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*Attorneys for Defendant Coconino County*  
6 *Recorder Patty Hansen*

7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF ARIZONA**

9 Mi Familia Vota; Arizona Coalition for  
Change; Living United for Change in  
Arizona; and League of Conservation  
10 Voters, Inc. d/b/a Chispa AZ,

11 Plaintiff,

12 v.

13 Katie Hobbs, in her official capacity as  
Arizona Secretary of State; Mark Brnovich,  
14 In his official capacity as Arizona Attorney  
General; and the County Recorder  
15 Defendants, Apache County Recorder  
Larry Noble; Cochise County Recorder  
16 David W. Stevens; Coconino County  
Recorder Patty Hansen; Gila County  
17 Recorder Sadie Jo Bingham; Graham  
County Recorder Wendy John; Greenlee  
18 County Recorder Sharie Milheiro; La Paz  
County Recorder Richard Garcia; Maricopa  
19 County Recorder Stephen Richer; Mohave  
County Recorder Kristi Blair; Navajo  
20 County Recorder Michael Sample; Pima  
County Recorder Gabriella Cazares-Kelly;  
21 Pinal County Recorder Virginia Ross;  
Santa Cruz County Recorder Suzanne

Case No.: 2:21-cv-01423-DWL

**DEFENDANT COCONINO  
COUNTY RECORDER PATTY  
HANSEN'S  
ANSWER TO COMPLAINT**

1 Sainz; Yavapai County Recorder Leslie M.  
2 Hoffman; and Yuma County Recorder  
3 Robyn S. Pouquette, in their official  
4 Capacities,

Defendants.

5 The Federal Rules of Civil Procedure 8 and 12 require that a Defendant Coconino  
6 County Recorder Patty Hansen timely serve a responsive pleading, and when the pleading is  
7 an Answer, to respond to allegations made. As set forth in their Answer below, Defendant  
8 Coconino County Recorder Patty Hansen (hereinafter “Defendant Hansen”), in her official  
9 capacity, affirmatively states that she is a nominal party to this litigation and her inclusion in  
10 this action is nominal only. Defendant Hansen takes no position with regard to the  
11 constitutionality of Senate Bill 1485 (the “Voter Purge law”) and Senate Bill 1003 (the  
12 “Cure Period Law”). Defendant Hansen will comply with the Federal Rules of Civil  
13 Procedure and orders of the Court entered into relative to this case.

14 Defendant Hansen answers Plaintiffs’ Complaint as follows:

15 **PRELIMINARY STATEMENT**

16 1. Defendant Hansen Answers Paragraph 1 of Plaintiffs’ Complaint and admits  
17 that there were two changes to Arizona’s early-voting system, the “Voter Purge Law” and  
18 the “Cure Period Law.” Defendant Hansen asserts that she is without knowledge or  
19 information sufficient to form a belief as to the truth of the remaining allegations contained  
20 therein. Nonetheless, Defendant Hansen responds that she was a defendant in litigation  
21 titled *Navajo Nation, et al., v. Hobbs, et al.*, No. CV-18-08329-PCT-DWL (D. Ariz.)  
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1 rights have been violated or whether Plaintiffs are entitled to any relief under the statute.

2 4. Defendant Hansen Answers Paragraphs 6, 7, and 8 and admits the allegations  
3 contained therein.

4 **PARTIES**

5 **A. Plaintiffs**

6 5. Defendant Hansen Answers Paragraphs 9, 10, 11, 12, 13, 14, 15, 16, 17, 18,  
7 19, and 20 that she without knowledge or information sufficient to form a belief as to the  
8 allegations therein.

9 **B. State Defendants**

10 6. Defendant Hansen Answers Paragraphs 21 and 23 regarding defendants Katie  
11 Hobbs and Mark Brnovich, and admits the allegations therein.

12 7. Defendant Hansen Answers Paragraphs 22 and 24 regarding defendants Katie  
13 Hobbs and Mark Brnovich acting under color of state law, that the allegations constitute  
14 legal conclusions, to which Defendant Hansen states that she is a nominal party to the  
15 matter and takes no position.

16 **C. County Recorder Defendants**

17 8. Defendant Hansen Answers Paragraphs 25, 26, and 27, 29, 30, 31, 32, 33, 34,  
18 35, 36, 37, 38, 39, and 40, and admits the allegations therein.

19 9. Defendant Hansen Answers Paragraph 28, and admits the allegations therein,  
20 and reiterates that she is a nominal party to this matter.

21 **FACTS**

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1 truth of the allegations in Plaintiff’s Complaint, Paragraphs 69.

2 15. Defendant Hansen Answers Paragraphs 70, 71, 72, and admits the allegations  
3 stated therein.

