

**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. Admitted.

49. Paragraph 49 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

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

58. Paragraph 58 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

59. Paragraph 59 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

60. Paragraph 60 states a conclusion of law to which no reply is necessary. To the

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

61. Paragraph 61 states opinions and/or conclusions to which no reply is necessary.

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

62. Paragraph 62 states a conclusion of law to which no reply is necessary. To the

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

63. Paragraph 63 states opinions and/or conclusions 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 a conclusion of law to which no reply is necessary. To the

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

66. Paragraph 66 states opinions and/or conclusions to which no reply is necessary.

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

67. Paragraph 67 states a conclusion of law to which no reply is necessary. To the

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

68. Defendant is without sufficient information to respond. Accordingly, 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. Paragraph 77 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

78. Paragraph 78 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, 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 a conclusion of law 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. Admitted.

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. Paragraph 91 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

92. Paragraph 92 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

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

94. Defendant is without sufficient information to respond. Accordingly, 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. Admitted.

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

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

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

102. Denied. To the extent that the averments in Paragraph 102 are directed to a party other than Answering Defendant, no response is required.

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

104. Denied. To the extent that the averments in Paragraph 104 are directed to a party other than Answering Defendant, no response is required.

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

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

110. Paragraph 110 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

111. Denied. To the extent that the averments in Paragraph 111 are directed to a party other than Answering Defendant, no response is required.

112. Denied. To the extent that the averments in Paragraph 112 are directed to a party other than Answering Defendant, no response is required.

113. Denied. To the extent that the averments in Paragraph 113 are directed to a party other than Answering Defendant, no response is required.

114. Paragraph 114 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

115. Paragraph 115 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

116. Paragraph 116 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

117. Paragraph 117 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

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

120. Paragraph 120 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

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

122. Paragraph 122 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

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. Paragraph 124 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

125. Paragraph 125 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

126. Paragraph 126 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

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

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

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

130. Denied. To the extent that the averments in Paragraph 130 are directed to a party

other than Answering Defendant, no response is required.

131. Denied. To the extent that the averments in Paragraph 131 are directed to a party other than Answering Defendant, no response is required.

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

133. Paragraph 133 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

134. Paragraph 134 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

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

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

137. Paragraph 137 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

138. Paragraph 138 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

139. Paragraph 139 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

140. Paragraph 140 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

141. Paragraph 141 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

142. Denied. To the extent that the averments in Paragraph 142 are directed to a party other than Answering Defendant, no response is required.

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. 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.

#### COUNT I

145. Answering Defendant hereby incorporates by reference its answers to Paragraphs 1-144, inclusive, to Plaintiff's Complaint, as if fully set forth at length.

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

149. Paragraph 149 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

150. Paragraph 150 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

151. Paragraph 151 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

152. Paragraph 152 states a conclusion of law to which no reply is necessary. To the

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

153. Denied. To the extent that the averments in Paragraph 153 are directed to a party other than Answering Defendant, no response is required.

154. Paragraph 154 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

155. Paragraph 155 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

156. Paragraph 156 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

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

## COUNT II

158. Answering Defendant hereby incorporates by reference its answers to Paragraphs 1-157, inclusive, to Plaintiff's Complaint, as if fully set forth at length.

159. Paragraph 159 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

160. Paragraph 160 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

161. Paragraph 161 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

162. Paragraph 162 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

163. Denied. To the extent that the averments in Paragraph 163 are directed to a party

other than Answering Defendant, no response is required.

164. Paragraph 164 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

165. Denied. To the extent that the averments in Paragraph 165 are directed to a party other than Answering Defendant, no response is required.

166. Denied. To the extent that the averments in Paragraph 166 are directed to a party other than Answering Defendant, no response is required.

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

### COUNT III

168. Answering Defendant hereby incorporates by reference its answers to Paragraphs 1-167, inclusive, to Plaintiff's Complaint, as if fully set forth at length.

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 a conclusion of law 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. Denied. To the extent that the averments in Paragraph 172 are directed to a party other than Answering Defendant, no response is required.

173. Denied. To the extent that the averments in Paragraph 173 are directed to a party other than Answering Defendant, no response is required.

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

denied.

COUNT IV

175. Answering Defendant hereby incorporates by reference its answers to Paragraphs 1-174, inclusive, to Plaintiff's Complaint, as if fully set forth at length.

176. Paragraph 176 states opinions and/or conclusions 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.

178. Paragraph 178 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

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

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

181. Denied. To the extent that the averments in Paragraph 181 are directed to a party other than Answering Defendant, no response is required.

182. Paragraph 182 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

183. Denied. To the extent that the averments in Paragraph 183 are directed to a party other than Answering Defendant, no response is required.

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



COUNT V

185. Answering Defendant hereby incorporates by reference their answers to Paragraphs 1-184, inclusive, to Plaintiff's Complaint, as if fully set forth at length.

186. Paragraph 186 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

187. Denied. To the extent that the averments in Paragraph 187 are directed to a party other than Answering Defendant, no response is required.

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

COUNT VI

189. Answering Defendant hereby incorporates by reference its answers to Paragraphs 1-188, inclusive, to Plaintiff's Complaint, as if fully set forth at length.

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

191. Denied. To the extent that the averments in Paragraph 191 are directed to a party other than Answering Defendant, no response is required.

192. Paragraph 192 states a conclusion of law to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

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. Denied. To the extent that the averments in Paragraph 194 are directed to a party other than Answering Defendant, no response is required.

195. Denied. To the extent that the averments in Paragraph 195 are directed to a party

other than Answering Defendant, no response is required.

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

197. Paragraph 197 states opinions and/or conclusions to which no reply is necessary. To the extent a reply is deemed necessary, the same is denied.

198. Denied. To the extent that the averments in Paragraph 198 are directed to a party other than Answering Defendant, no response is required.

199. Denied. To the extent that the averments in Paragraph 199 are directed to a party other than Answering Defendant, no response is required.

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

#### COUNT VII

201. Answering Defendant hereby incorporates by reference their answers to Paragraphs 1-200, inclusive, to Plaintiff's Complaint, as if fully set forth at length.

202. Denied. To the extent that the averments in Paragraph 202 are directed to a party other than Answering Defendant, no response is required.

203. Denied. To the extent that the averments in Paragraph 203 are directed to a party other than Answering Defendant, no response is required.

204. 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/

Christina L. Hausner, Bar ID No. 32373  
Lancaster County Solicitor  
150 North Queen Street, Suite #714  
Lancaster, PA 17603  
Tel: 717-735-1584  
CHausner@co.lancaster.pa.us

*Attorney for Lancaster County Board of  
Elections*