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12 *Arizona Alliance for Retired Americans and*
Voto Latino

13 **Pro Hac Vice Application Forthcoming*

14 **ARIZONA SUPERIOR COURT**
15 **YAVAPAI COUNTY**

16 STRONG COMMUNITIES FOUNDATION)
OF ARIZONA INCORPORATED; ERIC)
17 LOVELIS; WILLIAM JOSEPH APPLETON;)
and LAURA HARRISON,)
18 Plaintiffs,)

19 v.)

20 YAVAPAI COUNTY; CRAIG L. BROWN,)
21 JAMES GREGORY, DONNA G. MICHAELS,)
MARY MALLORY, and HARRY B. OBERG,)
22 in their respective official capacities as members)
of the Yavapai County Board of Supervisors;)
23 MICHELLE M. BURCHILL, in her official)
capacity as Yavapai County Recorder;)
24 MARICOPA COUNTY; BILL GATES,)
STEVE GALLARDO, THOMAS GALVIN,)
25 CLINT HICKMAN, and JACK SELLERS, in)
their respective official capacities as members)
26 of the Maricopa County Board of Supervisors;)
STEPHEN RICHER, in his official capacity as)
27 Maricopa County Recorder; COCONINO)
COUNTY; JERÓNIMO VASQUEZ, PATRICE)
28 HORSTMAN, ADAM HESS, JUDY BEGAY,)

No. S13000V202400175

**PROPOSED] ANSWER IN
INTERVENTION TO
PLAINTIFFS'
COMPLAINT FOR
SPECIAL ACTION
RELIEF**

(Assigned to the Hon. John D.
Napper)

1 and LENA FOWLER, in their respective)
2 official capacities as members of the Coconino)
3 County Board of Supervisors; and PATTY)
4 HANSEN, in her official capacity as Coconino)
5 County Recorder,)

6 Defendants.)

7 Proposed Intervenor-Defendants Arizona Alliance for Retired Americans and Voto
8 Latino (“Proposed Intervenors”) answer Plaintiffs’ Complaint for Special Action Relief
9 (“Complaint”) as follows:

10 **INTRODUCTION**

11 1. Proposed Intervenors admit that the cited article contains the quoted language
12 and that elections must be administered consistent with the requirements of state and federal
13 law. Proposed Intervenors otherwise deny the allegations in Paragraph 1 to the extent they
14 suggest that problems with the 2022 election in Maricopa County affected the outcome.

15 2. Deny.

16 3. Deny.

17 4. Deny.

18 5. Deny.

19 6. Deny.

20 7. Deny.

21 8. Deny.

22 9. Proposed Intervenors admit that, on January 29, 2024, the American Law
23 Institute issued a report titled *Ethical Standards for Election Administration*; that Defendant
24 Bill Gates served on the report’s drafting committee; and that the cited report contains the
25 quoted language. Paragraph 9 otherwise states a legal conclusion to which no response is
26 required. To the extent a response is required, Proposed Intervenors deny the allegations.

27 10. Deny.

28 11. Deny.

12. Deny.

PARTIES

1
2 13. Proposed Intervenors lack sufficient knowledge or information to form a
3 belief as to the truth or falsity of the allegations in Paragraph 13 and therefore deny them.

4 14. Proposed Intervenors lack sufficient knowledge or information to form a
5 belief as to the truth or falsity of the allegations in Paragraph 14 and therefore deny them.

6 15. Proposed Intervenors lack sufficient knowledge or information to form a
7 belief as to the truth or falsity of the allegations in Paragraph 15 and therefore deny them.

8 16. Proposed Intervenors lack sufficient knowledge or information to form a
9 belief as to the truth or falsity of the allegations in Paragraph 16 and therefore deny them.

10 17. Paragraph 17 states legal conclusions to which no response is required. To the
11 extent a response is required, Proposed Intervenors deny the allegations to the extent they
12 suggest Yavapai County is a proper defendant in this action.

13 18. Proposed Intervenors deny that Craig L. Brown is either the chairman or a
14 member of the Maricopa County Board of Supervisors. Paragraph 18 otherwise states legal
15 conclusions to which no response is required. To the extent a response is required, Proposed
16 Intervenors admit the allegations.

17 19. Proposed Intervenors admit that Michelle M. Burchill is the Yavapai County
18 Recorder and is sued in her official capacity. Paragraph 19 otherwise states legal
19 conclusions to which no response is required. To the extent a response is required, Proposed
20 Intervenors admit the allegations.

21 20. Paragraph 20 states legal conclusions to which no response is required. To the
22 extent a response is required, Proposed Intervenors deny the allegations to the extent they
23 suggest Maricopa County is a proper defendant in this action.

24 21. Proposed Intervenors admit that Jack Sellers is the chairman of the Maricopa
25 County Board of Supervisors and that Steve Gallardo, Thomas Galvin, Clint Hickman, and
26 Bill Gates are members of the Maricopa County Board of Supervisors. Paragraph 21
27 otherwise states a legal conclusion to which no response is required. To the extent a
28 response is required, Proposed Intervenors admit the allegations.

1 22. Proposed Intervenors admit that Stephen Richer is the Maricopa County
2 Recorder. Paragraph 22 otherwise states a legal conclusion to which no response is required.
3 To the extent a response is required, Proposed Intervenors admit the allegations.

