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 and Republican National Committee*

**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**

**IN AND FOR THE COUNTY OF MARICOPA**

LAURIE AGUILERA, *et al.*,  
 Plaintiffs,

v.

ADRIAN FONTES, *et al.*,  
 Defendants.

No. CV2020-014083

**[PROPOSED] ANSWER OF THE  
 INTERVENORS TO THE VERIFIED  
 COMPLAINT FOR A SPECIAL  
 ACTION**

(Before the Hon. Margaret Mahoney)

Intervenors Donald J. Trump for President, Inc. and the Republican National

1 Committee (together, the “Intervenors”) hereby answer the Verified Complaint for a  
2 Special Action (the “Complaint”) as follows:

3 1.1 Intervenors are without knowledge or information sufficient to form a belief  
4 as to the truth of the allegations in paragraph 1.1 of the Complaint, and therefore deny them.

5 1.2 Intervenors are without knowledge or information sufficient to form a belief  
6 as to the truth of the allegations in paragraph 1.2 of the Complaint, and therefore deny them.

7 1.3 Intervenors are without knowledge or information sufficient to form a belief  
8 as to the truth of the allegations in paragraph 1.3 of the Complaint, and therefore deny them.

9 1.4 Intervenors admit the allegations in paragraph 1.4 of the Complaint.

10 1.5 Intervenors admit the allegations in paragraph 1.5 of the Complaint.

11 1.6 Intervenors admit the allegations in paragraph 1.6 of the Complaint.

12 1.7 Intervenors admit the allegations in paragraph 1.7 of the Complaint.

13 1.8 Intervenors are without knowledge or information sufficient to form a belief  
14 as to the truth of the allegations in paragraph 1.8 of the Complaint, and therefore deny them.

15 1.9 Plaintiffs admit the allegations in paragraph 1.9 of the Complaint.

16 1.10 The allegations in paragraph 1.10 of the Complaint state legal conclusions to  
17 which no response is required. To the extent a response is deemed necessary, Intervenors  
18 deny the allegations in paragraph 1.10 of the Complaint.

19 1.11 The allegations in paragraph 1.11 of the Complaint state legal conclusions to  
20 which no response is required. To the extent a response is deemed necessary, Intervenors  
21 deny the allegations in paragraph 1.11 of the Complaint.

22 1.12 Intervenors admit the allegations in paragraph 1.12 of the Complaint.

23 1.13 Intervenors admit that this Court has jurisdiction and that venue is proper,  
24 but deny any remaining allegations in paragraph 1.13 of the Complaint.

25 2.1 Intervenors incorporate their answers to the preceding paragraphs of the  
26 Complaint as if fully set forth herein.

27 2.2 Intervenors are without knowledge or information sufficient to form a belief  
28

1 as to the truth of the allegations in paragraph 2.2 of the Complaint, and therefore deny them.

2 2.3 Intervenors are without knowledge or information sufficient to form a belief  
3 as to the truth of the allegations in paragraph 2.3 of the Complaint, and therefore deny them.

4 2.4 Intervenors are without knowledge or information sufficient to form a belief  
5 as to the truth of the allegations in paragraph 2.4 of the Complaint, and therefore deny them.

6 2.5 Intervenors are without knowledge or information sufficient to form a belief  
7 as to the truth of the allegations in paragraph 2.5 of the Complaint, and therefore deny them.

8 2.6 Intervenors are without knowledge or information sufficient to form a belief  
9 as to the truth of the allegations in paragraph 2.6 of the Complaint, and therefore deny them.

10 2.7 Intervenors are without knowledge or information sufficient to form a belief  
11 as to the truth of the allegations in paragraph 2.7 of the Complaint, and therefore deny them.

12 2.8 Intervenors are without knowledge or information sufficient to form a belief  
13 as to the truth of the allegations in paragraph 2.8 of the Complaint, and therefore deny them.

14 2.9 Intervenors are without knowledge or information sufficient to form a belief  
15 as to the truth of the allegations in paragraph 2.9 of the Complaint, and therefore deny them.

