

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF FLORIDA
TALLAHASSEE DIVISION**

Case No. 4:23-cv-00111-AW-MAF

VOTE.ORG; FLORIDA ALLIANCE
FOR RETIRED AMERICANS;
FLORIDA STATE CONFERENCE
AND BRANCHES AND YOUTH
UNITS OF THE NAACP,

Plaintiffs,

v.

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

Defendants.

**FIFTY-FOUR FLORIDA COUNTY SUPERVISORS OF ELECTIONS'
CORRECTED¹ ANSWER TO PLAINTIFFS' COMPLAINT FOR
DECLARATORY AND INJUNCTIVE RELIEF**

Defendants KIM BARTON, in her official capacity as Supervisor of Elections

¹ On Friday, 26, 2023, at 5:09 p.m., all Florida County Supervisors of Elections (except Miami-Dade and Sarasota Counties) filed their Answer to Plaintiffs' Complaint for Declaratory and Injunctive Relief. [DE 87]. In error, 11 supervisors were included in that initial Answer. After the time of filing, counsel for the following supervisors of elections requested the undersigned to file a corrected answer removing the supervisors for the following counties: Charlotte, Collier, Hillsborough, Indian River, Lake, Lee, Manatee, Marion, Monroe, Pasco, and Seminole. The only revisions made in this corrected Answer are those required to correct this error.

for Alachua County; CHRISTOPHER MILTON, in his official capacity as Supervisor of Elections for Baker County; MARK ANDERSEN, in his official capacity as Supervisor of Elections for Bay County; AMANDA SEYFANG, in her official capacity as Supervisor of Elections for Bradford County; TIM BOBANIC, in his official capacity as Supervisor of Elections for Brevard County; JOE SCOTT, in his official capacity as Supervisor of Elections for Broward County; SHARON CHASON, in her official capacity as Supervisor of Elections for Calhoun County; MAUREEN "MO" BAIRD, in her official capacity as Supervisor of Elections for Citrus County; CHRIS H. CHAMBLESS, in his official capacity as Supervisor of Elections for Clay County; TOMI STINSON BROWN, in her official capacity as Supervisor of Elections for Columbia County; MARK F. NEGLEY, in his official capacity as Supervisor of Elections for DeSoto County; STARLET CANNON, in her official capacity as Supervisor of Elections for Dixie County; MIKE HOGAN, in his official capacity as Supervisor of Elections for Duval County; DAVID H. STAFFORD, in his official capacity as Supervisor of Elections for Escambia County; KAITI LENHART, in her official capacity as Supervisor of Elections for Flagler County; HEATHER RILEY, in her official capacity as Supervisor of Elections for Franklin County; SHIRLEY G. KNIGHT, in her official capacity as Supervisor of Elections for Gadsden County; CONNIE SANCHEZ, in her official capacity as Supervisor of Elections for Gilchrist County; ALETRIS FARNAM, in

her official capacity as Supervisor of Elections for Glades County; JOHN HANLON, in his official capacity as Supervisor of Elections for Gulf County; LAURA HUTTO, in her official capacity as Supervisor of Elections for Hamilton County; DIANE SMITH, in her official capacity as Supervisor of Elections for Hardee County; BRENDA HOOTS, in her official capacity as Supervisor of Elections for Hendry County; SHIRLEY ANDERSON, in her official capacity as Supervisor of Elections for Hernando County; KAREN HEALY, in her official capacity as Supervisor of Elections for Highlands County; THERISA MEADOWS, in her official capacity as Supervisor of Elections for Holmes County; CAROL A. DUNAWAY, in her official capacity as Supervisor of Elections for Jackson County; MICHELLE MILLIGAN, in her official capacity as Supervisor of Elections for Jefferson County; TRAVIS HART, in his official capacity as Supervisor of Elections for Lafayette County; MARK S. EARLEY, in his official capacity as Supervisor of Elections for Leon County; TAMMY JONES, in her official capacity as Supervisor of Elections for Levy County; GRANT CONYERS, in his official capacity as Supervisor of Elections for Liberty County; HEATH DRIGGERS, in his official capacity as Supervisor of Elections for Madison County; VICKI DAVIS, in her official capacity as Supervisor of Elections for Martin County; JANET H. ADKINS, in her official capacity as Supervisor of Elections for Nassau County; PAUL A. LUX, in his official capacity as Supervisor of Elections for Okaloosa County; MELISSA

