

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

DONALD J. TRUMP FOR PRESIDENT, INC.; <i>et al.</i> ,	)	Civil Action
	)	
Plaintiffs,	)	
	)	No.: 2-20-CV-966
v.	)	
	)	
KATHY BOOCKVAR; <i>et al.</i> ,	)	
	)	
Defendants.	)	Judge J. Nicholas Ranjan

**ANSWER TO COMPLAINT FOR DECLARATORY JUDGMENT BY DEFENDANT,  
LANCASTER COUNTY BOARD OF ELECTIONS**

Defendant, the Lancaster County Board of Elections, by and through Counsel, hereby answers Plaintiff’s Complaint as follows, denying each and every averment except as expressly admitted below:

**I. INTRODUCTION**

1. Paragraph 1 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.
2. Denied. Several averments in Paragraph 2 are directed to a party other than Answering Defendant and, accordingly, no response is required. To the extent that a response is required, the remaining averments are denied.
3. Paragraph 3 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.
4. Paragraph 4 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.
5. Admitted in part, denied in part. It is admitted only that Plaintiffs have initiated

suit against the Defendants and seek certain relief. It is denied that Plaintiffs are entitled to the relief sought.

## **II. JURISDICTION AND VENUE**

6. Admitted that jurisdiction properly lies with this Court.

7. Admitted that venue is proper.

## **III. PARTIES**

8-17. Admitted, on information and belief.

## **IV. FACTUAL ALLEGATIONS**

18. Paragraph 18 states opinions and/or conclusions to which no reply is necessary.

To the extent a reply is deemed necessary, the same is denied.

19. Paragraph 19 states opinions and/or conclusions to which no reply is necessary.

To the extent a reply is deemed necessary, the same is denied.

20. Paragraph 20 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

21. Paragraph 21 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

22. Paragraph 22 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

23. Paragraph 23 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

24. Paragraph 24 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

25. Paragraph 25 states a conclusion of law to which no reply is necessary. To the

extent a reply is deemed necessary, the same is denied.

26. Paragraph 26 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

27. Paragraph 27 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

28. Paragraph 28 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

29. Paragraph 29 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

30. Paragraph 30 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

31. Paragraph 31 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

32. Paragraph 32 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

33. Paragraph 33 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

34. Paragraph 34 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

35. Paragraph 35 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

36. Paragraph 36 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

37. Paragraph 37 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

38. Paragraph 38 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

39. Paragraph 39 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

40. Paragraph 40 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

41. Paragraph 41 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

42. Paragraph 42 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

43. Paragraph 43 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

44. Paragraph 44 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

45. Paragraph 45 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

46. Paragraph 46 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

47. Paragraph 47 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

48. Paragraph 48 states a conclusion of law to which no reply is necessary. To the

extent a reply is deemed necessary, the same is denied.

49. Admitted.

50. Paragraph 50 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

51. Paragraph 51 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

52. Paragraph 52 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

53. Paragraph 53 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

54. Paragraph 54 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

55. Paragraph 55 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

56. Paragraph 56 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

57. Paragraph 57 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

58. Paragraph 58 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

59. Paragraph 59 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

60. Paragraph 60 states opinions and/or conclusions to which no reply is necessary.

To the extent a reply is deemed necessary, the same is denied.

61. Paragraph 61 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

62. Paragraph 62 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

63. Paragraph 63 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

64. Paragraph 64 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

65. Paragraph 65 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

66. Paragraph 66 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

67. Paragraph 67 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

68. Paragraph 68 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

69. Defendant is without sufficient information to respond. Accordingly, the same is denied.

70. Defendant is without sufficient information to respond. Accordingly, the same is denied.

71. Defendant is without sufficient information to respond. Accordingly, the same is denied.

72. Defendant is without sufficient information to respond. Accordingly, the same is denied.

73. Defendant is without sufficient information to respond. Accordingly, the same is denied.

74. Defendant is without sufficient information to respond. Accordingly, the same is denied.

75. Defendant is without sufficient information to respond. Accordingly, the same is denied.

76. Defendant is without sufficient information to respond. Accordingly, the same is denied.

77. Defendant is without sufficient information to respond. Accordingly, the same is denied.

78. Defendant is without sufficient information to respond. Accordingly, the same is denied.

79. Paragraph 79 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

80. Paragraph 80 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

81. Paragraph 81 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

82. Paragraph 82 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

83. Paragraph 83 states a conclusion of law to which no reply is necessary. To the

extent a reply is deemed necessary, the same is denied.

