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14 Attorneys for Defendant Maricopa County  
15 Recorder Stephen Richer

16 **IN THE UNITED STATES DISTRICT COURT**  
17 **FOR THE DISTRICT OF ARIZONA**

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

22 Plaintiffs,

23 v.

24 Katie Hobbs, in her official capacity as  
25 Arizona Secretary of State; Mark  
26 Brnovich, in his official capacity as  
27 Arizona Attorney General; and the  
28 County Recorder Defendants, Apache  
County Recorder Larry Noble; Cochise  
County Recorder David W. Stevens;  
Coconino County Recorder Patty Hansen;  
Gila County Recorder Sadie Jo Bingham;  
Graham County Recorder Wendy John;  
Greenlee County Recorder Sharie  
Milheiro; La Paz County Recorder

No. CV-21-1423-PHX-DWL

**DEFENDANT MARICOPA COUNTY  
RECORDER STEPHEN RICHER'S  
ANSWER**

1 Richard Garcia; Maricopa County  
2 Recorder Stephen Richer; Mohave  
3 County Recorder Kristi Blair; Navajo  
4 County Recorder Michael Sample; Pima  
5 County Recorder Gabriella Cázares-  
6 Kelly; Pinal County Recorder Virginia  
7 Ross; Santa Cruz County Recorder  
8 Suzanne Sainz; Yavapai County Recorder  
9 Leslie M. Hoffman; and Yuma County  
10 Recorder Robyn S. Pouquette, in their  
11 official capacities,

12 Defendants.

13 Defendant Maricopa County Recorder Stephen Richer (the “Maricopa County  
14 Recorder”) states as his Answer to the Plaintiffs’ Complaint as follows:

15 **PREFATORY STATEMENT**

16 The Maricopa County Recorder is a nominal, results-only defendant in this matter.  
17 He takes no position on the substantive questions concerning the laws that the Plaintiffs  
18 challenge. He is truly a neutral party, present in this lawsuit only because he is made  
19 responsible by statute to implement the challenged laws, and will do whatever this Court (or  
20 an appellate court) orders.

21 Every allegation made by the Plaintiffs in their Complaint, which is not expressly  
22 admitted in this Answer, is denied. Also, the Maricopa County Recorder’s admittance that  
23 various authorities, media reports, studies, statements, and the like “speak for themselves”  
24 does not indicate the Maricopa County Recorder opinion as to their veracity.

25 **ANSWER TO THE COMPLAINT’S ALLEGATIONS**

26 1. ADMITS that the lawsuit concerns Senate Bills 1003 and 1485, which speak  
27 for themselves. LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to form belief  
28 as to allegations concerning whether the challenged laws make voting more difficult or  
“practically impossible” for any voter.

2. LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief

1 as to all factual allegations. The legal allegations require no response.

2 3. LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief  
3 as to the truth of all factual allegations. The legal allegations require no response.

4 4. LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief  
5 as to the truth of all allegations.

6 5. ADMITS Plaintiffs bring their action pursuant to 42 U.S.C. §§ 1983 and  
7 1988, and ADMITS that Plaintiffs allege their First, Fourteenth, and Fifteenth Amendment  
8 rights and rights provided by the Voting Rights Act of 1965 are violated. Whether in fact  
9 any rights are violated is a legal question requiring no response.

10 6. ADMITS this Court has jurisdiction as described in this paragraph.

11 7. ADMITS this Court has jurisdiction as described in this paragraph.

12 8. ADMITS that venue is proper as described in this paragraph.

13 9. LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief  
14 as to the truth of all allegations.

15 10. LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief  
16 as to the truth of all allegations.

17 11. LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief  
18 as to the truth of all allegations.

19 12. LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief  
20 as to the truth of all allegations.

21 13. LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief  
22 as to the truth of all allegations.

23 14. LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief  
24 as to the truth of all allegations.

25 15. LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief  
26 as to the truth of all allegations.

27 16. LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief  
28 as to the truth of all allegations.

1           17.     LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief  
2 as to the truth of all allegations.

3           18.     LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief  
4 as to the truth of all allegations.

5           19.     LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief  
6 as to the truth of all allegations.