ARNOLD, in her official capacity as Supervisor of Elections for Okeechobee County; BILL COWLES, in his official capacity as Supervisor of Elections for Orange County; MARY JANE ARRINGTON, in her official capacity as Supervisor of Elections for Osceola County; WENDY SARTORY LINK, in her official capacity as Supervisor of Elections for Palm Beach County; JULIE MARCUS, in her official capacity as Supervisor of Elections for Pinellas County; LORI EDWARDS, in her official capacity as Supervisor of Elections for Polk County; CHARLES OVERTURF, in his official capacity as Supervisor of Elections for Putnam County; TAPPIE A. VILLANE, in her official capacity as Supervisor of Elections for Santa Rosa County; VICKY OAKES, in her official capacity as Supervisor of Elections for St. Johns County; GERTRUDE WALKER, in her official capacity as Supervisor of Elections for St. Lucie County; WILLIAM KEEN, in his official capacity as Supervisor of Elections for Sumter County; JENNIFER MUSGROVE KINSEY, in her official capacity as Supervisor of Elections for Suwannee County; DANA SOUTHERLAND, in her official capacity as Supervisor of Elections for Taylor County; DEBORAH K. OSBORNE, in her official capacity as Supervisor of Elections for Union County; LISA LEWIS, in her official capacity as in her official capacity as Supervisor of Elections for Volusia County; JOSEPH MORGAN, in his official capacity as Supervisor of Elections for Wakulla County; RYAN MESSER, in his official capacity as Supervisor of Elections for Walton County; CAROL F.

RUDD, in her official capacity as Supervisor of Elections for Washington County; (collectively, the “54 Supervisors”), pursuant to Fed. R. Civ. P. 8, hereby answer Plaintiffs’ Complaint for Declaratory and Injunctive Relief, D.E. 1 (“Complaint”), as follows:

NATURE OF THE CASE

1. As to the statutes cited, summarized, or described in Paragraph 1 of the Complaint, those statutes speak for themselves and thus no answer is required. The 54 Supervisors are without knowledge as to any other allegations and they are therefore denied.

2. Denied as framed.

3. As to the statutes or case law cited, summarized, or described in Paragraph 3 of the Complaint, the cited statutes and the case law speak for themselves and thus no answer is required. The 54 Supervisors are without knowledge as to any other allegations.

4. As to the statutes cited, summarized, or described in Paragraph 4 of the Complaint, those statutes speak for themselves and thus no answer is required. The 54 Supervisors are without knowledge as to any other allegations and they are therefore denied.

5. The 54 Supervisors are without knowledge as to the allegations in Paragraph 5 of the Complaint and they are therefore denied.

JURISDICTION AND VENUE

6. The 54 Supervisors admit that Plaintiffs have asserted claims under

the cited statutes. The 54 Supervisors are without knowledge as to the remaining allegations contained in Paragraph 6.

7. The 54 Supervisors admit Paragraph 7 for jurisdictional purposes only and denied for all others.

8. The 54 Supervisors admit Paragraph 8 for jurisdictional purposes only and denied for all others.

9. Admitted.

10. As to all statutes or rules cited, summarized, or described in Paragraph 10 of the Complaint, those statutes and rules speak for themselves and thus no answer is required. The 54 Supervisors are without knowledge as to any other allegations contained in Paragraph 10 and they are therefore denied.

PARTIES

11. The 54 Supervisors are without knowledge as to the allegations in Paragraph 11 of the Complaint and they are therefore denied.

