

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

KELVIN JONES,

Plaintiffs,

v.

RON DESANTIS, in his official capacity as  
Governor of the State of Florida, et al.,

Defendants.

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CONSOLIDATED

Case No.: 4:19-cv-00300-RH/MJF  
(Lead Case)

BONNIE RAYSOR, et al.,

Plaintiffs,

v.

LAUREL M. LEE, in her official capacity as  
Secretary of State of Florida,

Defendant.

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JEFF GRUVER, et al.,

Plaintiffs,

v.

KIM BARTON, et al.,

Defendants.

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Case No.: 4:19-cv-00301-RH/MJF

Case No.: 4:19-cv-00302-RH/MJF

LUIS MENDEZ,

Plaintiff,

v.

RON DESANTIS, in his official capacity as  
Governor of the State of Florida, et al.,

Defendants.

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Case No: 4:19-cv-00272-RH/MJF

**BILL COWLES, SUPERVISOR OF ELECTIONS OF ORANGE COUNTY'S  
ANSWER TO COMPLAINT FOR INJUNCTIVE AND DECLARATORY RELIEF**

Defendant, Bill Cowles, Supervisor of Elections of Orange County (“Defendant” or “Supervisor Cowles”), through undersigned counsel answers Plaintiffs’ Complaint as follows:

1. Defendant admits the material allegations within Paragraph 1 regarding passage or effect of Amendment 4.

2 The descriptions contained within Paragraph 2 are political in nature and not subject to either admission or denial. To the extent a response is required, Defendant is without knowledge.

3. The descriptions contained within Paragraph 3 are political in nature and not subject to either admission or denial. To the extent a response is required, Defendant is without knowledge.

4. The descriptions contained within Paragraph 4 are political in nature and not subject to either admission or denial. To the extent a response is required, Defendant is without knowledge.

5. The descriptions contained within Paragraph 5 are political in nature and not subject to either admission or denial. To the extent a response is required, Defendant is without knowledge.

6. The descriptions contained within Paragraph 6 are political in nature and not subject to either admission or denial. To the extent a response is required, Defendant is without knowledge.

7. The descriptions contained within Paragraph 7 are political in nature and not subject to either admission or denial. To the extent a response is required, Defendant is without knowledge.

8. The descriptions contained within Paragraph 8 are political in nature and not subject to either admission or denial. To the extent a response is required, Defendant is without knowledge.

9. The descriptions contained within Paragraph 9 are political in nature and not subject to either admission or denial. To the extent a response is required, Defendant is without knowledge.

10. Defendant is without knowledge as to the material allegations of Paragraph 10.

11. Defendant is without knowledge as to the material allegations of Paragraph 11.

12. Defendant is without knowledge as to the material allegations of Paragraph 12..

13. Defendant is without knowledge as to the material allegations of Paragraph 13.

14. Defendant is without knowledge as to the material allegations of Paragraph 14.

15. Defendant is without knowledge as to the material allegations of Paragraph 15.

16. Defendant is without knowledge as to the material allegations of Paragraph 16.

17. Defendant is without knowledge as to the material allegations of Paragraph 17.

18. Defendant is without knowledge as to the material allegations of Paragraph 18.

19. Defendant is without knowledge as to the material allegations of Paragraph 19.

20. Defendant admits that a local branch of the Florida NAACP is located in Orange County, and does not dispute the material allegations of Paragraph 20.

21. The descriptions contained within Paragraph 21 are political in nature and not subject to either admission or denial. To the extent a response is required, Defendant is without knowledge.

22. Defendant is without knowledge as to the material allegations of Paragraph 22.

23. Defendant is without knowledge as to the material allegations of Paragraph 23.

24. While Defendant is without knowledge regarding organizational allegations, Defendant does not dispute the material allegations of Paragraph 24.

25. While Defendant is without knowledge regarding organizational allegations, Defendant does not dispute the material allegations of Paragraph 25.

26. Defendant is without knowledge as to the material allegations of Paragraph 26.

27. While Defendant is without knowledge regarding organizational allegations, Defendant does not dispute the material allegations of Paragraph 27.