7           20.     LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief  
8 as to the truth of all allegations.

9           21.     ADMITS the allegations of this paragraph.

10          22.     ADMITS the allegations of this paragraph.

11          23.     ADMITS the allegations of this paragraph.

12          24.     ADMITS the allegations of this paragraph.

13          25.     ADMITS the second sentence of this paragraph. The remaining allegations  
14 of this paragraph are legal in nature and no response is required.

15          26.     ADMITS the allegations of this paragraph.

16          27.     ADMITS the allegations of this paragraph.

17          28.     ADMITS the allegations of this paragraph.

18          29.     ADMITS the allegations of this paragraph.

19          30.     ADMITS the allegations of this paragraph.

20          31.     ADMITS the allegations of this paragraph.

21          32.     ADMITS the allegations of this paragraph.

22          33.     ADMITS the allegations of this paragraph.

23          34.     ADMITS the allegations of this paragraph.

24          35.     ADMITS the allegations of this paragraph.

25          36.     ADMITS the allegations of this paragraph.

26          37.     ADMITS the allegations of this paragraph.

27          38.     ADMITS the allegations of this paragraph.

28          39.     ADMITS the allegations of this paragraph.

1 40. ADMITS the allegations of this paragraph.

2 41. ADMITS the allegations of this paragraph.

3 42. The authorities cited speak for themselves.

4 43. The authorities cited speak for themselves.

5 44. The Plaintiffs cite no authority for the allegations in this paragraph, and the  
6 Maricopa County Recorder LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to  
7 form a belief as to their truth.

8 45. The Plaintiffs cite no authority for the allegations in this paragraph, and the  
9 Maricopa County Recorder LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to  
10 form a belief as to their truth.

11 46. LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief  
12 as to the truth of all allegations.

13 47. The website cited in the first sentence speaks for itself. The second sentence  
14 makes allegations about the presence or absence of “widespread election fraud in connection  
15 with Arizona’s vote-by-mail system[,]” but cites no authority to support the allegations.  
16 Although the Maricopa County Recorder is personally not aware of any such “widespread  
17 election fraud” having occurred in Arizona, he LACKS KNOWLEDGE OR  
18 INFORMATION SUFFICIENT to form a belief as to the truth of Plaintiffs’ allegations.

19 48. ADMITS that the Maricopa County Recorder’s Office faced challenges in  
20 conducting the Recorder’s election-related responsibilities as a result of the COVID-19  
21 pandemic. Because Plaintiffs cite to no authority for the remainder of their allegations about  
22 voting in Arizona, the Recorder cannot evaluate the veracity of the allegations. He therefore  
23 LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief as to the truth  
24 of the remaining allegations in this paragraph.

25 49. The Plaintiffs cite no authority for the allegations in this paragraph, and the  
26 Maricopa County Recorder LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to  
27 form a belief as to their truth.

28 50. The authorities cited speak for themselves. The Maricopa County Recorder

1 LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief as to the truth  
2 of all other allegations in this paragraph.

3 51. ADMITS that “some officials in Arizona and around the country” “spread[]  
4 false and discredited theories that the 2020 elections were affected by widespread voter  
5 fraud.” To the extent that Plaintiffs allege that “[t]he historic turnout in 2020” was not  
6 “celebrat[ed],” that allegation is DENIED. Plaintiffs cite no authority for the remainder of  
7 the allegations in this paragraph, and so the Maricopa County Recorder LACKS  
8 KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief as to the truth of all  
9 other allegations in this paragraph.

10 52. ADMITS the allegations in this paragraph as applied to the 2020 general  
11 election.

12 53. ADMITS the allegations in this paragraph as applied to the 2020 general  
13 election.

14 54. ADMITS.

15 55. ADMITS.

16 56. The cited authorities speak for themselves. The Plaintiffs cite no authority  
17 for the final sentence of this paragraph, and the Maricopa County Recorder LACKS  
18 KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief as to its truth or  
19 falsehood.

