

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION**

THE CHRISTIAN MINISTERIAL ALLIANCE, *et al.*,

PLAINTIFFS,

v. Case no. 4:23-cv-00471-DPM-DRS-JM (three-judge court)

**JOHN THURSTON, in his official capacity
as the Secretary of State of Arkansas,**

DEFENDANT.

ANSWER

Defendant John Thurston, in his official capacity as Secretary of State of Arkansas, responds to Plaintiffs' First Amended Complaint (Doc. No. 20) as follows:

1. Defendant denies the allegations in Paragraph 1.
2. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 2 and accordingly denies them.
3. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 3 and accordingly denies them.
4. Defendant states that the congressional plan speaks for itself and denies any remaining allegations in Paragraph 4.
5. Defendant states that the congressional plan speaks for itself and denies any remaining allegations in Paragraph 5.
6. Defendant denies the allegations in Paragraph 6.
7. Defendant denies the allegations in Paragraph 7.
8. Defendant states that the congressional plan speaks for itself and denies any remaining allegations in Paragraph 8.
9. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 9 and accordingly denies them.

10. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 10 and accordingly denies them.

11. Defendant denies the allegations in Paragraph 11.

12. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 12 and accordingly denies them.

13. Defendant states that the 2020 election results speak for themselves and deny any remaining allegations in Paragraph 13.

14. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 14 and accordingly denies them.

15. Defendant denies the allegations in Paragraph 15.

16. Defendant states that the timing of the submission of legislation is recorded on the General Assembly's public website. Defendant denies any remaining allegations in Paragraph 16.

17. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 17 and accordingly denies them.

18. Defendant states that the congressional map and the legislative debates prior to its adoption speak for themselves. Defendant denies any remaining allegations in Paragraph 18.

19. Defendant states that the congressional map and the legislative debates prior to its adoption speak for themselves. Defendant denies any remaining allegations in Paragraph 19.

20. Defendant states that the congressional map and the legislative debates prior to its adoption speak for themselves. Defendant denies any remaining allegations in Paragraph 20.

21. Defendant states that the congressional plan speaks for itself and denies any remaining allegations in Paragraph 21.

22. Defendant states that the congressional plan speaks for itself and denies any remaining allegations in Paragraph 22.

23. Defendant states that Governor Hutchinson's remarks speak for themselves and deny any remaining allegations in Paragraph 23.

24. Defendant denies the allegations in Paragraph 24.

25. Defendant states that the congressional plan speaks for itself and denies any remaining allegations in Paragraph 25.

26. Defendant states that the congressional plan speaks for itself and denies any remaining allegations in Paragraph 26.

27. Defendant denies any allegations in Paragraph 27.

28. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 28 and accordingly denies them.

29. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 29 and accordingly denies them.

30. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 30 and accordingly denies them.

31. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 31 and accordingly denies them.

32. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 32 and accordingly denies them.

33. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 33 and accordingly denies them.

34. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 34 and accordingly denies them.

35. Defendant admits he is the Arkansas Secretary of State and the Chair of the State Board of Election Commissioners. He states that Ark. Const. amend. 51, sec. 5; Ark. Admin. Code 108.00.11-1101(3); Ark. Code Ann. 7-4-101(b) speak for themselves and denies all remaining allegations in Paragraph 35.

36. Defendant states that Paragraph 36 contains legal assertions that require no response and denies all remaining allegations.

37. Defendant states that Paragraph 37 contains legal assertions that require no response and denies all remaining allegations. Additionally, Section 1983 and 1988 are not jurisdiction-conferring statutes.

38. Defendant states that Paragraph 38 contains legal assertions that require no response and denies all remaining allegations.

39. Defendant states that Paragraph 39 contains legal assertions that require no response and denies all remaining allegations.

40. Defendant admits that venue is proper under 28 U.S.C. 1391(b) and denies all remaining allegations in Paragraph 40.

41. Defendant admits that the Court has personal jurisdiction over him and denies all remaining allegations in Paragraph 40.

42. Defendant states that Paragraph 42 contains legal assertions that require no response and denies all remaining allegations.

43. Defendant states that Paragraph 43 contains legal assertions that require no response and denies all remaining allegations.

44. Defendant admits the allegations in Paragraph 44.

45. Defendant states that the General Assembly's procedures speak for themselves and deny any remaining allegations in Paragraph 45.

46. Defendant states that the General Assembly's procedures speak for themselves and deny any remaining allegations in Paragraph 46.