12. The 54 Supervisors are without knowledge as to the allegations in Paragraph 12 of the Complaint and they are therefore denied.

13. The 54 Supervisors are without knowledge as to the allegations in Paragraph 13 of the Complaint and they are therefore denied.

14. The 54 Supervisors are without knowledge as to the allegations in Paragraph 14 of the Complaint and they are therefore denied.

15. The 54 Supervisors are without knowledge as to the allegations in Paragraph 15 of the Complaint and they are therefore denied.

16. The 54 Supervisors are without knowledge as to the allegations in

Paragraph 16 of the Complaint and they are therefore denied.

17. The 54 Supervisors are without knowledge as to the allegations in Paragraph 17 of the Complaint and they are therefore denied.

18. The 54 Supervisors are without knowledge as to the allegations in Paragraph 18 of the Complaint and they are therefore denied.

19. The 54 Supervisors are without knowledge as to the allegations in Paragraph 19 of the Complaint and they are therefore denied.

20. The 54 Supervisors are without knowledge as to the allegations in Paragraph 20 of the Complaint and they are therefore denied.

21. The first sentence is denied as to the 54 Supervisors and without knowledge for any other defendants. The 54 Supervisors are without knowledge as to all other allegations in Paragraph 21 of the Complaint and they are therefore denied.

22. Admitted that Defendant Cord Byrd is the Secretary of State of Florida. As to the statutes cited, summarized, or described in Paragraph 22 of the Complaint, those statutes speak for themselves and thus no answer is required. The 54 Supervisors are without knowledge as to any other allegations contained in Paragraph 22 of the Complaint and they are therefore denied.

23. The 54 Supervisors admit that Florida Supervisors of Elections are each responsible for election administration in their respective individual counties, but deny that they are the sole election administrators for each county because the Florida Division of Elections of the Department of State also has involvement in the administration of elections statewide. The 54 Supervisors also admit that Plaintiffs have identified each of the 54 Supervisors as well as the

Miami-Dade County Supervisor of Elections. As to the statutes cited, summarized, or described in Paragraph 23 of the Complaint, those statutes speak for themselves and thus no answer is required. The 54 Supervisors are without knowledge as to any other allegations contained in Paragraph 23 of the Complaint and they are therefore denied.

STATEMENT OF FACTS AND LAW

24. The 54 Supervisors are without knowledge as to the allegations contained in Paragraph 24 of the Complaint and they are therefore denied.

25. As to the statutes cited, summarized, or described in Paragraph 25 of the Complaint, those statutes speak for themselves and thus no answer is required. The 54 Supervisors are without knowledge as to any other allegations contained in Paragraph 25 and they are therefore denied.

26. As to the statutes cited, summarized, or described in Paragraph 26 of the Complaint, those statutes speak for themselves and thus no answer is required. The 54 Supervisors are without knowledge as to any other allegations contained in Paragraph 26 and they are therefore denied.

27. As to the statutes cited, summarized, or described in Paragraph 27 of the Complaint, those statutes speak for themselves and thus no answer is required. The 54 Supervisors are without knowledge as to any other allegations contained in Paragraph 27 and they are therefore denied.

28. As to the statutes cited, summarized, or described in Paragraph 28 of the Complaint, those statutes speak for themselves and thus no answer is required. The 54 Supervisors are without knowledge as to any other allegations contained

in Paragraph 28 and they are therefore denied.

29. As to the statutes cited, summarized, or described in Paragraph 29 of the Complaint, those statutes speak for themselves and thus no answer is required. The 54 Supervisors are without knowledge as to any other allegations contained in Paragraph 29 of the Complaint and they are therefore denied.

30. As to any statutes cited, summarized, or described in Paragraph 30 of the Complaint, those statutes speak for themselves and thus no answer is required. The 54 Supervisors are without knowledge as to any other allegations contained in Paragraph 30 and they are therefore denied.