20 57. The Plaintiffs cite no authority for the first sentence of this paragraph, and the  
21 Maricopa County Recorder LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to  
22 form a belief as to its truth or falsehood. The Maricopa County Recorder ADMITS,  
23 however, that the Maricopa County Elections Department facilitated the statutorily-required  
24 hand-count audit, conducted by the political parties, of the ballots cast at 2% of the voting  
25 locations in the November 3, 2020 general election. The Maricopa County Recorder further  
26 ADMITS that the hand-count audit just described resulted in 100% accuracy when compared  
27 with the machine tabulation count. The Maricopa County Recorder LACKS KNOWLEDGE  
28 OR INFORMATION SUFFICIENT to form a belief as to the truth or falsehood of the date

1 alleged in the second sentence. ADMITS all remaining allegations.

2 58. ADMITS that an entity called Cyber Ninjas “conduct[ed]” what it and some  
3 others referred to as “an ‘audit’” of the 2020 election results in Maricopa County. The  
4 Maricopa County Recorder LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to  
5 form a belief as to the truth of all remaining allegations in this paragraph.

6 59. LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief  
7 as to the truth of all allegations in this paragraph. The Maricopa County Recorder notes,  
8 however, that there were government and news media reports that Cyber Ninjas and/or its  
9 subcontractors engaged in practices that were not consistent with the generally-accepted  
10 “best practices” used by those who conduct audits and/or recounts of election contests.

11 60. The cited authority media report for itself. LACKS KNOWLEDGE OR  
12 INFORMATION SUFFICIENT to form a belief as to the truth of all allegations in this  
13 paragraph.

14 61. ADMITS that there were reports that Cyber Ninjas and/or its subcontractors  
15 and/or its volunteer workers scanned ballots with UV lights and inspected ballots for traces  
16 of bamboo to determine if they were imported from Asia. LACKS KNOWLEDGE OR  
17 INFORMATION SUFFICIENT to form a belief as to the truth of all other allegations in this  
18 paragraph.

19 62. The cited media reports speak for themselves.

20 63. The cited website in the first two sentences speaks for itself. Plaintiff cites  
21 no authority for the allegations in the third sentence and the Maricopa County Recorder  
22 LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief as to their  
23 truth.

24 64. LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief  
25 as to the truth of all allegations in this paragraph.

26 65. The cited Brennan Center report speaks for itself. LACKS KNOWLEDGE  
27 OR INFORMATION SUFFICIENT to form a belief as to the truth of all allegations in this  
28 paragraph.

1           66.     ADMITS that “courts” have “review[ed]” the 2020 general election  
2 conducted in Maricopa County and found no evidence of widespread voter fraud that  
3 undermined the integrity of Arizona’s 2020 election. ADMITS that the legally-required  
4 “official audits” occurred in Maricopa County. ADMITS that additional, legally-authorized  
5 “official audits” of tabulation equipment used to conduct the 2020 general election in  
6 Maricopa County were conducted by forensic auditors retained by Maricopa County.  
7 ADMITS that none of the forementioned “official audits” found evidence of widespread  
8 voter fraud that undermined the integrity of Arizona’s 2020 election. LACKS  
9 KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief as to the truth of all  
10 other allegations in this paragraph.

11           67.     The cited media report speaks for itself. LACKS KNOWLEDGE OR  
12 INFORMATION SUFFICIENT to form a belief as to the truth of all allegations in this  
13 paragraph.

14           68.     ADMITS that the Arizona legislature passed Senate Bills 1003 and 1485.  
15 LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief as to the truth  
16 of all other allegations in this paragraph.

17           69.     ADMITS that, as of November 5, 2021 (the date that the Answer to this  
18 paragraph was prepared by the Maricopa County Recorder’s attorneys), there were more  
19 than 2.6 million registered voters in Maricopa County, and more than 2 million of those  
20 registered voters were on the Active Early Voting List (what was formerly known as the  
21 Permanent Early Voting List). Plaintiffs cite no authority for the remaining allegations in  
22 this paragraph, and the Maricopa County Recorder LACKS KNOWLEDGE OR  
23 INFORMATION SUFFICIENT to form a belief as to their truth or falsity.

24           70.     The Plaintiffs have correctly stated the legal requirements regarding when  
25 ballots must be sent to those registered voters who have signed up for what was formerly  
26 called the permanent early voting list. The Plaintiffs have also correctly stated the legal  
27 requirement that such voters do not need to request a ballot for each individual election. The  
28 Maricopa County Recorder LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to



1 form a belief as to the truth of all other allegations in this paragraph.

