

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

DONALD J. TRUMP FOR PRESIDENT, INC.,	:	CIVIL ACTION
GLENN THOMPSON, MIKE KELLY, JOHN JOYCE,	:	
GUY RESCHENTHALER, REPUBLICAN NATIONAL	:	
COMMITTEE, MELANIE STRINGHILL PATTERSON	:	
And CLAYTON DAVID SHOW,	:	
Plaintiffs	:	
	:	NO. 2-20-CV-966
Vs.	:	
	:	
KATHY BOOCKVAR, in her capacity as Secretary	:	
of the Commonwealth of Pennsylvania, ADAMS	:	
COUNTY BOARD OF ELECTIONS, ALLEGHENY COUNTY	:	
BOARD OF ELECTIONS, ARMSTRONG COUNTY BOARD OF	:	
ELECTIONS, BEAVER COUNTY BOARD OF ELECTIONS,	:	
BEDFORD COUNTY BOARD OF ELECTIONS, BERKS COUNTY	:	
BOARD OF ELECTIONS, BLAIR COUNTY BOARD OF	:	
ELECTIONS, BRADFORD COUNTY BOARD OF ELECTIONS,	:	
BUCKS COUNTY BOARD OF ELECTIONS, BUTLER COUNTY	:	
BOARD OF ELECTIONS, CAMBRIA COUNTY BOARD OF	:	
ELECTIONS, CAMERON COUNTY BOARD OF ELECTIONS,	:	
CARBON COUNTY BOARD OF ELECTIONS, CENTRE COUNTY	:	
BOARD OF ELECTIONS, CHESTER COUNTY BOARD OF	:	
ELECTIONS, CLARION COUNTY BOARD OF ELECTIONS,	:	
CLEARFIELD COUNTY BOARD OF ELECTIONS, CLINTON	:	
COUNTY BOARD OF ELECTIONS, COLUMBIA COUNTY BOARD	:	
OF ELECTIONS, CRAWFORD COUNTY BOARD OF ELECTIONS,	:	
CUMBERLAND COUNTY BOARD OF ELECTIONS, DAUPHIN	:	
COUNTY BOARD OF ELECTIONS, DELAWARE COUNTY BOARD	:	
OF ELECTIONS, ELK COUNTY BOARD OF ELECTIONS,	:	
ERIE COUNTY BOARD OF ELECTIONS, FAYETTE COUNTY	:	
BOARD OF ELECTIONS, FOREST COUNTY BOARD OF	:	
ELECTIONS, FRANKLIN COUNTY BOARD OF ELECTIONS,	:	
FULTON COUNTY BOARD OF ELECTIONS, GREENE COUNTY	:	
BOARD OF ELECTIONS, HUNTINGDON COUNTY BOARD OF	:	
ELECTIONS, INDIANA COUNTY BOARD OF ELECTIONS,	:	
JEFFERSON COUNTY BOARD OF ELECTIONS, JUNIATA	:	
COUNTY BOARD OF ELECTIONS, LACKAWANNA COUNTY	:	
BOARD OF ELECTIONS, LANCASTER COUNTY BOARD OF	:	
ELECTIONS, LAWRENCE COUNTY BOARD OF ELECTIONS,	:	
LEBANON COUNTY BOARD OF ELECTIONS, LEHIGH COUNTY	:	
BOARD OF ELECTIONS, LUZERNE COUNTY BOARD OF	:	
ELECTIONS, LYCOMING COUNTY BOARD OF ELECTIONS,	:	

MCKEAN COUNTY BOARD OF ELECTIONS, MERCER COUNTY :  
BOARD OF ELECTIONS, MIFFLIN COUNTY BOARD OF :  
ELECTIONS, MONROE COUNTY BOARD OF ELECTIONS, :  
MONTGOMERY COUNTY BOARD OF ELECTIONS, MONTOUR :  
COUNTY BOARD OF ELECTIONS, NORTHAMPTON COUNTY :  
BOARD OF ELECTIONS, NORTHUMBERLAND COUNTY BOARD :  
OF ELECTIONS, PERRY COUNTY BOARD OF ELECTIONS, :  
PHILADELPHIA COUNTY BOARD OF ELECTIONS, PIKE :  
COUNTY BOARD OF ELECTIONS, POTTER COUNTY BOARD :  
OF ELECTIONS, SCHUYLKILL COUNTY BOARD OF :  
ELECTIONS, SNYDER COUNTY BOARD OF ELECTIONS, :  
SOMERSET COUNTY BOARD OF ELECTIONS, SULLIVAN :  
COUNTY BOARD OF ELECTIONS, SUSQUEHANNA COUNTY :  
BOARD OF ELECTIONS, TIOGA COUNTY BOARD OF :  
ELECTIONS, UNION COUNTY BOARD OF ELECTIONS, :  
VENANGO COUNTY BOARD OF ELECTIONS, WARREN COUNTY :  
BOARD OF ELECTIONS, WASHINGTON COUNTY BOARD OF :  
ELECTIONS, WAYNE COUNTY BOARD OF ELECTIONS, :  
WESTMORELAND COUNTY BOARD OF ELECTIONS, WYOMING :  
COUNTY BOARD OF ELECTIONS and YORK COUNTY BOARD :  
OF ELECTIONS, :  
Defendants :

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

The General Primary Contest in Huntingdon County for the Office of the President of the United States, along with other offices, was held on June 2, 2020. The total number of Democratic votes was 2682. The total number of Republican votes was 6882.