4 23. Paragraph 23 states a legal conclusion to which no response is required. To
5 the extent a response is required, Proposed Intervenors deny the allegations to the extent
6 they suggest Coconino County is a proper defendant in this action.

7 24. Proposed Intervenors admit that Jeronimo Vasquez is the chairman of the
8 Coconino County Board of Supervisors and that Patrice Horstman, Adam Hess, Judy
9 Begay, and Lena Fowler are members of the Coconino County Board of Supervisors.
10 Paragraph 24 otherwise states a legal conclusion to which no response is required. To the
11 extent a response is required, Proposed Intervenors admit the allegations.

12 25. Proposed Intervenors admit that Patty Hansen is the Coconino County
13 Recorder. Paragraph 25 otherwise states a legal conclusion to which no response is required.
14 To the extent a response is required, Proposed Intervenors admit the allegations.

JURISDICTION

15
16 26. Paragraph 26 states a legal conclusion to which no response is required. To
17 the extent a response is required, Proposed Intervenors deny the allegations.

18 27. Paragraph 27 states a legal conclusion to which no response is required. To
19 the extent a response is required, Proposed Intervenors deny the allegations.

20 28. Proposed Intervenors admit that most of the Plaintiffs previously filed a
21 similar action in Maricopa County before voluntarily dismissing it and refiled in this Court.
22 Paragraph 28 otherwise states a legal conclusion to which no response is required. To the
23 extent a response is required, and the Court finds it has jurisdiction, Proposed Intervenors
24 deny the allegations.

GENERAL ALLEGATIONS

25
26 29. Deny.

27 30. Deny.

28

1 31. Paragraph 31 states a legal conclusion to which no response is required. To
2 the extent a response is required, Proposed Intervenor admits that the cited statute contains
3 the quoted language.

4 **Chain of Custody Failures**

5 32. Paragraph 32 states a legal conclusion to which no response is required. To
6 the extent a response is required, Proposed Intervenor admits that the cited statute contains
7 the quoted language.

8 33. Paragraph 33 states a legal conclusion to which no response is required. To
9 the extent a response is required, Proposed Intervenor admits that the EPM, at different
10 sections, contains provisions relating to counting ballots and specific forms, but deny the
11 allegations to the extent they mischaracterize the EPM.

12 34. Paragraph 34 states a legal conclusion to which no response is required. To
13 the extent a response is required, Proposed Intervenor admits that the cited statute contains
14 the quoted language.

15 35. Paragraph 35 states a legal conclusion to which no response is required. To
16 the extent a response is required, Proposed Intervenor admits that the cited statute contains
17 the quoted language.

18 36. Proposed Intervenor admits that the document cited in Paragraph 36 contains
19 the quoted language.

20 37. Proposed Intervenor admits that the document cited in Paragraph 37 contains
21 the quoted language.

22 38. Proposed Intervenor admits that the document cited in Paragraph 38 contains
23 the quoted language.

24 39. Proposed Intervenor admits that the document cited in Paragraph 39 contains
25 the quoted language.

26 40. Proposed Intervenor admits that the document cited in Paragraph 40 contains
27 the quoted language.

28

1 41. Proposed Intervenor's lack sufficient knowledge or information to form a
2 belief as to the truth or falsity of the allegations in Paragraph 41 and therefore deny them.

3 42. Proposed Intervenor's lack sufficient knowledge or information to form a
4 belief as to the truth or falsity of the allegations in Paragraph 42 and therefore deny them.

5 43. Proposed Intervenor's lack sufficient knowledge or information to form a
6 belief as to the truth or falsity of the allegations in Paragraph 43 and therefore deny them.

7 44. Proposed Intervenor's lack sufficient knowledge or information to form a
8 belief as to the truth or falsity of the allegations in Paragraph 44 and therefore deny them.

9 45. Proposed Intervenor's lack sufficient knowledge or information to form a
10 belief as to the truth or falsity of the allegations in Paragraph 45 and therefore deny them.

11 46. Proposed Intervenor's lack sufficient knowledge or information to form a
12 belief as to the truth or falsity of the allegations in Paragraph 46 and therefore deny them.

13 47. Paragraph 47 states a legal conclusion to which no response is required. To
14 the extent a response is required, Proposed Intervenor's admit that the cited document
15 contains the quoted language, but otherwise deny the allegations.

16 **Reconciliation Failures**

17 48. Paragraph 48 states a legal conclusion to which no response is required. To
18 the extent a response is required, Proposed Intervenor's admit that the cited statute contains
19 the quoted language.

20 49. Paragraph 49 states a legal conclusion to which no response is required. To
21 the extent a response is required, Proposed Intervenor's admit that the cited statute contains
22 the quoted language.

23 50. Proposed Intervenor's lack sufficient knowledge or information to form a
24 belief as to the truth or falsity of the allegations in Paragraph 50 and therefore deny them.

25 51. Proposed Intervenor's admit that the document cited in Paragraph 51 contains
26 the quoted language.

27 52. Paragraph 52 states a legal conclusion to which no response is required. To
28 the extent a response is required, Proposed Intervenor's admit that the reconciliation process

1 serves to avoid tabulation errors and deter fraud, but deny the allegations to the extent they
2 suggest that a failure of reconciliation procedures led to mistakes or fraud in previous
3 Maricopa County elections.