2 71. SB 1485 speaks for itself.

3 72. SB 1485 speaks for itself.

4 73. LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief  
5 as to the truth of all allegations in this paragraph.

6 74. The Brennan Center study speaks for itself. The Maricopa County Recorder  
7 LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief as to the truth  
8 of all allegations in this paragraph.

9 75. The Pew Research Center study speaks for itself. The Maricopa County  
10 Recorder LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief as  
11 to the truth of all allegations in this paragraph.

12 76. The Plaintiffs cite no authority to support the allegations contained in this  
13 paragraph, and the Maricopa County Recorder LACKS KNOWLEDGE OR  
14 INFORMATION SUFFICIENT to form a belief as to the truth of all allegations in this  
15 paragraph.

16 77. The Plaintiffs cite no authority to support the allegations contained in this  
17 paragraph, and the Maricopa County Recorder LACKS KNOWLEDGE OR  
18 INFORMATION SUFFICIENT to form a belief as to the truth of all allegations in this  
19 paragraph.

20 78. The Plaintiffs cite no authority to support the allegations contained in this  
21 paragraph, and the Maricopa County Recorder LACKS KNOWLEDGE OR  
22 INFORMATION SUFFICIENT to form a belief as to the truth of all allegations in this  
23 paragraph.

24 79. The Plaintiffs cite no authority to support the allegations contained in this  
25 paragraph, and the Maricopa County Recorder LACKS KNOWLEDGE OR  
26 INFORMATION SUFFICIENT to form a belief as to the truth of all allegations in this  
27 paragraph.

28 80. The Plaintiffs cite no authority to support the allegations contained in this

1 paragraph, and the Maricopa County Recorder LACKS KNOWLEDGE OR  
2 INFORMATION SUFFICIENT to form a belief as to the truth of all allegations in this  
3 paragraph.

4 81. A.R.S. s 16-544(L) speaks for itself. The Plaintiffs cite no authority to  
5 support the allegations contained in this paragraph, and the Maricopa County Recorder  
6 LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief as to the truth  
7 of all allegations in this paragraph.

8 82. The Plaintiffs cite no authority to support the allegations contained in this  
9 paragraph, and the Maricopa County Recorder LACKS KNOWLEDGE OR  
10 INFORMATION SUFFICIENT to form a belief as to the truth of all allegations in this  
11 paragraph.

12 83. The Plaintiffs cite no authority to support the allegations contained in this  
13 paragraph, and the Maricopa County Recorder LACKS KNOWLEDGE OR  
14 INFORMATION SUFFICIENT to form a belief as to the truth of all allegations in this  
15 paragraph.

16 84. LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief  
17 as to the truth of all allegations in this paragraph.

18 85. ADMITS that in past elections the Maricopa County Recorder has received  
19 unsigned early ballot affidavits and affidavits with signatures that appear not to match voter  
20 registration records. The cited laws speak for themselves. The Maricopa County Recorder  
21 LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief as to the truth  
22 of all other allegations in this paragraph, including the allegations contained in footnote 21.

23 86. A.R.S. § 16-550(A) and SB 1003 speak for themselves.

24 87. A.R.S. § 16-548(A) speaks for itself. The Maricopa County Recorder  
25 LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief as to the truth  
26 of all other allegations in this paragraph.

27 88. A.R.S. § 16-550(A) speaks for itself.

28 89. A.R.S. § 16-550(A) speaks for itself. The Maricopa County Recorder

1 LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief as to the truth  
2 of all other allegations in this paragraph.

3 90. LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief  
4 as to the truth of all allegations in this paragraph.

5 91. DENIES that Maricopa County election officials “deprive many Native  
6 American voters who live on reservations of reasonable access to polling places and election  
7 offices.” LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief as  
8 to the truth of all other allegations in this paragraph.

9 92. LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief  
10 as to the truth of all allegations in this paragraph.

11 93. SB 1003 speaks for itself. LACKS KNOWLEDGE OR INFORMATION  
12 SUFFICIENT to form a belief as to the truth of all other allegations in this paragraph.

