

**IN THE COMMONWEALTH COURT OF PENNSYLVANIA**

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IN RE: MATTER OF THE 2016 PRESIDENTIAL ELECTION :  
: No. 659 MD 2016

PETITION OF ONE HUNDRED (100) OR MORE UNNAMED REGISTERED VOTERS OF THE COMMONWEALTH OF PENNSYLVANIA

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**ANSWER TO PETITION BY REPUBLICAN PARTY OF PENNSYLVANIA, ALL PENNSYLVANIA ELECTORS OF PRESIDENT-ELECT DONALD J. TRUMP AND VICE-PRESIDENT-ELECT MICHAEL PENCE, PRESIDENT-ELECT DONALD J. TRUMP, VICE-PRESIDENT-ELECT MICHAEL PENCE, AND DONALD J. TRUMP FOR PRESIDENT, INC.**

Respondents Republican Party of Pennsylvania, all Pennsylvania Electors of President-Elect Donald J. Trump and Vice-President-Elect Michael Pence, President-Elect Donald J. Trump, Vice-President Elect Michael Pence, and Donald J. Trump for President, Inc., answer the Petitioners’ election contest petition as follows:

1. This paragraph contains a conclusion of law to which no response is required and as such it is denied.
2. Admitted in part; denied in part. It is admitted that Petitioners’ names, addresses and voting precincts are included within their individual verifications. After reasonable investigation, Respondents are without knowledge or information sufficient to form a belief as to the truth of the allegations regarding Petitioners’

registration/voter status and whether they voted in the November 8, 2016 election and as such those allegations are denied.

3. This paragraph contains a conclusion of law to which no response is required and as such it is denied. By way of further response, Respondents specifically deny that Petitioners have a good faith basis to contest the Presidential Election and deny that the purported findings of Alex Halderman establish a good faith basis to contest the election.

4. This paragraph contains a conclusion of law to which no response is required and as such it is denied. By way of further response, Respondents specifically deny that Petitioners have a good faith basis to contest the Presidential Election and deny that any grounds exist to stay this matter pending the outcome of any other proceedings.

5. This paragraph contains a conclusion of law to which no response is required and as such it is denied. By way of further response, Respondents specifically deny that the Presidential Election was illegal and the return thereof was not correct.

6. After reasonable investigation, Respondents are without knowledge or information sufficient to form a belief as to the truth of the allegations regarding the basis for Petitioners' belief that the Presidential Election was illegal and the allegations underlying various hearsay reports of hacking and computer intrusions,

and as such those allegations are denied. By way of further response, Respondents specifically deny that the Presidential Election was illegal.

7. After reasonable investigation, Respondents are without knowledge or information sufficient to form a belief as to the truth of the allegations regarding the basis for Petitioners' concerns about the integrity of electronic voting machines used in their districts and as such those allegations are denied. By way of further response, Respondents deny that the electronic voting machines used in the Presidential election lack integrity.

8. This paragraph contains various conclusion of laws to which no responses are required and as such they are denied. Further, after reasonable investigation, Respondents are without knowledge or information sufficient to form a belief as to the truth of the allegations regarding the basis for Petitioners' beliefs about the primary purpose of the various recounts they have requested or about their intended motives regarding the outcome of those recounts, and as such those allegations are denied. Finally, Respondents specifically deny that any grounds exist to stay this matter pending the outcome of any other proceedings and deny that the Presidential Election was illegal.

WHEREFORE, Respondents respectfully request that the Court enter judgment as follows:

- A. Dismiss Petitioners' claims in the petition;
- B. Determine that the claims in the petition are without probable cause;
- C. Assess costs against Petitioners under 25 P.S. § 3469; and
- D. Grant Respondents such other and further relief as the Court deems

just and proper.

Respectfully submitted,

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