4 53. Proposed Intervenors lack sufficient knowledge or information to form a
5 belief as to the truth or falsity of the allegations in Paragraph 53 and therefore deny them.

6 54. Proposed Intervenors lack sufficient knowledge or information to form a
7 belief as to the truth or falsity of the allegations in Paragraph 54 and therefore deny them.

8 55. Proposed Intervenors admit that the document cited in Paragraph 55 states
9 that reconciliation “is conducted at MCTEC, not in the vote center.” Proposed Intervenors
10 lack sufficient knowledge or information to form a belief as to the truth or falsity of the
11 remaining allegations in Paragraph 55 and therefore deny them.

12 56. Proposed Intervenors lack sufficient knowledge or information to form a
13 belief as to the truth or falsity of the allegations in Paragraph 56 and therefore deny them.

14 **Failure of Voting Center Printers**

15 57. Proposed Intervenors lack sufficient knowledge or information to form a
16 belief as to the truth or falsity of the allegations in the first sentence of Paragraph 57 and
17 therefore deny them. Paragraph 57 otherwise states a legal conclusion to which no response
18 is required. To the extent a response is required, Proposed Intervenors admit that the cited
19 statute contains the quoted language.

20 58. Proposed Intervenors lack sufficient knowledge or information to form a
21 belief as to the truth or falsity of the allegations in Paragraph 58 and therefore deny them.

22 59. Proposed Intervenors lack sufficient knowledge or information to form a
23 belief as to the truth or falsity of the allegations in Paragraph 59 and therefore deny them.

24 60. Proposed Intervenors lack sufficient knowledge or information to form a
25 belief as to the truth or falsity of the allegations in Paragraph 60 and therefore deny them.

26 61. Proposed Intervenors lack sufficient knowledge or information to form a
27 belief as to the truth or falsity of the allegations in Paragraph 61 and therefore deny them.

28

1 62. Proposed Intervenors admit that the email cited in Paragraph 62 references a
2 printer issue in Yavapai County that was “fixed” within five minutes of being reported, and
3 that the polling place described had a forty-five-minute wait. Proposed Intervenors lack
4 sufficient knowledge or information to form a belief as to the truth or falsity of the
5 remaining allegations in Paragraph 62 and therefore deny them.

6 63. Proposed Intervenors lack sufficient knowledge or information to form a
7 belief as to the truth or falsity of the allegations in Paragraph 63 and therefore deny them.

8 64. Proposed Intervenors lack sufficient knowledge or information to form a
9 belief as to the truth or falsity of the allegations in Paragraph 64 and therefore deny them.

10 65. Proposed Intervenors lack sufficient knowledge or information to form a
11 belief as to the truth or falsity of the allegations in Paragraph 65 and therefore deny them.

12 66. Proposed Intervenors lack sufficient knowledge or information to form a
13 belief as to the truth or falsity of the allegations in Paragraph 66 and therefore deny them.

14 67. Paragraph 67 states a legal conclusion to which no response is required. To
15 the extent a response is required, Proposed Intervenors deny the allegations.

16 **Racially Discriminatory Location of Voting Centers**

17 68. Proposed Intervenors lack sufficient knowledge or information to form a
18 belief as to the truth or falsity of the allegations in Paragraph 68 and therefore deny them.

19 69. Proposed Intervenors lack sufficient knowledge or information to form a
20 belief as to the truth or falsity of the allegations in Paragraph 69 and therefore deny them.

21 70. Paragraph 70 states a legal conclusion to which no response is required. To
22 the extent a response is required, Proposed Intervenors deny the allegations.

23 71. Proposed Intervenors lack sufficient knowledge or information to form a
24 belief as to the truth or falsity of the allegations in Paragraph 71 and therefore deny them.

25 72. Paragraph 72 states a legal conclusion to which no response is required. To
26 the extent a response is required, Proposed Intervenors deny the allegations.

27 73. Proposed Intervenors lack sufficient knowledge or information to form a
28 belief as to the truth or falsity of the allegations in Paragraph 73 and therefore deny them.

1 **Unlawful Use of Software for Signature Verification**

2 74. Paragraph 74 states a legal conclusion to which no response is required. To
3 the extent a response is required, Proposed Intervenor admits that the cited statute contains
4 the quoted language, but deny the allegations to the extent they mischaracterize the statute.

5 75. Paragraph 75 states a legal conclusion to which no response is required. To
6 the extent a response is required, Proposed Intervenor denies the allegations.

7 76. Proposed Intervenor lacks sufficient knowledge or information to form a
8 belief as to the truth or falsity of the allegations in Paragraph 76 and therefore deny them.

9 77. Proposed Intervenor admits that the email cited in Paragraph 77 contains the
10 quoted language. Proposed Intervenor lacks sufficient knowledge or information to form a
11 belief as to the truth or falsity of the remaining allegations in Paragraph 77 and therefore
12 deny them.

13 78. Proposed Intervenor lacks sufficient knowledge or information to form a
14 belief as to the truth or falsity of the allegations in Paragraph 78 and therefore deny them.

15 79. Proposed Intervenor lacks sufficient knowledge or information to form a
16 belief as to the truth or falsity of the allegations in Paragraph 79 and therefore deny them.