NOW comes the Respondent, the Huntingdon County Board of Elections, by and through Counsel, and files within Answer to the Complaint for Declaratory Judgment as follows:

1. Paragraph 1 contains introductory information to which no reply is necessary. Nevertheless, if a reply is deemed necessary, the

same is denied and strict proof thereof is demanded at the time of trial.

2. Denied as stated and strict proof thereof is demanded at the time of trial.

3. Denied as stated and strict proof thereof is demanded at the time of trial.

4. Admitted.

5. Paragraph 5 states a conclusion of law to which no reply is necessary. Nevertheless, if a reply is deemed necessary, the same is denied and strict proof thereof is demanded at the time of trial.

6. Admitted.

7. Admitted.

8. Respondent is without sufficient information to respond. Accordingly, the same is denied and strict proof thereof is demanded at the time of trial.

9. Respondent is without sufficient information to respond. Accordingly, the same is denied and strict proof thereof is demanded at the time of trial.

10. Respondent is without sufficient information to respond. Accordingly, the same is denied and strict proof thereof is demanded at the time of trial.

11. Respondent is without sufficient information to respond. Accordingly, the same is denied and strict proof thereof is demanded at the time of trial.

12. Respondent is without sufficient information to respond. Accordingly, the same is denied and strict proof thereof is demanded at the time of trial.

13. Respondent is without sufficient information to respond. Accordingly, the same is denied and strict proof thereof is demanded at the time of trial.

14. Respondent is without sufficient information to respond. Accordingly, the same is denied and strict proof thereof is demanded at the time of trial.

15. Respondent is without sufficient information to respond. Accordingly, the same is denied and strict proof thereof is demanded at the time of trial.

16. Respondent is without sufficient information to respond. Accordingly, the same is denied and strict proof thereof is demanded at the time of trial.

17. Admitted.

18. Admitted.

19. Admitted.

20. Admitted.

21. Admitted.

22. Admitted.

23. Admitted.

24. To the extent that this paragraph alleges fraud or misfeasance occurred in the Huntingdon County election process, the same is denied and strict proof thereof is demanded at the time of trial.

25. To the extent that this paragraph alleges fraud or misfeasance occurred in the Huntingdon County election process, the same is denied and strict proof thereof is demanded at the time of trial.

26. To the extent that this paragraph alleges fraud or misfeasance occurred in the Huntingdon County election process, the same is denied and strict proof thereof is demanded at the time of trial.

27. Admitted.

28. Admitted.

29. Admitted.

30. Admitted.

31. To the extent that this paragraph alleges fraud or misfeasance occurred in the Huntingdon County election process, the same is denied and strict proof thereof is demanded at the time of trial.

32. To the extent that this paragraph alleges fraud or misfeasance occurred in the Huntingdon County election process, the same is denied and strict proof thereof is demanded at the time of trial.

33. Paragraph 33 states a conclusion of law to which no reply is necessary. Nevertheless, if a reply is deemed necessary, the same is denied and strict proof thereof is demanded at the time of trial.

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81. Paragraph 81 states historical events and conclusions of law to which no reply is necessary. Nevertheless, if a reply is

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98. Paragraph 98 states historical events and conclusions of law to which no reply is necessary. Nevertheless, if a reply is deemed necessary, the same is denied and strict proof thereof is demanded at the time of trial.

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

Respectfully submitted,

GILL, McMANAMON & GHANER

/s/ Peter M. McManamon  
Peter M. McManamon, Esquire  
Supreme Court ID No. 43235  
200 Penn Street  
Huntingdon, PA 16652  
814-643-2460  
Attorney for Huntingdon County  
Board of Elections

CERTIFICATE OF SERVICE

I, Peter M. McManamon, certify that on July 10, 2020, I served the foregoing Answer to Complaint sent automatically by CM/ECF on the following counsel who are registered as CM/ECF filing users who have consented to accepting electronic service through CM/ECF:

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Counsel for Plaintiff

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317-554-7997  
[Matthew.morgan@electionlawllc.com](mailto:Matthew.morgan@electionlawllc.com)

Date: July 10, 2020

/s/ Peter M. McManamon  
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Board of Elections