13 94. SB 1003 speaks for itself. LACKS KNOWLEDGE OR INFORMATION  
14 SUFFICIENT to form a belief as to the truth of all other allegations in this paragraph.

15 95. SB 1003 speaks for itself. LACKS KNOWLEDGE OR INFORMATION  
16 SUFFICIENT to form a belief as to the truth of all other allegations in this paragraph.

17 96. DENIES that “[a]llowing post-election curing of unsigned mail-in ballots  
18 would not pose any administrative or financial burdens on” Maricopa County “election  
19 officials.” LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief as  
20 to the truth of all other allegations in this paragraph.

21 97. LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief  
22 as to the truth of all allegations in this paragraph.

23 98. The 1848 Treaty of Guadalupe Hidalgo and the 1853 Gadsden Purchase speak  
24 for themselves. The Plaintiffs cite no authority for the remaining allegations in this  
25 paragraph, and the Maricopa County Recorder LACKS KNOWLEDGE OR  
26 INFORMATION SUFFICIENT to form a belief as to their truth.

27 99. The Plaintiffs cite no authority for the allegations in this paragraph, and the  
28 Maricopa County Recorder LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to

1 form a belief as to their truth.

2 100. The Plaintiffs cite no authority for the allegations in this paragraph, and the  
3 Maricopa County Recorder LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to  
4 form a belief as to their truth.

5 101. The Plaintiffs cite no authority for the allegations in this paragraph, and the  
6 Maricopa County Recorder LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to  
7 form a belief as to their truth.

8 102. The court decisions speak for themselves. The Plaintiffs cite no authority for  
9 the remaining allegations in this paragraph, and the Maricopa County Recorder LACKS  
10 KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief as to their truth.

11 103. The Plaintiffs cite no authority for the allegations in this paragraph, and the  
12 Maricopa County Recorder LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to  
13 form a belief as to their truth.

14 104. The Plaintiffs cite no authority for the allegations in this paragraph, and the  
15 Maricopa County Recorder LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to  
16 form a belief as to their truth.

17 105. The cited authority speaks for itself. The Maricopa County Recorder LACKS  
18 KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief as to the truth of all  
19 allegations in this paragraph.

20 106. The cited authority speaks for itself. The Maricopa County Recorder LACKS  
21 KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief as to the truth of all  
22 allegations in this paragraph.

23 107. The Voting Rights Act speaks for itself. The Plaintiffs cite no authority for  
24 the remaining allegations in this paragraph, and the Maricopa County Recorder LACKS  
25 KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief as to their truth.

26 108. The Plaintiffs cite no authority for the allegations in this paragraph, and the  
27 Maricopa County Recorder LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to  
28 form a belief as to their truth.

1           109. DENIES that a presidential *primary* election was conducted in Maricopa  
2 County in 2016 or 2008. ADMITS that voters in Maricopa County stood in lines to vote  
3 during the 2016 presidential *preference* election. The Plaintiffs cite no authority for their  
4 allegations in this paragraph, and the current Maricopa County Recorder LACKS  
5 KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief as to their truth.

6           110. The cited letter speaks for itself.

7           111. The cited materials speak for themselves.

8           112. The Plaintiffs cite no authority for the allegations in this paragraph, and the  
9 Maricopa County Recorder LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to  
10 form a belief as to their truth.

11           113. The Plaintiffs cite no authority for the allegations in this paragraph, and the  
12 Maricopa County Recorder LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to  
13 form a belief as to their truth.

14           114. The Plaintiffs cite no authority for the allegations in this paragraph, and the  
15 Maricopa County Recorder LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to  
16 form a belief as to their truth.

17           115. The Plaintiffs cite no authority for the allegations in this paragraph, and the  
18 Maricopa County Recorder LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to  
19 form a belief as to their truth.

20           116. The Plaintiffs cite no authority for the allegations in this paragraph, and the  
21 Maricopa County Recorder LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to  
22 form a belief as to their truth.

23           117. Th authority cited speaks for itself. The Plaintiffs cite no authority for the  
24 remaining allegations in this paragraph, and the Maricopa County Recorder LACKS  
25 KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief as to their truth.

