# UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF FLORIDA GAINESVILLE DIVISION

## VOTE.ORG et al.,

Plaintiffs,

v.

# CASE NO. 4:23-CV-00111-AW-MAF

CORD BYRD, in his official capacity as Secretary of State, et al.,

Defendants.

# **RON TURNER'S ANSWER TO PLAINTIFF'S AMENDED COMPLAINT**

Defendant, Ron Turner in his official capacity as Supervisor of Elections of Sarasota County, hereby answers the Plaintiff's Amended Complaint and says:

# NATURE OF THE CASE

- 1. Admitted for jurisdictional purposes only.
- 2. Admit that Florida law speaks for itself.
- 3. Admit that Florida law speaks for itself.
- 4. Admit that Florida law speaks for itself.
- 5. No response required.

# JURISDICTION AND VENUE

- 6. Admitted for jurisdictional purposes only.
- 7. Admitted for jurisdictional purposes only.
- 8. Admitted.
- 9. Admitted.
- 10. Admitted.

#### **PARTIES**

- 11. Without knowledge.
- 12. Without knowledge.
- 13. Without knowledge.
- 14. Without knowledge.
- 15. Without knowledge.
- 16. Without knowledge.
- 17. Without knowledge.
- 18. Admitted.
- 19. Admitted.
- 20. Without knowledge.
- 21. Without knowledge.
- 22. Without knowledge.
- 23. Without knowledge.
- 24. Without knowledge.
- 25. Without knowledge.
- 26. Without knowledge.
- 27. Without knowledge.
- 28. Without knowledge.
- 29. Admitted.
- 30. Admitted.

#### STATEMENT OF FACTS AND LAW

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31. Admit Florida law speaks for itself.

- 32. Admit Florida law speaks for itself.
- 33. Admit Florida law speaks for itself.
- 34. Admit Florida law speaks for itself.
- 35. Without knowledge.
- 36. Admit Florida law speaks for itself.
- 37. Admit Florida law speaks for itself.
- 38. Admit Florida law speaks for itself.
- 39. Admit Florida law speaks for itself.
- 40. Admit Florida law speaks for itself.
- 41. Admit Florida law speaks for itself.
- 42. Admit Florida law speaks for itself.
- 43. Admit Florida law speaks for itself.

# CLAIMFOR RELIEF

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- 44. Turner realleges and incorporates by reference his responses to paragraph 1 through 43.
- 45. Admit Federal law speaks for itself.
- 46. Admit Federal law speaks for itself.
- 47. Admit case law speaks for itself.
- 48. Admit case law speaks for itself.
- 49. Admit case law speaks for itself.
- 50. Admit Florida and Federal law speaks for itself.
- 51. Admit Florida law speaks for itself.
- 52. Without knowledge.

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served to all

counsel of record through the Court's CM/ECF system on this 28<sup>th</sup> day of June, 2023.

## **BENTLEY GOODRICH KISON, P.A.**

/s/ Morgan R. Bentley

# MORGAN R. BENTLEY, ESQ.

Florida Bar No. 0962287 <u>mbentley@bgk.law</u> 783 South Orange Ave., Suite 300 Sarasota, Florida 34236 Telephone: 941-556-9030 Attorney for Defendant, Ron Turner As Sarasota County Supervisor of Elections