17 80. Proposed Intervenor lacks sufficient knowledge or information to form a
18 belief as to the truth or falsity of the allegations in Paragraph 80 and therefore deny them.

19 81. Proposed Intervenor lacks sufficient knowledge or information to form a
20 belief as to the truth or falsity of the allegations in Paragraph 81 and therefore deny them.

21 82. Proposed Intervenor lacks sufficient knowledge or information to form a
22 belief as to the truth or falsity of the allegations in Paragraph 82 and therefore deny them.

23 83. Proposed Intervenor lacks sufficient knowledge or information to form a
24 belief as to the truth or falsity of the allegations in Paragraph 83 and therefore deny them.

25 84. Proposed Intervenor lacks sufficient knowledge or information to form a
26 belief as to the truth or falsity of the allegations in Paragraph 84 and therefore deny them.

27 85. Proposed Intervenor admits that ballots are important. Paragraph 85 otherwise
28 states a legal conclusion to which no response is required. To the extent a response is

1 required, Proposed Intervenors deny the allegations.

2 86. Proposed Intervenors lack sufficient knowledge or information to form a
3 belief as to the truth or falsity of the allegations in Paragraph 86 and therefore deny them.

4 87. Proposed Intervenors admit that the documents cited in Paragraph 87 contain
5 the quoted language. Proposed Intervenors lack sufficient knowledge or information to form
6 a belief as to the truth or falsity of the remaining allegations in Paragraph 87 and therefore
7 deny them.

8 88. Proposed Intervenors lack sufficient knowledge or information to form a
9 belief as to the truth or falsity of the allegations in Paragraph 88 and therefore deny them.

10 89. Proposed Intervenors admit that the documents cited in Paragraph 89 contain
11 the quoted language. Proposed Intervenors lack sufficient knowledge or information to form
12 a belief as to the truth or falsity of the remaining allegations in Paragraph 89 and therefore
13 deny them.

14 90. Proposed Intervenors admit that the document cited in Paragraph 90 contains
15 the quoted language. Proposed Intervenors lack sufficient knowledge or information to form
16 a belief as to the truth or falsity of the remaining allegations in Paragraph 90 and therefore
17 deny them.

18 91. Proposed Intervenors lack sufficient knowledge or information to form a
19 belief as to the truth or falsity of the allegations in Paragraph 91 and therefore deny them.

20 92. Proposed Intervenors lack sufficient knowledge or information to form a
21 belief as to the truth or falsity of the allegations in Paragraph 92 and therefore deny them.

22 93. Proposed Intervenors lack sufficient knowledge or information to form a
23 belief as to the truth or falsity of the allegations in Paragraph 93 and therefore deny them.

24 94. Proposed Intervenors lack sufficient knowledge or information to form a
25 belief as to the truth or falsity of the allegations in Paragraph 94 and therefore deny them.

26 95. Proposed Intervenors admit that the contract cited in Paragraph 95 expires on
27 January 31, 2026. Proposed Intervenors lack sufficient knowledge or information to form a
28

1 belief as to the truth or falsity of the remaining allegations in Paragraph 95 and therefore
2 deny them.

3 96. Proposed Intervenors admit that the contract cited in Paragraph 96 contains
4 the quoted language. Proposed Intervenors lack sufficient knowledge or information to form
5 a belief as to the truth or falsity of the remaining allegations in Paragraph 96 and therefore
6 deny them.

7 97. Proposed Intervenors admit that the contract cited in Paragraph 97 lists the
8 fees as described. Proposed Intervenors lack sufficient knowledge or information to form a
9 belief as to the truth or falsity of the remaining allegations in Paragraph 97 and therefore
10 deny them.

11 98. Proposed Intervenors lack sufficient knowledge or information to form a
12 belief as to the truth or falsity of the allegations in Paragraph 98 and therefore deny them.

13 99. Proposed Intervenors lack sufficient knowledge or information to form a
14 belief as to the truth or falsity of the allegations in Paragraph 99 and therefore deny them.

15 **Failure to Signature Verify Ballot Affidavits**

16 100. Paragraph 100 states a legal conclusion to which no response is required. To
17 the extent a response is required, Proposed Intervenors admit the cited statute contains the
18 quoted language.

19 101. Paragraph 101 states a legal conclusion to which no response is required. To
20 the extent a response is required, Proposed Intervenors admit the cited statute contains the
21 quoted language.

22 102. Paragraph 102 states a legal conclusion to which no response is required. To
23 the extent a response is required, Proposed Intervenors admit the cited statute contains the
24 quoted language.

25 103. Paragraph 103 states a legal conclusion to which no response is required. To
26 the extent a response is required, Proposed Intervenors deny the allegations.

27 104. Admit.

28 105. Paragraph 105 states a legal conclusion to which no response is required. To

1 the extent a response is required, Proposed Intervenor deny the allegations.

2 106. Paragraph 106 states a legal conclusion to which no response is required. To
3 the extent a response is required, Proposed Intervenor deny the allegations.

4 107. Paragraph 107 states a legal conclusion to which no response is required. To
5 the extent a response is required, Proposed Intervenor deny the allegations.

6 *Voter-Assisted Ballot Affidavits*

7 108. Proposed Intervenor lack sufficient knowledge or information to form a
8 belief as to the truth or falsity of the allegations in Paragraph 108 and therefore deny them.