84. Paragraph 84 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

85. Paragraph 85 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

86. Paragraph 86 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

87. Paragraph 87 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

88. Paragraph 88 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

89. Paragraph 89 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

90. Paragraph 90 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

91. Admitted.

92. Paragraph 92 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

93. Paragraph 93 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

94. Paragraph 94 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

95. Paragraph 95 states a conclusion of law to which no reply is necessary. To the



extent a reply is deemed necessary, the same is denied.

96. Paragraph 96 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

97. Paragraph 97 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

98. Paragraph 98 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

99. Paragraph 99 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

100. Paragraph 100 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

101. Paragraph 101 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

102. Paragraph 102 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

103. Paragraph 103 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

104. Paragraph 104 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

105. Paragraph 105 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

106. Paragraph 106 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

107. Paragraph 107 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

108. Paragraph 108 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

109. Paragraph 109 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

110. Paragraph 110 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

111. Admitted.

112. Defendant is without sufficient information to respond. Accordingly, the same is denied.

113. Defendant is without sufficient information to respond. Accordingly, the same is denied.

114. Denied. To the extent that the averments in Paragraph 101 are directed to a party other than Answering Defendant, no response is required.

115. Defendant is without sufficient information to respond. Accordingly, the same is denied.

116. Admitted.

117. Admitted.

118. Paragraph 118 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

119. Paragraph 119 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

120. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 120 are directed to a party other than Answering Defendant, no response is required.

121. Admitted.

122. Admitted.

123. Paragraph 123 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

124. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 124 are directed to a party other than Answering Defendant, no response is required.

125. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 125 are directed to a party other than Answering Defendant, no response is required.

126. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 126 are directed to a party other than Answering Defendant, no response is required.

127. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 127 are directed to a party other than Answering Defendant, no response is required.

128. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 128 are directed to a party other than Answering Defendant, no response is required.

129. Paragraph 129 states opinions and/or conclusions to which no reply is necessary.

To the extent a reply is deemed necessary, the same is denied.

130. Paragraph 130 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

131. Paragraph 131 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

132. Paragraph 132 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

133. Paragraph 133 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

134. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 134 are directed to a party other than Answering Defendant, no response is required.

135. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 135 are directed to a party other than Answering Defendant, no response is required.

136. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 136 are directed to a party other than Answering Defendant, no response is required.

137. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 137 are directed to a party other than Answering Defendant, no response is required.

138. Defendant is without sufficient information to respond. Accordingly, the same is denied.

139. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 139 are directed to a party other than Answering Defendant, no response is required.

140. Admitted.

141. Admitted.

142. Admitted.

143. Paragraph 143 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

144. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 144 are directed to a party other than Answering Defendant, no response is required.

145. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 145 are directed to a party other than Answering Defendant, no response is required.

146. Paragraph 146 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

147. Paragraph 147 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

148. Paragraph 148 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

149. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 149 are directed to a party other than Answering Defendant, no response is required.

150. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 150 are directed to a party other than Answering Defendant, no response is required.

151. Paragraph 151 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

152. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 152 are directed to a party other than Answering Defendant, no response is required.

153. Admitted.

154. Admitted.

155. Admitted.

156. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 156 are directed to a party other than Answering Defendant, no response is required.

157. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 157 are directed to a party other than Answering Defendant, no response is required.

158. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 158 are directed to a party other than Answering Defendant, no response is required.

159. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 159 are directed to a party other than Answering Defendant, no response is required.

160. Paragraph 160 states opinions and/or conclusions to which no reply is necessary.

To the extent a reply is deemed necessary, the same is denied.

161. Paragraph 161 states opinions and/or conclusions to which no reply is necessary.

To the extent a reply is deemed necessary, the same is denied.

162. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 162 are directed to a party other than Answering Defendant, no response is required.

163. Admitted.

164. Paragraph 164 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

165. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 165 are directed to a party other than Answering Defendant, no response is required.

166. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 166 are directed to a party other than Answering Defendant, no response is required.

167. Admitted.

168. Admitted.

169. Paragraph 169 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

170. Paragraph 170 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

171. Paragraph 171 states opinions and/or conclusions to which no reply is necessary.

To the extent a reply is deemed necessary, the same is denied.

172. Paragraph 172 states opinions and/or conclusions to which no reply is necessary.

To the extent a reply is deemed necessary, the same is denied.

173. Admitted.

174. Admitted.

175. Paragraph 175 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

176. Paragraph 176 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

177. Paragraph 177 states opinions and/or conclusions to which no reply is necessary.

To the extent a reply is deemed necessary, the same is denied.

177. Defendant is without sufficient information to respond. Accordingly, the same is denied.

178. Admitted.

179. Paragraph 179 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

180. Paragraph 180 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

181. Paragraph 181 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

182. Paragraph 182 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

183. Paragraph 183 states opinions and/or conclusions to which no reply is necessary.



To the extent a reply is deemed necessary, the same is denied.

184. Paragraph 184 states opinions and/or conclusions to which no reply is necessary.

To the extent a reply is deemed necessary, the same is denied.

185. Paragraph 185 states opinions and/or conclusions to which no reply is necessary.

To the extent a reply is deemed necessary, the same is denied.

186. Paragraph 186 states opinions and/or conclusions to which no reply is necessary.

To the extent a reply is deemed necessary, the same is denied.

187. Paragraph 187 states opinions and/or conclusions to which no reply is necessary.

To the extent a reply is deemed necessary, the same is denied.

188. Paragraph 188 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

189. Paragraph 189 states opinions and/or conclusions to which no reply is necessary.

To the extent a reply is deemed necessary, the same is denied.

190. Paragraph 190 states opinions and/or conclusions to which no reply is necessary.

To the extent a reply is deemed necessary, the same is denied.

191. Paragraph 191 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

192. Admitted.

193. Paragraph 193 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

194. Paragraph 194 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

195. Defendant is without sufficient information to respond. Accordingly, the same is

denied.

196. Paragraph 196 states opinions and/or conclusions to which no reply is necessary.

To the extent a reply is deemed necessary, the same is denied.

197. Paragraph 197 states a conclusion of law to which no reply is necessary. To the

extent a reply is deemed necessary, the same is denied.

198. Paragraph 198 states opinions and/or conclusions to which no reply is necessary.

To the extent a reply is deemed necessary, the same is denied.

199. Paragraph 199 states opinions and/or conclusions to which no reply is necessary.

To the extent a reply is deemed necessary, the same is denied.

200. Paragraph 200 states opinions and/or conclusions to which no reply is necessary.

To the extent a reply is deemed necessary, the same is denied.

201. Paragraph 201 states opinions and/or conclusions to which no reply is necessary.

To the extent a reply is deemed necessary, the same is denied.

202. Paragraph 202 states opinions and/or conclusions to which no reply is necessary.

To the extent a reply is deemed necessary, the same is denied.

203. Paragraph 203 states opinions and/or conclusions to which no reply is necessary.

To the extent a reply is deemed necessary, the same is denied.

204. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 204 are directed to a party other than Answering Defendant, no response is required.

205. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 205 are directed to a party other than Answering Defendant, no response is required.

206. Paragraph 206 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

207. Paragraph 207 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

208. Paragraph 208 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

209. Paragraph 209 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

210. Defendant is without sufficient information to respond. Accordingly, the same is denied.

211. Defendant is without sufficient information to respond. Accordingly, the same is denied.

212. Defendant is without sufficient information to respond. Accordingly, the same is denied.

213. Paragraph 213 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

214. Paragraph 214 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

215. Paragraph 215 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

216. Paragraph 216 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

217. Paragraph 217 states opinions and/or conclusions to which no reply is necessary.

To the extent a reply is deemed necessary, the same is denied.