26           118. The cited authority speaks for itself. The Plaintiffs cite no authority for the  
27 remaining allegations in this paragraph, and the Maricopa County Recorder LACKS  
28 KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief as to their truth.

1           119. The Plaintiffs cite no authority for the allegations in this paragraph, and the  
2 Maricopa County Recorder LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to  
3 form a belief as to their truth.

4           120. The cited study speaks for itself.

5           121. The Plaintiffs cite no authority for the allegations in this paragraph, and the  
6 Maricopa County Recorder LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to  
7 form a belief as to their truth.

8           122. The cited study speaks for itself. The Plaintiffs cite no authority for the  
9 remaining allegations in this paragraph, and the Maricopa County Recorder LACKS  
10 KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief as to their truth.

11           123. The cited report speaks for itself.

12           124. The Plaintiffs cite no authority for the allegations in this paragraph, and the  
13 Maricopa County Recorder LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to  
14 form a belief as to their truth.

15           125. The Plaintiffs cite no authority for the allegations in this paragraph, and the  
16 Maricopa County Recorder LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to  
17 form a belief as to their truth.

18           126. LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief  
19 as to the truth of the allegations contained in this paragraph.

20           127. The Maricopa County Recorder realleges all proceeding allegations and  
21 incorporates them by reference as if fully restated herein.

22           128. The Due Process Clause speaks for itself.

23           129. The First Amendment speaks for itself.

24           130. The cited decision speaks for itself.

25           131. The cited decision speaks for itself.

26           132. LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief  
27 as to the truth of the allegations contained in this paragraph.

28           133. The allegation concerning what constitutes “a legitimate state interest” is a

1 legal allegation to which no response is required. LACKS KNOWLEDGE OR  
2 INFORMATION SUFFICIENT to form a belief as to the truth of the allegations contained  
3 in this paragraph.

4 134. States a legal conclusion to which no response is required.

5 135. States a legal conclusion to which no response is required.

6 136. The Maricopa County Recorder realleges all proceeding allegations and  
7 incorporates them by reference as if fully restated herein.

8 137. The Fourteenth Amendment speaks for itself.

9 138. The Fifteenth Amendment speaks for itself.

10 139. The Fourteenth and Fifteenth Amendments, and the court decision cited,  
11 speak for themselves.

12 140. The first sentence of this paragraph alleges a legal conclusion to which no  
13 response is required. The Maricopa County Recorder LACKS KNOWLEDGE OR  
14 INFORMATION SUFFICIENT to form a belief as to the truth of all other allegations  
15 contained in this paragraph.

16 141. LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief  
17 as to the truth of the allegations contained in this paragraph.

18 142. The Maricopa County Recorder realleges all proceeding allegations and  
19 incorporates them by reference as if fully restated herein.

20 143. Section 2 of the Voting Rights Act speaks for itself.

21 144. The first sentence of this paragraph alleges a legal conclusion to which no  
22 response is required. The Maricopa County Recorder LACKS KNOWLEDGE OR  
23 INFORMATION SUFFICIENT to form a belief as to the truth of all other allegations  
24 contained in this paragraph.

25 145. LACKS KNOWLEDGE OR INFORMATION SUFFICIENT to form a belief  
26 as to the truth of the allegations contained in this paragraph.

27 **RESPONSE TO PRAYER FOR RELIEF**

28 The Maricopa County Recorder takes no position on the substantive questions

1 concerning the laws that the Plaintiffs challenge, and so takes no position concerning  
2 whether the Court should grant the relief that the Plaintiffs request.

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RESPECTFULLY SUBMITTED this 15th day of November, 2021.

ALLISTER ADEL  
MARICOPA COUNTY ATTORNEY

BY: /s/ Joseph E. La Rue  
JOSEPH E. LA RUE  
JOSEPH J. BRANCO  
Deputy County Attorneys  
*Attorneys for Defendant Maricopa County  
Recorder*

**CERTIFICATE OF SERVICE**

I hereby certify that on November 15, 2021, I caused the foregoing document to be electronically transmitted to the Clerk's Office using the CM/ECF System for filing and served on counsel of record via the Court's CM/ECF system.

/s/ V. Sisneros