9 *Early Vote Center Ballot Affidavits*

10 109. Proposed Intervenor admit that the transcript cited in Paragraph 109 contains
11 the quoted language. Proposed Intervenor lack sufficient knowledge or information to form
12 a belief as to the truth or falsity of the remaining allegations in Paragraph 109 and therefore
13 deny them.

14 110. Proposed Intervenor admit that the transcript cited in Paragraph 110 contains
15 the quoted language. Proposed Intervenor lack sufficient knowledge or information to form
16 a belief as to the truth or falsity of the remaining allegations in Paragraph 110 and therefore
17 deny them.

18 111. Paragraph 111 states a legal conclusion to which no response is required. To
19 the extent a response is required, Proposed Intervenor deny the allegations.

20 112. Proposed Intervenor admit that the transcript cited in Paragraph 112 contains
21 the quoted language. Proposed Intervenor lack sufficient knowledge or information to form
22 a belief as to the truth or falsity of the remaining allegations in Paragraph 112 and therefore
23 deny them.

24 113. Proposed Intervenor admit that the transcript cited in Paragraph 113 contains
25 the quoted language. Proposed Intervenor lack sufficient knowledge or information to form
26 a belief as to the truth or falsity of the remaining allegations in Paragraph 113 and therefore
27 deny them.

28 114. Proposed Intervenor lack sufficient knowledge or information to form a

1 belief as to the truth or falsity of the allegations in Paragraph 114 and therefore deny them.

2 **Unauthorized Cancellations of Voter Registration**

3 115. Proposed Intervenors lack sufficient knowledge or information to form a
4 belief as to the truth or falsity of the allegations in Paragraph 115 and therefore deny them.

5 116. Proposed Intervenors lack sufficient knowledge or information to form a
6 belief as to the truth or falsity of the allegations in Paragraph 116 and therefore deny them.

7 117. Proposed Intervenors lack sufficient knowledge or information to form a
8 belief as to the truth or falsity of the allegations in Paragraph 117 and therefore deny them.

9 118. Proposed Intervenors lack sufficient knowledge or information to form a
10 belief as to the truth or falsity of the allegations in Paragraph 118 and therefore deny them.

11 119. Proposed Intervenors lack sufficient knowledge or information to form a
12 belief as to the truth or falsity of the allegations in Paragraph 119 and therefore deny them.

13 120. Proposed Intervenors lack sufficient knowledge or information to form a
14 belief as to the truth or falsity of the allegations in Paragraph 120 and therefore deny them.

15 121. Paragraph 121 states a legal conclusion to which no response is required. To
16 the extent a response is required, Proposed Intervenors deny the allegations.

17 122. Proposed Intervenors lack sufficient knowledge or information to form a
18 belief as to the truth or falsity of the allegations in Paragraph 122 and therefore deny them.

19 123. Proposed Intervenors lack sufficient knowledge or information to form a
20 belief as to the truth or falsity of the allegations in Paragraph 123 and therefore deny them.

21 124. Proposed Intervenors lack sufficient knowledge or information to form a
22 belief as to the truth or falsity of the allegations in Paragraph 124 and therefore deny them.

23 **Unlawful Curing Procedures**

24 125. Paragraph 125 states a legal conclusion to which no response is required. To
25 the extent a response is required, Proposed Intervenors admit that the cited statute contains
26 the quoted language.

27 126. Proposed Intervenors lack sufficient knowledge or information to form a
28 belief as to the truth or falsity of the allegations in Paragraph 126 and therefore deny them.

1 127. Proposed Intervenors lack sufficient knowledge or information to form a
2 belief as to the truth or falsity of the allegations in Paragraph 127 and therefore deny them.

3 128. Proposed Intervenors lack sufficient knowledge or information to form a
4 belief as to the truth or falsity of the allegations in Paragraph 128 and therefore deny them.

5 129. Proposed Intervenors lack sufficient knowledge or information to form a
6 belief as to the truth or falsity of the allegations in Paragraph 129 and therefore deny them.

7 130. Proposed Intervenors lack sufficient knowledge or information to form a
8 belief as to the truth or falsity of the allegations in Paragraph 130 and therefore deny them.

9 131. Proposed Intervenors lack sufficient knowledge or information to form a
10 belief as to the truth or falsity of the allegations in Paragraph 131 and therefore deny them.

11 132. Proposed Intervenors admit that the website cited in Paragraph 132 contains
12 the quoted language. Proposed Intervenors lack sufficient knowledge or information to form
13 a belief as to the truth or falsity of the remaining allegations in Paragraph 132 and therefore
14 deny them.

15 133. Proposed Intervenors lack sufficient knowledge or information to form a
16 belief as to the truth or falsity of the allegations in Paragraph 133 and therefore deny them.

17 **Unstaffed Drop Boxes**

18 134. Proposed Intervenors lack sufficient knowledge or information to form a
19 belief as to the truth or falsity of the allegations in Paragraph 134 and therefore deny them.

20 135. Proposed Intervenors lack sufficient knowledge or information to form a
21 belief as to the truth or falsity of the allegations in the second sentence of Paragraph 135
22 and therefore deny them. Paragraph 135 otherwise states a legal conclusion to which no
23 response is required. To the extent a response is required, Proposed Intervenors admit that
24 the cited statute contains the quoted language.

