

IN THE IOWA DISTRICT COURT FOR POLK COUNTY

<p>EERIEANNA GOOD,</p> <p>Petitioner,</p> <p>v.</p> <p>IOWA DEPARTMENT OF HUMAN SERVICES,</p> <p>Respondent.</p>	<p>NO: CVCV054956</p> <p>RESPONDENT'S ANSWER TO PETITION FOR JUDICIAL REVIEW</p>
--	--

Respondent, the Iowa Department of Human Service (the “Department”), by and through its counsel of record, hereby answers Petitioner’s, Eerieanna Good’s, Petition for Judicial Review (the “Petition”) and states as follows:

1. No factual allegation requiring admission or denial is alleged in paragraph 1 of the Petition.
2. Denied.
3. Admit.
4. Denied on the basis that the regulation at issue speaks for itself.
5. Denied on the basis that the proposed and final decisions speak for themselves.
6. Denied.
7. Denied.
8. Denied.

9. Denied.

10. Admit.

11. Admit.

12. Admit.

13. Admit.

14. Admit.

15. Admit.

16. Admit.

17. Denied. However, the allegations in paragraph 17 of the Petition were true for the times at issue in the Petition.

18. Denied. However, the allegations in paragraph 18 of the Petition were true for the times at issue in the Petition.

19. Admit.

20. Admit.

21. Admit.

22. Admit.

23. Admit.

24. Admit.

25. Admit.

26. Admit.

27. Respondent admits that the Petition is ripe for judicial review.

Respondent denies the remainder of the allegations in paragraph 27 of the Petition.

28. Admit.

29. Admit.

30. Admit.

31. Denied on the basis that the court's opinion can speak for itself.

32. Denied on the basis that the court's opinion can speak for itself.

33. Denied on the basis that the court's opinion can speak for itself.

34. Admit.

35. Admit.

36. Admit.

37. Denied on the basis that the regulation can speak for itself.

38. Denied on the basis that the regulation can speak for itself.

39. Denied on the basis that the court's opinion can speak for itself.

40. Denied on the basis that the court's opinion can speak for itself.

41. Denied on the basis that the court's opinion can speak for itself.

42. Admit.

43. Admit.

44. Admit.

45. Admit.

46. Denied for lack of information.

47. Admit.
48. Admit.
49. Admit.
50. Admit.
51. Admit.
52. Denied on the basis that the cited document can speak for itself.
53. Admit.
54. Denied for lack of information.
55. Admit.
56. Denied.
57. Denied.
58. Denied for lack of information.
59. Denied for lack of information.
60. Admit.
61. Admit.
62. Admit.
63. Denied on the basis that the cited document can speak for itself.
64. Denied for lack of information.
65. Denied for lack of information.
66. Denied.
67. Admit.

68. Denied on the basis that the cited documents can speak for itself.
69. Admit.
70. Admit.
71. Admit.
72. Admit.
73. Admit.
74. Denied for lack of information.
75. Admit.
76. Denied for lack of information.
77. Admit.
78. Admit.
79. Denied for lack of information..
80. Admit.
81. Admit.
82. Denied on the basis that the affidavit can speak for itself.
83. Denied on the basis that the affidavit can speak for itself.
84. Admit.
85. Admit.
86. Denied on the basis that the affidavit can speak for itself.
87. Admit.
88. Admit.

89. Admit.
90. Denied on the basis that the affidavit can speak for itself.
91. Admit.
92. Admit.
93. Denied on the basis that the affidavit can speak for itself.
94. Admit.
95. Admit.
96. Admit.
97. Admit.
98. Admit.
99. Admit.
100. Admit.
101. Admit.
102. Admit.
103. Admit.
104. Admit.
105. Admit.
106. Admit.
107. Admit.
108. Admit.
109. Admit.