4 16. Defendant Hansen Answers Paragraphs 73, 74, 75, 76, 77, 78, 79, 80, 81, 82,  
5 83, and 84 stating that she is without knowledge or information sufficient to form a belief  
6 as to the truth of the allegations contained therein or that the allegations contained therein  
7 are legal conclusions to which no response is required.

8 **B. SB 1003 – The Cure Period Law.**

9 17. Defendant Hansen Answers Paragraphs 85 and 86 and admits the allegations  
10 stated therein.

11 18. Defendant Hansen Answers Paragraphs 87, 88, 89, 90, 91, 92, 93, 94, and 95,  
12 stating that she is without knowledge or information sufficient to form a belief as to the  
13 truth of the allegations contained therein or that the allegations contained therein are legal  
14 conclusions to which no response is required.

15 19. Defendant Hansen Answers Paragraph 96 stating that she is a nominal party to  
16 the matter and is without knowledge or information sufficient to form a belief as to the  
17 truth of the allegations in Plaintiff’s Complaint, Paragraph 96. Defendant Hansen further  
18 responds that as a defendant in litigation titled *Navajo Nation, et al., v. Hobbs, et al.*, No.  
19 CV-18-08329-PCT-DWL (D. Ariz.), Defendant Hansen agreed to provide voters who had  
20 submitted a ballot with an unsigned ballot affidavit the same 5-day period of time to cure  
21 their ballot deficiency as provided to those voters whose signatures were determined to not  
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1 match their registration and those voters who did not provide photo identification upon  
2 voting at a polling place or voting center. The Voter Purge Law and its identical language  
3 contained in the current Elections Procedures Manual prevent Defendant Hansen from  
4 providing this remedy as offered in the settlement agreement.

5 **IV. Arizona’s History of Discrimination and Voter Suppression.**

6 20. Defendant Hansen Answers Paragraphs 97, 98, and 99, stating that she is  
7 without knowledge or information sufficient to form a belief as to the truth of the  
8 allegations contained therein or that the allegations contained therein are legal conclusions  
9 to which no response is required.

10 **A. Arizona’s History of Discrimination in Voting.**

11 21. Defendant Hansen Answers Paragraphs 100, 101, 102, 103, 104, 105, 106,  
12 107, 108, 109, 110, and 111, stating that stating that she is without knowledge or  
13 information sufficient to form a belief as to the truth of the allegations contained therein or  
14 that the allegations contained therein are legal conclusions to which no response is  
15 required.

16 **B. Arizona’s History of Other Systemic Discrimination.**

17 22. Defendant Hansen Answers Paragraphs 112, 113, 114, 115, 116, 117, 118,  
18 119, and 120, stating that stating that she is without knowledge or information sufficient to  
19 form a belief as to the truth of the allegations contained therein or that the allegations  
20 contained therein are legal conclusions to which no response is required.

21 **C. The Effects on Voting of Arizona’s History of Discrimination.**

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23





1 states the allegations contained therein constitute legal conclusions to which no response is  
2 required.

3 **THIRD CAUSE OF ACTION**

4 **Voting Rights Act § 2**

5 **52 U.S.C. § 10301 et seq.; 42 U.S.C. § 1983; 28 U.S.C. §§ 2201, 2202**

6 **Intentional Racial Discrimination**

7 28. Defendant Hansen Answers Paragraph 142 and realleges and incorporates by  
8 reference all prior paragraphs of her Answer, as if fully set forth herein.

9 29. Defendant Hansen Answers Paragraphs 143, 144, and 145, and states the  
10 allegations contained therein constitute legal conclusions to which no response is required.

11 **PRAYER FOR RELIEF**

12 WHEREFORE, having fully responded to Plaintiffs' Complaint, Defendant Hansen  
13 respectfully requests:  
14

15 1. That this Court designate Defendant Hansen as a nominal party and to deny  
16 Plaintiffs any award of costs or attorneys fees as against Defendant Hansen;

17 2. Defendant Hansen reiterates that she takes no position in regard to the merits  
18 of the Complaint and will abide by whatever relief the Court may grant and whatever order  
19 or judgment the Court may enter.  
20

21 DATED: November 15, 2021  
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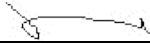
WILLIAM P. RING  
Coconino County Attorney

/s/Rose Winkeler  
Rose Winkeler  
Deputy County Attorney

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**CERTIFICATE OF SERVICE**

I hereby certify that on **November 15, 2021**, I electronically filed and served the foregoing DEFENDANT COCONINO COUNTY’S ANSWER TO COMPLAINT to the parties in this action using the CM/ECF court filing system.

By: /s/ 

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