28. Defendant is without knowledge as to the material allegations of Paragraph 28.

29. Defendant is without knowledge as to the material allegations of Paragraph 29.

30. Defendant admits the material allegations within Paragraph 30.

31. Defendant admits the material allegations within Paragraph 31.

32. Defendant is without knowledge as to the material allegations of Paragraph 32.

33. Defendant admits the material allegations within Paragraph 33 for purposes of jurisdiction or venue.

34. Defendant admits the material allegations within Paragraph 34 for purposes of jurisdiction or venue.

35. Defendant admits the material allegations within Paragraph 35 for purposes of jurisdiction or venue.

36. Defendant admits the material allegations within Paragraph 36 for purposes of jurisdiction or venue.

37. Defendant admits the material allegations within Paragraph 37.

38. Defendant admits the material allegations within Paragraph 38.

39. Defendant admits the material allegations within Paragraph 39.

40. Defendant admits the material allegations within Paragraph 40.

41. Defendant admits the material allegations within Paragraph 41.

42. Defendant admits the material allegations within Paragraph 42.

43. Defendant is without knowledge as to the material allegations of Paragraph 43.

44. Defendant is without knowledge as to the material allegations of Paragraph 44.

45. Defendant is without knowledge as to the material allegations of Paragraph 45.

46. Defendant is without knowledge as to the material allegations of Paragraph 46.

47. Defendant is without knowledge as to the material allegations of Paragraph 47.

48. Defendant is without knowledge as to the material allegations of Paragraph 48.

49. Defendant admits the material allegations within Paragraph 49.

50. Defendant admits the material allegations within Paragraph 50.

51. Defendant admits the material allegations within Paragraph 51.

52. Defendant admits the material allegations within Paragraph 52.

53. Defendant admits the material allegations within Paragraph 53.

54. Defendant admits the material allegations within Paragraph 54.

55. Defendant admits the material allegations within Paragraph 55.

56. Defendant admits the material allegations within Paragraph 56.

57. Defendant admits the material allegations within Paragraph 57.

58. Defendant is without knowledge as to the material allegations of Paragraph 58.

59. The descriptions contained within Paragraph 59 are political in nature and not subject to either admission or denial. To the extent a response is required, Defendant is without knowledge.

60. The descriptions contained within Paragraph 60 are political in nature and not subject to either admission or denial. To the extent a response is required, Defendant is without knowledge.

61. Defendant is without knowledge as to the material allegations of Paragraph 61.

62. Defendant is without knowledge as to the material allegations of Paragraph 62.

63. Defendant is without knowledge as to the material allegations of Paragraph 63.

64. Paragraph 64 appears to be a legal statement for which no response is required. To the extent the paragraph requests a legal determination, Defendant is without knowledge.

65. Paragraph 65 appears to be a legal statement for which no response is required. To the extent the paragraph requests a legal determination, Defendant is without knowledge.

66. Defendant admits the material allegations within Paragraph 66.

67. Paragraph 67 appears to be a legal statement for which no response is required. To the extent the paragraph requests a legal determination, Defendant is without knowledge.

68. Defendant is without knowledge as to the material allegations of Paragraph 68.

69. Defendant is without knowledge as to the material allegations of Paragraph 69.

70. Defendant is without knowledge as to the material allegations of Paragraph 70.

71. Defendant is without knowledge as to the material allegations of Paragraph 71.

72. Defendant is without knowledge as to the material allegations of Paragraph 72.

73. Defendant is without knowledge as to the material allegations of Paragraph 73.

74. Defendant is without knowledge as to the material allegations of Paragraph 74.

75. Defendant is without knowledge as to the material allegations of Paragraph 75.

76. The descriptions contained within Paragraph 76 are political in nature and not subject to either admission or denial. To the extent a response is required, Defendant is without knowledge.

77. Defendant is without knowledge as to the material allegations of Paragraph 77.

78. Defendant is without knowledge as to the material allegations of Paragraph 78.



79. Defendant is without knowledge as to the material allegations of Paragraph 79.

80. Defendant is without knowledge as to the material allegations of Paragraph 80.

81. Defendant is without knowledge as to the material allegations of Paragraph 81.

82. Defendant is without knowledge as to the material allegations of Paragraph 82.

83. Defendant is without knowledge as to the material allegations of Paragraph 83.

84. Defendant is without knowledge as to the material allegations of Paragraph 84.

85. Defendant is without knowledge as to the material allegations of Paragraph 85.

86. Defendant is without knowledge as to the material allegations of Paragraph 86.

87. Defendant is without knowledge as to the material allegations of Paragraph 87.

88. Defendant is without knowledge as to the material allegations of Paragraph 88.

89. Defendant is without knowledge as to the material allegations of Paragraph 89.

90. Defendant is without knowledge as to the material allegations of Paragraph 90.

91. Defendant re-alleges all responses to preceding paragraphs as though restated here.

92. Defendant admits the material allegations within Paragraph 92.

93. Paragraph 93 appears to be a legal statement for which no response is required. To the extent the paragraph requests a legal determination, Defendant is without knowledge.

