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4. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391(b)(1) and (b)(2), in that Defendant resides in this judicial district, and all the events giving rise to this complaint occurred in this judicial district.

DEFENDANT

5. Defendant, Mary Susan Pine, is a regular and vocal anti-abortion protester at the Presidential Women's Center, located at 100 Northpoint Parkway in West Palm Beach, Florida.

6. On information and belief, Defendant resides in West Palm Beach, Florida.

FACTUAL BACKGROUND

7. The Presidential Women's Center provides women's reproductive healthcare services.

8. Defendant has engaged in anti-abortion protest activity outside the Presidential Women's Center for several years.

9. Defendant is one of two protesters who typically conducts her protest activity on the south side of Northpoint Parkway, which includes walking back and forth in the Presidential Women's Center's driveway.

10. On November 19, 2009, Defendant physically obstructed a car by stepping in front of the car as it was attempting to enter the driveway to the Presidential Women's Center to access the parking lot.

11. The driver of the approaching car stopped to avoid striking Defendant.

12. Defendant attempted to, and did, interfere with the driver's access to the Presidential Women's Center.

CAUSE OF ACTION UNDER 18 U.S.C. § 248

13. The United States incorporates herein the averments of paragraphs 1 through 12 hereof.

14. Defendant's conduct as described in paragraphs 10 through 12 hereof constitute a physical obstruction which interfered with a person who had been seeking reproductive health services.

15. On information and belief, unless Defendant is restrained by this Court, Defendant will continue to engage in the illegal conduct averred herein.

16. The United States Attorney General is authorized under 18 U.S.C. § 248(c)(2)(B) to seek and obtain temporary, preliminary, and/or permanent injunctive relief from this Court for Defendant's violation of FACE.

17. The United States Attorney General is further authorized under 18 U.S.C. § 248(c)(2)(B)(i) to assess a civil penalty against a respondent no greater than \$10,000.00 for a nonviolent physical obstruction.

WHEREFORE, the United States Attorney General respectfully requests judgment in his favor and against Defendant, Mary Susan Pine, in the form of:

- A. An Order prohibiting Defendant, Mary Susan Pine, from entering any driveway leading into the Presidential Women's Center parking lot;

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- B. An Order prohibiting Defendant, Mary Susan Pine, and her representatives, agents, employees and any others acting in concert or participation with her, from violating the Freedom of Access to Clinic Entrances Act; and
- C. A civil penalty assessment in the amount of \$10,000.00.

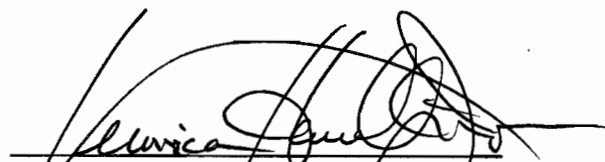
Respectfully submitted,

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