110. Admit.

111. Admit.

112. Admit.

113. Admit.

114. Admit.

115. No factual allegation requiring admission or denial is alleged in paragraph 115 of the Petition.

116. No factual allegation requiring admission or denial is alleged in paragraph 116 of the Petition.

117. Denied.

118. No factual allegation requiring admission or denial is alleged in paragraph 118 of the Petition.

119. No factual allegation requiring admission or denial is alleged in paragraph 119 of the Petition.

120. Denied.

121. No factual allegation requiring admission or denial is alleged in paragraph 121 of the Petition.

122. No factual allegation requiring admission or denial is alleged in paragraph 122 of the Petition.

123. Denied.

124. No factual allegation requiring admission or denial is alleged in paragraph 124 of the Petition.

125. Denied.

126. Denied.

127. Denied.

128. No factual allegation requiring admission or denial is alleged in paragraph 128 of the Petition.

129. No factual allegation requiring admission or denial is alleged in paragraph 129 of the Petition.

130. No factual allegation requiring admission or denial is alleged in paragraph 130 of the Petition.

131. No factual allegation requiring admission or denial is alleged in paragraph 131 of the Petition.

132. No factual allegation requiring admission or denial is alleged in paragraph 132 of the Petition.

133. No factual allegation requiring admission or denial is alleged in paragraph 133 of the Petition.

134. Denied.

135. Denied on the basis that the regulation can speak for itself.

136. Denied.

137. Denied.

138. Denied.

139. Admit.

140. Denied.

141. Denied.

142. Denied.

143. Denied.

144. Denied.

145. No factual allegation requiring admission or denial is alleged in paragraph 145 of the Petition.

146. No factual allegation requiring admission or denial is alleged in paragraph 146 of the Petition.

147. No factual allegation requiring admission or denial is alleged in paragraph 147 of the Petition.

148. Admit.

149. Denied.

150. Denied.

151. Denied.

152. No factual allegation requiring admission or denial is alleged in paragraph 152 of the Petition.

153. No factual allegation requiring admission or denial is alleged in paragraph 153 of the Petition.

154. Denied

155. Denied.

156. No factual allegation requiring admission or denial is alleged in paragraph 156 of the Petition.

157. No factual allegation requiring admission or denial is alleged in paragraph 157 of the Petition.

158. No factual allegation requiring admission or denial is alleged in paragraph 158 of the Petition.

159. No factual allegation requiring admission or denial is alleged in paragraph 159 of the Petition.

160. Denied.

161. Denied.

162. No factual allegation requiring admission or denial is alleged in paragraph 162 of the Petition.

The relief requested is resisted and any claimed entitlement therein denied.

Respectfully submitted,

THOMAS J. MILLER
Attorney General of Iowa

/s/ Matthew K. Gillespie
MATTHEW K. GILLESPIE AT0013513
Assistant Attorney General

Iowa Department of Justice
1305 E. Walnut St., Second Floor
Des Moines, IA 50319-0109
Phone: (515) 281-4672/Fax: (515) 281-7219
Email: Matthew.Gillespie@ag.iowa.gov

/s/ John McCormally
JOHN MCCORMALLY **AT0009602**
Assistant Attorney General
Iowa Department of Justice
1305 E. Walnut St., Second Floor
Des Moines, IA 50319-0109
Phone: (515) 281-6780/Fax: (515) 281-7219
Email: John.McCormally@ag.iowa.gov
ATTORNEYS FOR RESPONDENT,
IOWA DEPARTMENT OF HUMAN
SERVICES

*Original electronically filed via EDMS.
Electronically served on parties of record.*

PROOF OF SERVICE	
The undersigned certifies that the foregoing instrument was served upon each of the persons identified as receiving a copy by delivery in the following manner on this 4 th day of December, 2017:	
<input type="checkbox"/> U.S. Mail	<input type="checkbox"/> Hand Delivery
<input type="checkbox"/> Federal Express	<input type="checkbox"/> Other
<input checked="" type="checkbox"/> ECF System Participant (Electronic Service)	
Signature: <i>/s/ Cindy Jacobs</i>	