94. Defendant is without knowledge as to the material allegations of Paragraph 94.

95. Defendant is without knowledge as to the material allegations of Paragraph 95.

96. Defendant is without knowledge as to the material allegations of Paragraph 96.

97. Defendant is without knowledge as to the material allegations of Paragraph 97.

98. Paragraph 98 appears to be a legal statement for which no response is required. To the extent the paragraph requests a legal determination, Defendant is without knowledge.

99. Defendant re-alleges all responses to preceding paragraphs as though restated here.

100. Defendant is without knowledge as to the material allegations of Paragraph 100.

101. Defendant admits the material allegations within Paragraph 101.

102. Paragraph 102 appears to be a legal statement for which no response is required. To the extent the paragraph requests a legal determination, Defendant is without knowledge.

103. Paragraph 103 appears to be a legal statement for which no response is required. To the extent the paragraph requests a legal determination, Defendant is without knowledge.

104. Paragraph 104 appears to be a legal statement for which no response is required. To the extent the paragraph requests a legal determination, Defendant is without knowledge.

105. Defendant is without knowledge as to the material allegations of Paragraph 105.

106. Paragraph 106 appears to be a legal statement for which no response is required. To the extent the paragraph requests a legal determination, Defendant is without knowledge.

107. Paragraph 107 appears to be a legal statement for which no response is required. To the extent the paragraph requests a legal determination, Defendant is without knowledge.

108. Defendant is without knowledge as to the material allegations of Paragraph 108.

109. Paragraph 109 appears to be a legal statement for which no response is required. To the extent the paragraph requests a legal determination, Defendant is without knowledge.

110. Defendant is without knowledge as to the material allegations of Paragraph 110.

111. Defendant is without knowledge as to the material allegations of Paragraph 111.

112. Defendant re-alleges all responses to preceding paragraphs as though restated here.

113. Defendant admits the material allegations within Paragraph 113.

114. Defendant admits the material allegations within Paragraph 114.

115. Defendant is without knowledge as to the material allegations of Paragraph 115.

116. Defendant denies the material allegations of Paragraph 116.

117. Defendant is without knowledge as to the material allegations of Paragraph 117.

118. Defendant is without knowledge as to the material allegations of Paragraph 118.

119. Defendant is without knowledge as to the material allegations of Paragraph 119.

120. Defendant is without knowledge as to the material allegations of Paragraph 120.

121. Defendant is without knowledge as to the material allegations of Paragraph 121.

122. Defendant is without knowledge as to the material allegations of Paragraph 122.

123. Defendant is without knowledge as to the material allegations of Paragraph 123.

124. Defendant is without knowledge as to the material allegations of Paragraph 124.

125. Defendant is without knowledge as to the material allegations of Paragraph 125.

126. Defendant is without knowledge as to the material allegations of Paragraph 126.

127. Paragraph 127 appears to be a legal statement for which no response is required. To the extent the paragraph requests a legal determination, Defendant is without knowledge.

128. Defendant re-alleges all responses to preceding paragraphs as though restated here.

129. Paragraph 129 appears to be a legal statement for which no response is required. To the extent the paragraph requests a legal determination, Defendant is without knowledge.

130. Defendant admits the material allegation within Paragraph 130.

131. Defendant admits the material allegations within Paragraph 131.

132. Paragraph 132 appears to be a legal statement for which no response is required. To the extent the paragraph requests a legal determination, Defendant is without knowledge.

133. Paragraph 133 appears to be a legal statement for which no response is required. To the extent the paragraph requests a legal determination, Defendant is without knowledge..