31. As to the statutes or websites cited, summarized, or described in Paragraph 31 of the Complaint, those statutes and websites speak for themselves and thus no answer is required. The 54 Supervisors are without knowledge as to any other allegations contained in Paragraph 31 of the Complaint and they are therefore denied.

32. As to the statutes cited, summarized, or described in Paragraph 32 of the Complaint, those statutes speak for themselves and thus no answer is required. The 54 Supervisors are without knowledge as to any other allegations contained in Paragraph 32 of the Complaint and they are therefore denied.

33. As to any statutes or advisory opinions cited, summarized, or described in Paragraph 33 of the Complaint, those statutes and advisory opinions speak for themselves and thus no answer is required. The 54 Supervisors are without knowledge as to any other allegations contained in Paragraph 33 of the Complaint and they are therefore denied.

34. As to the websites cited, summarized, or described in Paragraph 34

of the Complaint, those websites speak for themselves and thus no answer is required. The 54 Supervisors are without knowledge as to any other allegations contained in Paragraph 34 of the Complaint and they are therefore denied.

35. As to the statutes cited, summarized, or described in Paragraph 35 of the Complaint, those statutes speak for themselves and thus no answer is required. The 54 Supervisors are without knowledge as to any other allegations contained in Paragraph 35 of the Complaint and they are therefore denied.

COUNT 1

36. The 54 Supervisors re-allege all responses to preceding paragraphs 1-35 as though fully set forth herein.

37. As to the statute cited, summarized, or described in Paragraph 37 of the Complaint, the statute speaks for itself and thus no answer is required.

38. As to the statute cited, summarized, or described in Paragraph 38 of the Complaint, the statute speaks for itself and thus no answer is required.

39. As to the case law cited, summarized, or described in Paragraph 39 of the Complaint, the case law speaks for itself and thus no answer is required.

40. As to the case law cited, summarized, or described in Paragraph 40 of the Complaint, the case law speaks for itself and thus no answer is required.

41. The 54 Supervisors deny the allegations against them in the first sentence of Paragraph 41, but they are without knowledge as to any other defendants, and thus such allegations are also denied. As to the caselaw cited, summarized, or described in the remainder of Paragraph 41 of the Complaint, the caselaw speaks for itself and thus no answer is required. The 54 Supervisors are

without knowledge as to any other allegations contained in Paragraph 41 of the Complaint and they are therefore denied.

42. As to the statutes cited, summarized, or described in Paragraph 42 of the Complaint, those statutes speak for themselves and thus no answer is required. The 54 Supervisors are without knowledge as to any other allegations contained in Paragraph 42 of the Complaint and they are therefore denied.

43. As to the statutes cited, summarized, or described in Paragraph 43 of the Complaint, those statutes speak for themselves and thus no answer is required. The 54 Supervisors are without knowledge as to any other allegations contained in Paragraph 43 of the Complaint and they are therefore denied.

44. The 54 Supervisors are without knowledge as to the allegations in Paragraph 44 of the Complaint and they are therefore denied.

Affirmative Defenses

The 54 Supervisors do not take any position regarding the substance of Plaintiffs' Complaint and have agreed with counsel for Plaintiffs that the 54 Supervisors shall have limited participation in this action and were named as defendants by Plaintiffs solely to ensure that any relief granted has statewide application. The 54 Supervisors assert as their only affirmative defense that Plaintiffs have waived and are therefore not entitled to recover attorneys' fees, expenses, and costs against the 54 Supervisors.

Should it become necessary to actively defend this action notwithstanding the agreement with counsel for Plaintiffs, whether by Court order or otherwise, the 54 Supervisors and counsel for Plaintiffs have agreed that the 54 Supervisors may

amend this answer and assert affirmative defenses.

Date: May 30, 2023

Respectfully submitted,
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CERTIFICATE OF COMPLIANCE

The undersigned certifies that the foregoing complies with the size, font, and formatting requirements of Local Rule 5.1(C).

By: /s/ Nathaniel A. Klitsberg

Nathaniel A. Klitsberg