25 136. Paragraph 136 states a legal conclusion to which no response is required. To
26 the extent a response is required, Proposed Intervenors admit that the cited statute contains
27 the quoted language, but deny the allegations to the extent they mischaracterize the statute.

28 137. Proposed Intervenors lack sufficient knowledge or information to form a

1 belief as to the truth or falsity of the allegations in Paragraph 137 and therefore deny them.

2 138. Proposed Intervenors admit that the Oxford English Dictionary definition
3 cited in Paragraph 138 contains the quoted language. Paragraph 138 otherwise states a legal
4 conclusion to which no response is required. To the extent a response is required, Proposed
5 Intervenors admit that the cited statute does not define the term “staffed.”

6 139. Proposed Intervenors admit that the Oxford English Dictionary definition
7 cited in Paragraph 139 contains the quoted language. Paragraph 139 otherwise states a legal
8 conclusion to which no response is required. To the extent a response is required, Proposed
9 Intervenors deny the allegations.

10 140. Paragraph 140 states a legal conclusion to which no response is required. To
11 the extent a response is required, Proposed Intervenors deny the allegations.

12 141. Paragraph 141 states a legal conclusion to which no response is required. To
13 the extent a response is required, Proposed Intervenors deny the allegations.

14 142. Paragraph 142 states a legal conclusion to which no response is required. To
15 the extent a response is required, Proposed Intervenors deny the allegations.

16 143. Proposed Intervenors admit that the cited article contains the quoted language.
17 The remainder of Paragraph 143 states a legal conclusion to which no response is required.
18 To the extent a response is required, Proposed Intervenors deny the allegations.

19 144. Proposed Intervenors lack sufficient knowledge or information to form a
20 belief as to the truth or falsity of the remaining allegations in Paragraph 144 and therefore
21 deny them.

22 145. Paragraph 145 states a legal conclusion to which no response is required. To
23 the extent a response is required, Proposed Intervenors deny the allegations.

24 **COUNT I**

25 146. Proposed Intervenors incorporate by reference each of their preceding
26 admissions, denials, and statements as if fully set forth herein.

27 147. Paragraph 147 states a legal conclusion to which no response is required. To
28 the extent a response is required, Proposed Intervenors admit that the cited statute contains

1 the quoted language.

2 148. Paragraph 148 states a legal conclusion to which no response is required. To
3 the extent a response is required, Proposed Intervenors admit that the EPM, at different
4 sections, contains provisions relating to counting ballots and specific forms, but deny the
5 allegations to the extent they mischaracterize the EPM.

6 149. Proposed Intervenors lack sufficient knowledge or information to form a belief
7 as to the truth or falsity of the allegations in Paragraph 149 and therefore deny them.

8 150. Proposed Intervenors lack sufficient knowledge or information to form a belief
9 as to the truth or falsity of the allegations in Paragraph 150 and therefore deny them.

10 151. Paragraph 151 states a legal conclusion to which no response is required. To
11 the extent a response is required, Proposed Intervenors deny the allegations.

12 152. Paragraph 152 states a legal conclusion to which no response is required. To
13 the extent a response is required, Proposed Intervenors deny the allegations.

14 153. Paragraph 153 states a legal conclusion to which no response is required. To
15 the extent a response is required, Proposed Intervenors deny the allegations.

16 154. Paragraph 154 states a legal conclusion to which no response is required. To
17 the extent a response is required, Proposed Intervenors deny the allegations.

18 155. Paragraph 155 states a legal conclusion to which no response is required. To
19 the extent a response is required, Proposed Intervenors deny the allegations.

20 156. Paragraph 156 states a legal conclusion to which no response is required. To
21 the extent a response is required, Proposed Intervenors deny the allegations.

22 **COUNT II**

23 157. Proposed Intervenors incorporate by reference each of their preceding
24 admissions, denials, and statements as if fully set forth herein.

25 158. Paragraph 158 states a legal conclusion to which no response is required. To
26 the extent a response is required, Proposed Intervenors admit the allegations.

27 159. Paragraph 159 states a legal conclusion to which no response is required. To
28 the extent a response is required, Proposed Intervenors deny the allegations.

1 172. Paragraph 172 states a legal conclusion to which no response is required. To
2 the extent a response is required, Proposed Intervenor's admit that the cited constitutional
3 provision contains the quoted language.

4 173. Paragraph 173 states a legal conclusion to which no response is required. To
5 the extent a response is required, Proposed Intervenor's deny the allegations.

6 174. Paragraph 174 states a legal conclusion to which no response is required. To
7 the extent a response is required, Proposed Intervenor's deny the allegations.

8 175. Paragraph 175 states a legal conclusion to which no response is required. To
9 the extent a response is required, Proposed Intervenor's deny the allegations.

10 176. Paragraph 176 states a legal conclusion to which no response is required. To
11 the extent a response is required, Proposed Intervenor's deny the allegations.

12 **COUNT VI**

13 177. Proposed Intervenor's incorporate by reference each of their preceding
14 admissions, denials, and statements as if fully set forth herein.

15 178. Paragraph 178 states a legal conclusion to which no response is required. To
16 the extent a response is required, Proposed Intervenor's admit that the cited constitutional
17 provision contains the quoted language.