218. Paragraph 218 states opinions and/or conclusions to which no reply is necessary.

To the extent a reply is deemed necessary, the same is denied.

219. Paragraph 219 states opinions and/or conclusions to which no reply is necessary.

To the extent a reply is deemed necessary, the same is denied.

220. Admitted in part, denied in part. It is admitted only that Plaintiffs seek certain relief. It is denied that Plaintiffs are entitled to the relief sought.

### COUNT I

221. Answering Defendant hereby incorporates by reference its answers to Paragraphs 1-220, inclusive, to Plaintiff's Complaint, as if fully set forth at length.

222. Paragraph 222 states opinions and/or conclusions to which no reply is necessary.

To the extent a reply is deemed necessary, the same is denied.

223. Paragraph 223 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

224. Paragraph 224 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

225. Paragraph 225 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

226. Paragraph 226 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

227. Paragraph 227 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

228. Paragraph 228 states a conclusion of law to which no reply is necessary. To the

extent a reply is deemed necessary, the same is denied.

229. Denied. To the extent that the averments in Paragraph 229 are directed to a party other than Answering Defendant, no response is required.

230. Paragraph 230 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

231. Paragraph 231 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

232. Paragraph 232 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

233. Defendant is without sufficient information to respond. Accordingly, the same is denied.

## COUNT II

234. Answering Defendant hereby incorporates by reference its answers to Paragraphs 1-233, inclusive, to Plaintiff's Complaint, as if fully set forth at length.

235. Paragraph 235 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

236. Paragraph 236 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

237. Paragraph 237 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

238. Paragraph 238 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

239. Denied. To the extent that the averments in Paragraph 239 are directed to a party

other than Answering Defendant, no response is required.

240. Paragraph 240 states opinions and/or conclusions to which no reply is necessary.

To the extent a reply is deemed necessary, the same is denied.

241. Denied. To the extent that the averments in Paragraph 241 are directed to a party other than Answering Defendant, no response is required.

242. Denied. To the extent that the averments in Paragraph 242 are directed to a party other than Answering Defendant, no response is required.

243. Defendant is without sufficient information to respond. Accordingly, the same is denied.

### COUNT III

244. Answering Defendant hereby incorporates by reference its answers to Paragraphs 1-243, inclusive, to Plaintiff's Complaint, as if fully set forth at length.

245. Paragraph 245 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

246. Paragraph 246 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

247. Paragraph 247 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

248. Denied. To the extent that the averments in Paragraph 248 are directed to a party other than Answering Defendant, no response is required.

249. Denied. To the extent that the averments in Paragraph 249 are directed to a party other than Answering Defendant, no response is required.

250. Defendant is without sufficient information to respond. Accordingly, the same is

denied.

COUNT IV

251. Answering Defendant hereby incorporates by reference its answers to Paragraphs 1-250, inclusive, to Plaintiff's Complaint, as if fully set forth at length.

252. Paragraph 252 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

253. Paragraph 253 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

254. Paragraph 254 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

255. Defendant is without sufficient information to respond. Accordingly, the same is denied.

256. Defendant is without sufficient information to respond. Accordingly, the same is denied.

257. Denied. To the extent that the averments in Paragraph 257 are directed to a party other than Answering Defendant, no response is required.

258. Paragraph 258 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

259. Denied. To the extent that the averments in Paragraph 259 are directed to a party other than Answering Defendant, no response is required.

260. Defendant is without sufficient information to respond. Accordingly, the same is denied.

COUNT V

261. Answering Defendant hereby incorporates by reference their answers to Paragraphs 1-260, inclusive, to Plaintiff's Complaint, as if fully set forth at length.

262. Paragraph 262 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

263. Denied. To the extent that the averments in Paragraph 263 are directed to a party other than Answering Defendant, no response is required.

264. Defendant is without sufficient information to respond. Accordingly, the same is denied.

COUNT VI

265. Answering Defendant hereby incorporates by reference its answers to Paragraphs 1-264, inclusive, to Plaintiff's Complaint, as if fully set forth at length.