134. Defendant re-alleges all responses to preceding paragraphs as though restated here.

135. Defendant admits the material allegations within Paragraph 135.

136. Defendant is without knowledge as to the material allegations of Paragraph 136.

137. Defendant is without knowledge as to the material allegations of Paragraph 137.

138. Defendant is without knowledge as to the material allegations of Paragraph 138.

139. Defendant is without knowledge as to the material allegations of Paragraph 139.

140. Defendant is without knowledge as to the material allegations of Paragraph 140.

141. Defendant is without knowledge as to the material allegations of Paragraph 141.

142. Defendant is without knowledge as to the material allegations of Paragraph 142.

143. Defendant is without knowledge as to the allegations contained in Paragraph 143 of the Complaint.

144. Paragraph 144 appears to be a legal statement for which no response is required. To the extent the paragraph requests a legal determination, Defendant is without knowledge

145. Paragraph 145 appears to be a legal statement for which no response is required. To the extent the paragraph requests a legal determination, Defendant is without knowledge.

146. Paragraph 146 appears to be a legal statement for which no response is required. To the extent the paragraph requests a legal determination, Defendant is without knowledge.

147. Paragraph 147 appears to be a legal statement for which no response is required. To the extent the paragraph requests a legal determination, Defendant is without knowledge.

148. Paragraph 148 appears to be a legal statement for which no response is required. To the extent the paragraph requests a legal determination, Defendant is without knowledge.

149. Defendant re-alleges all responses to preceding paragraphs as though restated here.

150. Paragraph 150 appears to be a legal statement for which no response is required. To the extent the paragraph requests a legal determination, Defendant is without knowledge.

151. Defendant is without knowledge as to the material allegations of Paragraph 151.

152. Defendant is without knowledge as to the material allegations of Paragraph 152.

153. Defendant is without knowledge as to the material allegations of Paragraph 153.

154. Defendant is without knowledge as to the material allegations of Paragraph 154.

155. Paragraph 155 appears to be a legal statement for which no response is required. To the extent the paragraph requests a legal determination, Defendant is without knowledge.

156. Defendant re-alleges all responses to preceding paragraphs as though restated here.

157. Defendant admits the material allegations within Paragraph 157.

158. Defendant is without knowledge as to the material allegations of Paragraph 158.

159. Paragraph 159 appears to be a legal statement for which no response is required. To the extent the paragraph requests a legal determination, Defendant is without knowledge.

160. Defendant is without knowledge as to the material allegations of Paragraph 160.

161. Defendant is without knowledge as to the material allegations of Paragraph 161.

162. Defendant is without knowledge as to the material allegations of Paragraph 162.



163. Defendant is without knowledge as to the material allegations of Paragraph 163.

164. Defendant is without knowledge as to the material allegations of Paragraph 164.

165. Paragraph 165 appears to be a legal statement for which no response is required. To the extent the paragraph requests a legal determination, Defendant is without knowledge.

166. Defendant re-alleges all responses to preceding paragraphs as though restated here.

167. Defendant admits the material allegations within Paragraph 167.

168. Paragraph 168 appears to be a legal statement for which no response is required. To the extent the paragraph requests a legal determination, Defendant is without knowledge.

169. Paragraph 169 appears to be a legal statement for which no response is required. To the extent the paragraph requests a legal determination, Defendant is without knowledge.

170. Paragraph 170 appears to be a legal statement for which no response is required. To the extent the paragraph requests a legal determination, Defendant is without knowledge.

171. Paragraph 171 appears to be a legal statement for which no response is required. To the extent the paragraph requests a legal determination, Defendant is without knowledge.

172. Defendant is without knowledge as to the material allegations of Paragraph 172.

**AFFIRMATIVE DEFENSES OF DEFENDANT SUPERVISOR OF ELECTIONS  
OF ORANGE COUNTY, BILL COWLES**

1. Supervisor Cowles adopts all affirmative defenses asserted by the other Defendants and incorporates them by reference as if fully set forth herein.

2. Supervisor Cowles reserves the right to assert additional defenses as appropriate.

Respectfully submitted,

/s/ Nicholas A. Shannin

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Cowles, Supervisor of Elections for Orange  
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**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing using the Case Management/Electronic Case Filing (“CM/ECF”) system on August 29, 2019, which will send a Notice of Electronic Filing to all counsel of record for the parties who have appeared.

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