16 2.10 Intervenors are without knowledge or information sufficient to form a belief  
17 as to the truth of the allegations in paragraph 2.10 of the Complaint, and therefore deny  
18 them.

19 2.11 Intervenors admit the allegations in paragraph 2.11 of the Complaint.

20 3.1 Intervenors incorporate their answers to the preceding paragraphs of the  
21 Complaint as if fully set forth herein.

22 3.2 Intervenors admit the allegations in paragraph 3.2 of the Complaint.

23 3.3 Intervenors admit the allegations in paragraph 3.3 of the Complaint.

24 3.4 Intervenors admit the allegations in paragraph 3.4 of the Complaint.

25 3.5 The allegations in paragraph 3.5 of the Complaint state a legal conclusion to  
26 which no response is required. To an extent a response is deemed necessary, Intervenors  
27 state that Arizona law requires that all ballots must be accurately tabulated. Intervenors  
28

1 deny any remaining allegations in paragraph 3.5 of the Complaint.

2 3.6 Intervenors are without knowledge or information sufficient to form a belief  
3 as to the truth of the allegations in paragraph 3.6 of the Complaint, and therefore deny them.

4 3.7 Intervenors admit the allegations in paragraph 3.7 of the Complaint.

5 3.8 Intervenors are without knowledge or information sufficient to form a belief  
6 as to the truth of the allegations in paragraph 3.8 of the Complaint, and therefore deny them.

7 3.9 Intervenors admit the allegations in paragraph 3.9 of the Complaint.

8 3.10 Intervenors state that the quoted excerpt from the Election Procedures  
9 Manual pertains to the use of “accessible voting equipment” and not paper ballots. To the  
10 extent paragraph 3.10 of the Complaint contains any additional allegations, Intervenors are  
11 without knowledge or information sufficient to form a belief as to their truth, and therefore  
12 deny them.

13 3.11 Intervenors are without knowledge or information sufficient to form a belief  
14 as to the truth of the allegations in paragraph 3.11 of the Complaint, and therefore deny  
15 them.

16 3.12 Intervenors admit the allegations in paragraph 3.12 of the Complaint.

17 3.13 Intervenors are without knowledge or information sufficient to form a belief  
18 as to the truth of the allegations in paragraph 3.13 of the Complaint, and therefore deny  
19 them.

20 3.14 Intervenors admit the allegations in paragraph 3.14 of the Complaint.

21 3.15 Intervenors are without knowledge or information sufficient to form a belief  
22 as to the truth of the allegations in paragraph 3.15 of the Complaint, and therefore deny  
23 them.

24 3.16 Intervenors admit the allegations in paragraph 3.16 of the Complaint.

25 3.17 Intervenors are without knowledge or information sufficient to form a belief  
26 as to the truth of the allegations in paragraph 3.17 of the Complaint, and therefore deny  
27 them.  
28

1           3.18 Intervenor is without knowledge or information sufficient to form a belief  
2 as to the truth of the allegations in paragraph 3.18 of the Complaint, and therefore deny  
3 them.

4           3.19 Intervenor is without knowledge or information sufficient to form a belief  
5 as to the truth of the allegations in paragraph 3.19 of the Complaint, and therefore deny  
6 them.

7  
8 The Plaintiffs' prayer for relief contains legal conclusions to which no response is required.  
9 To the extent a response is deemed necessary, the Intervenor states that the Court should  
10 deny the requested relief at the present time, without prejudice to the Plaintiffs' or  
11 Intervenor's right to seek these or other remedies based upon subsequently adduced facts.

12                           **AFFIRMATIVE DEFENSES AND CROSS-CLAIMS**

13           Intervenor fully reserves and does not waive their right to assert any and all affirmative  
14 defenses and/or cross-claims that arise out of the subject matter of the Complaint.

15           RESPECTFULLY SUBMITTED this 5th day of November, 2020.

16  
17                           STATECRAFT PLLC

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