18 179. Paragraph 179 states a legal conclusion to which no response is required. To
19 the extent a response is required, Proposed Intervenor's deny the allegations.

20 180. Paragraph 180 states a legal conclusion to which no response is required. To
21 the extent a response is required, Proposed Intervenor's deny the allegations.

22 181. Paragraph 181 states a legal conclusion to which no response is required. To
23 the extent a response is required, Proposed Intervenor's deny the allegations.

24 **COUNT VII**

25 182. Proposed Intervenor's incorporate by reference each of their preceding
26 admissions, denials, and statements as if fully set forth herein.

27 183. Paragraph 183 states a legal conclusion to which no response is required. To
28 the extent a response is required, Proposed Intervenor's admit that the cited statute contains

1 the quoted language.

2 184. Paragraph 184 states a legal conclusion to which no response is required. To
3 the extent a response is required, Proposed Intervenor deny the allegations.

4 185. Proposed Intervenor lack sufficient knowledge or information to form a
5 belief as to the truth or falsity of the allegations in Paragraph 185 and therefore deny them.

6 186. Proposed Intervenor lack sufficient knowledge or information to form a
7 belief as to the truth or falsity of the allegations in Paragraph 186 and therefore deny them.

8 187. Paragraph 187 states a legal conclusion to which no response is required. To
9 the extent a response is required, Proposed Intervenor deny the allegations.

10 188. Paragraph 188 states a legal conclusion to which no response is required. To
11 the extent a response is required, Proposed Intervenor deny the allegations.

12 189. Proposed Intervenor lack sufficient knowledge or information to form a
13 belief as to the truth or falsity of the allegations in Paragraph 189 and therefore deny them.

14 190. Paragraph 190 states a legal conclusion to which no response is required. To
15 the extent a response is required, Proposed Intervenor deny the allegations.

16 **COUNT VIII**

17 191. Proposed Intervenor incorporate by reference each of their preceding
18 admissions, denials, and statements as if fully set forth herein.

19 192. Paragraph 192 states a legal conclusion to which no response is required. To
20 the extent a response is required, Proposed Intervenor admit that the cited statute contains
21 the quoted language.

22 193. Paragraph 193 states a legal conclusion to which no response is required. To
23 the extent a response is required, Proposed Intervenor admit that the cited statute contains
24 the quoted language.

25 194. Paragraph 194 states a legal conclusion to which no response is required. To
26 the extent a response is required, Proposed Intervenor deny the allegations.

27 195. Proposed Intervenor lack sufficient knowledge or information to form a
28 belief as to the truth or falsity of the allegations in Paragraph 195 and therefore deny them.

1 196. Paragraph 196 states a legal conclusion to which no response is required. To
2 the extent a response is required, Proposed Intervenor deny the allegations.

3 197. Proposed Intervenor lack sufficient knowledge or information to form a
4 belief as to the truth or falsity of the allegations in Paragraph 197 and therefore deny them.

5 198. Paragraph 198 states a legal conclusion to which no response is required. To
6 the extent a response is required, Proposed Intervenor deny the allegations.

7 **COUNT IX**

8 199. Proposed Intervenor incorporate by reference each of their preceding
9 admissions, denials, and statements as if fully set forth herein.

10 200. Paragraph 200 states a legal conclusion to which no response is required. To
11 the extent a response is required, Proposed Intervenor admit that the cited statute contains
12 the quoted language, but deny the allegations to the extent they mischaracterize the statute.

13 201. Paragraph 201 states a legal conclusion to which no response is required. To
14 the extent a response is required, Proposed Intervenor admit that the cited statute contains
15 the quoted language, but deny the allegations to the extent they mischaracterize the statute.

16 202. Paragraph 202 states a legal conclusion to which no response is required. To
17 the extent a response is required, Proposed Intervenor deny the allegations.

18 203. Paragraph 203 states a legal conclusion to which no response is required. To
19 the extent a response is required, Proposed Intervenor deny the allegations.

20 204. Paragraph 204 states a legal conclusion to which no response is required. To
21 the extent a response is required, Proposed Intervenor deny the allegations.

22 205. Paragraph 205 states a legal conclusion to which no response is required. To
23 the extent a response is required, Proposed Intervenor deny the allegations.

24 206. Paragraph 206 states a legal conclusion to which no response is required. To
25 the extent a response is required, Proposed Intervenor deny the allegations.

26 207. Paragraph 207 states a legal conclusion to which no response is required. To
27 the extent a response is required, Proposed Intervenor deny the allegations.

28

COUNT X

1
2 208. Proposed Intervenors incorporate by reference each of their preceding
3 admissions, denials, and statements as if fully set forth herein.

4 209. Proposed Intervenors lack sufficient knowledge or information to form a
5 belief as to the truth or falsity of the allegations in Paragraph 209 and therefore deny them.

6 210. Paragraph 210 states a legal conclusion to which no response is required. To
7 the extent a response is required, Proposed Intervenors admit that the cited statute contains
8 the quoted language, but deny the allegations to the extent they mischaracterize the statute.

9 211. Paragraph 211 states a legal conclusion to which no response is required. To
10 the extent a response is required, Proposed Intervenors deny the allegations.

