOR PLAINTIFFS

Mr. David C. Nelson  
Nelson and Nelson  
420 N. High Street  
P.O. Box Y  
Belleville, IL 62222  
[dnelson@nelsonlawpc.com](mailto:dnelson@nelsonlawpc.com)  
ATTORNEY FOR PLAINTIFFS

Mr. Robert E. Jones  
Mr. Adam R. Lorenz  
Jones & Haywood  
7700 Bonhomme, Ste. 200  
St. Louis, MO 63105  
[rejones@jhbkj.com](mailto:rejones@jhbkj.com)  
[alorenz@jhbkj.com](mailto:alorenz@jhbkj.com)  
ATTORNEYS FOR DEFENDANTSCHICKER

Christopher J. Quinn  
Attorney General of Missouri  
P.O. Box 861  
St. Louis, MO 63188  
[Christopher.Quinn@ago.mo.gov](mailto:Christopher.Quinn@ago.mo.gov)  
ATTORNEY FOR DEFENDANTS NIXON AND BLUNT

Lorena V. Merklin von Kaenel  
St. Louis County Counselor's Office  
41 S. Central Avenue  
Clayton, MO 63105  
[lmerklinvonkaenel@stlouisco.com](mailto:lmerklinvonkaenel@stlouisco.com)  
ATTORNEY FOR DEFENDANT McCULLOCH

Harry Morley Swingle  
Office of the Prosecuting Attorney  
100 Court Street  
Jackson, MO 63755  
[hmswingle@capecounty.us](mailto:hmswingle@capecounty.us)

ATTORNEY FOR DEFENDANT SCHICKER

The foregoing was served via U.S. postal service, postage prepaid, on this 7<sup>th</sup> day of November, 2008, to:

Carl A. Kinnison  
Cape Girardeau Police Department  
40 South Sprigg Street  
Cape Girardeau, MO 63703

Mark Fisher  
Office of the Prosecuting Attorney  
115 West Main Street  
Bowling Green, MO 63334

Steven Cruise  
Bowling Green Police Department  
15 W. Church Street  
Bowling Green, MO 63334

/s/ Howard Paperner  
Attorney for Maryland Heights Police Department