266. Defendant is without sufficient information to respond. Accordingly, the same is denied.

267. Denied. To the extent that the averments in Paragraph 267 are directed to a party other than Answering Defendant, no response is required.

268. Paragraph 268 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

269. Paragraph 269 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

270. Denied. To the extent that the averments in Paragraph 270 are directed to a party other than Answering Defendant, no response is required.

271. Denied. To the extent that the averments in Paragraph 271 are directed to a party



other than Answering Defendant, no response is required.

272. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 272 are directed to a party other than Answering Defendant, no response is required.

273. Paragraph 273 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

274. Denied. To the extent that the averments in Paragraph 274 are directed to a party other than Answering Defendant, no response is required.

275. Denied. To the extent that the averments in Paragraph 275 are directed to a party other than Answering Defendant, no response is required.

276. Defendant is without sufficient information to respond. Accordingly, the same is denied.

#### COUNT VII

277. Answering Defendant hereby incorporates by reference their answers to Paragraphs 1-276, inclusive, to Plaintiff's Complaint, as if fully set forth at length.

278. Denied. To the extent that the averments in Paragraph 278 are directed to a party other than Answering Defendant, no response is required.

279. Denied. To the extent that the averments in Paragraph 279 are directed to a party other than Answering Defendant, no response is required.

280. Defendant is without sufficient information to respond. Accordingly, the same is denied.

#### COUNT VIII

281. Answering Defendant hereby incorporates by reference their answers to

Paragraphs 1-280, inclusive, to Plaintiff's Complaint, as if fully set forth at length.

282. Paragraph 282 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

283. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 283 are directed to a party other than Answering Defendant, no response is required.

284. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 284 are directed to a party other than Answering Defendant, no response is required.

285. Defendant is without sufficient information to respond. Accordingly, the same is denied. To the extent that the averments in Paragraph 285 are directed to a party other than Answering Defendant, no response is required.

286. Paragraph 286 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

287. Paragraph 287 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

288. Denied. To the extent that the averments in Paragraph 288 are directed to a party other than Answering Defendant, no response is required.

289. Defendant is without sufficient information to respond. Accordingly, the same is denied.

#### COUNT IX

290. Answering Defendant hereby incorporates by reference their answers to Paragraphs 1-289, inclusive, to Plaintiff's Complaint, as if fully set forth at length.

291. Paragraph 291 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

292. Denied. To the extent that the averments in Paragraph 266 are directed to a party other than Answering Defendant, no response is required.

293. Defendant is without sufficient information to respond. Accordingly, the same is denied.

WHEREFORE, for all of the reasons set forth herein, the Defendant, Lancaster County Board of Elections, requests this Honorable Court to dismiss Plaintiff's Complaint.

Respectfully submitted,

By /Christina L. Hausner/

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*Attorney for Lancaster County Board of  
Elections*

**CERTIFICATE OF SERVICE**

I hereby certify that on this day, a true and correct copy of the foregoing document was filed electronically. Notice of this filing will be sent to all registered parties by operation of the Court's electronic filing system.

Respectfully submitted,

By/Christina L. Hausner/

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Date: September 25, 2020

*Attorney for Lancaster County Board of  
Elections*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

DONALD J. TRUMP FOR PRESIDENT, INC.; <i>et al.</i> ,	)	Civil Action
	)	
Plaintiffs,	)	
	)	
v.	)	No.: 2-20-CV-966
	)	
KATHY BOOCKVAR; <i>et al.</i> ,	)	
	)	
Defendants.	)	Judge J. Nicholas Ranjan

**DISCLOSURE STATEMENT**

Pursuant to LCvR 7.1 of the Western District of Pennsylvania and to enable Judges and Magistrate Judges to evaluate possible disqualification or recusal, the undersigned counsel of Defendant Lancaster County Board of Elections in the above-captioned action certifies that there are no parents, subsidiaries, and/or affiliates of said Defendant that have issued shares or debt securities to the public.

Respectfully submitted,

By/Christina L. Hausner/

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Date: September 25, 2020

*Attorney for Lancaster County Board of  
Elections*