11 212. Paragraph 212 states a legal conclusion to which no response is required. To
12 the extent a response is required, Proposed Intervenors admit that the cited statute contains
13 the quoted language, but deny the allegations to the extent they mischaracterize the statute.

14 213. Paragraph 213 states a legal conclusion to which no response is required. To
15 the extent a response is required, Proposed Intervenors deny the allegations.

16 214. Paragraph 214 states a legal conclusion to which no response is required. To
17 the extent a response is required, Proposed Intervenors deny the allegations.

18 215. Paragraph 215 states a legal conclusion to which no response is required. To
19 the extent a response is required, Proposed Intervenors admits the cited statute contains the
20 quoted language.

21 216. Paragraph 216 states a legal conclusion to which no response is required. To
22 the extent a response is required, Proposed Intervenors deny the allegations.

23 217. Proposed Intervenors lack sufficient knowledge or information to form a
24 belief as to the truth or falsity of the allegations in Paragraph 217 and therefore deny them.

25 218. Paragraph 218 states a legal conclusion to which no response is required. To
26 the extent a response is required, Proposed Intervenors deny the allegations.

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COUNT XI

219. Proposed Intervenors incorporate by reference each of their preceding admissions, denials, and statements as if fully set forth herein.

220. Paragraph 220 states a legal conclusion to which no response is required. To the extent a response is required, Proposed Intervenors admit that the cited statute contains the quoted language, but deny the allegations to the extent they mischaracterize the statute.

221. Paragraph 221 states a legal conclusion to which no response is required. To the extent a response is required, Proposed Intervenors deny the allegations.

222. Paragraph 222 states a legal conclusion to which no response is required. To the extent a response is required, Proposed Intervenors deny the allegations.

223. Paragraph 223 states a legal conclusion to which no response is required. To the extent a response is required, Proposed Intervenors deny the allegations.

224. Paragraph 224 states a legal conclusion to which no response is required. To the extent a response is required, Proposed Intervenors deny the allegations.

225. Paragraph 225 states a legal conclusion to which no response is required. To the extent a response is required, Proposed Intervenors deny the allegations.

226. Paragraph 226 states a legal conclusion to which no response is required. To the extent a response is required, Proposed Intervenors deny the allegations.

227. Paragraph 227 states a legal conclusion to which no response is required. To the extent a response is required, Proposed Intervenors deny the allegations.

COUNT XII

228. Proposed Intervenors incorporate by reference each of their preceding admissions, denials, and statements as if fully set forth herein.

229. Paragraph 229 states a legal conclusion to which no response is required. To the extent a response is required, Proposed Intervenors deny the allegations.

230. Paragraph 230 states a legal conclusion to which no response is required. To the extent a response is required, Proposed Intervenors deny the allegations.

231. Paragraph 231 states a legal conclusion to which no response is required. To

1 the extent a response is required, Proposed Intervenor deny the allegations.

2 232. Paragraph 232 states a legal conclusion to which no response is required. To
3 the extent a response is required, Proposed Intervenor deny the allegations.

4 233. Paragraph 233 states a legal conclusion to which no response is required. To
5 the extent a response is required, Proposed Intervenor deny the allegations.

6 234. Paragraph 234 states a legal conclusion to which no response is required. To
7 the extent a response is required, Proposed Intervenor deny the allegations.

8 **PRAYER FOR RELIEF**

9 Proposed Intervenor deny that Plaintiffs are entitled to any relief.

10 **GENERAL DENIAL**

11 Proposed Intervenor deny every allegation in Plaintiffs' Complaint that is not
12 expressly admitted herein.

13 **AFFIRMATIVE DEFENSES**

14 1. Plaintiffs' claims are barred in whole or in part for failure to state a claim
15 upon which relief can be granted.

16 2. Plaintiffs' claims are barred because Plaintiffs lack standing.

17 3. Plaintiffs' claims are barred in whole or in part for ripeness.

18 4. Plaintiffs' claims are barred because they seek relief inconsistent with the
19 Arizona and U.S. Constitutions.

20 5. Proposed Intervenor reserve the right to assert additional affirmative
21 defenses—including, but not limited to, those set forth in Arizona Rule of Civil Procedure
22 8(d)—as additional facts are discovered.

23 WHEREFORE, having fully answered Plaintiffs' Complaint, Proposed Intervenor
24 pray for judgment as follows:

25 A. That the Court dismiss Plaintiffs' Complaint;

26 B. That judgment be entered in favor of Proposed Intervenor and against
27 Plaintiffs on Plaintiffs' Complaint and that Plaintiffs take nothing thereby;

28 C. That Proposed Intervenor be awarded reasonable attorneys' fees and costs

1 under any applicable statute or equitable doctrine; and

2 D. For such other and further relief as the Court, deems appropriate.

3 RESPECTFULLY SUBMITTED this 29th day of February, 2024.

4 **COPPERSMITH BROCKELMAN PLC**

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24 *Arizona Alliance for Retired Americans and*
25 *Voto Latino*

26 **Pro Hac Vice Application Forthcoming*

27 ORIGINAL e-filed and served via electronic
28 means this 29th day of February, 2024, upon:

29 Honorable John D. Napper
30 Yavapai County Superior Court
31 c/o Felicia L. Slaton
32 Div2@courts.az.gov

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/s/ Diana Hanson

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