47. Defendant admits the allegations in Paragraph 47.

48. Defendant admits the allegations in Paragraph 48.

49. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 49 and accordingly denies them.

50. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 50 and accordingly denies them.

51. Defendant states that the 2020 Census data speaks for itself and denies any remaining allegations in Paragraph 51.

52. Defendant states that the 2020 Census data speaks for itself and denies any remaining allegations in Paragraph 52.

53. Defendant states that the 2020 Census data speaks for itself and denies any remaining allegations in Paragraph 53.

54. Defendant states that the 2020 Census data speaks for itself and denies any remaining allegations in Paragraph 54.

55. Defendant states that the 2020 Census data speaks for itself and denies any remaining allegations in Paragraph 55.

56. Defendant states that the 2011 congressional map and 2010-2020 Census data speaks for themselves and denies any remaining allegations in Paragraph 56.

57. Defendant states that the 2011 congressional map and 2010-2020 Census data speaks for themselves and denies any remaining allegations in Paragraph 57.

58. Defendant states that the Census data speaks for itself and denies any remaining allegations in Paragraph 58.

59. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 59 and accordingly denies them.

60. Defendant states that the Census data speaks for itself and denies any remaining allegations in Paragraph 60.

61. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 61 and accordingly denies them.

62. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 62 and accordingly denies them.

63. Defendant admits the allegations in Paragraph 63.

64. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 64 and accordingly denies them.

65. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 65 and accordingly denies them.

66. Defendant states that the results of any election contest speak for themselves and denies any remaining allegations in Paragraph 66.

67. Defendant states that the results of any election contest speak for themselves and denies any remaining allegations in Paragraph 67.

68. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 68 and accordingly denies them.

69. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 69 and accordingly denies them.

70. Defendant states that the results of any election contest speak for themselves and denies any remaining allegations in Paragraph 70.

71. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 71 and accordingly denies them.

72. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 72 and accordingly denies them.

73. Defendant states that the results of any election contest speak for themselves and denies any remaining allegations in Paragraph 73.

74. Defendant states that the congressional map and the legislative debates prior to its adoption speak for themselves. Defendant denies any remaining allegations in Paragraph 74.

75. Defendant states that the congressional map and the legislative debates prior to its adoption speak for themselves. Defendant denies any remaining allegations in Paragraph 75.

76. Defendant states that the congressional map and the legislative debates prior to its adoption speak for themselves. Defendant denies any remaining allegations in Paragraph 76.

77. Defendant states that the congressional map and the legislative debates prior to its adoption speak for themselves. Defendant denies any remaining allegations in Paragraph 77.

78. Defendant states that the congressional map and the legislative debates prior to its adoption speak for themselves. Defendant denies any remaining allegations in Paragraph 78.

79. Defendant states that the congressional map and the legislative debates prior to its adoption speak for themselves. Defendant denies any remaining allegations in Paragraph 79.

80. Defendant states that the congressional map and HB 1971 speak for themselves.

Defendant denies any remaining allegations in Paragraph 80.

81. Defendant states that HB 1971 speaks for itself. Defendant denies any remaining allegations in Paragraph 80.

82. Defendant states that the congressional map and the legislative debates prior to its adoption speak for themselves. Defendant denies any remaining allegations in Paragraph 82.

83. Defendant states that the congressional map and the legislative debates prior to its adoption speak for themselves. Defendant denies any remaining allegations in Paragraph 83.

84. Defendant states that the congressional map and the legislative debates prior to its adoption speak for themselves. Defendant denies any remaining allegations in Paragraph 84.

85. Defendant states that the congressional map and the legislative debates prior to its adoption speak for themselves. Defendant denies any remaining allegations in Paragraph 85.

86. Defendant states that the congressional map and the legislative debates prior to its adoption speak for themselves. Defendant denies any remaining allegations in Paragraph 86.

87. Defendant admits the allegations in Paragraph 87.

88. Defendant admits the allegations in Paragraph 88.

89. Defendant states that SB 743 speaks for itself. Defendant denies any remaining allegations in Paragraph 80.

90. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 90 and accordingly denies them.

91. Defendant states that the congressional map and the legislative debates prior to its adoption speak for themselves. Defendant denies any remaining allegations in Paragraph 91.

92. Defendant states that the votes on SB743 speak for themselves and deny any remaining allegations in Paragraph 92.

93. Defendant states that the votes on SB743 and HB1982 speak for themselves and deny any remaining allegations in Paragraph 92.

94. Defendant states that the congressional map speaks for itself and denies any remaining allegations in Paragraph 94.

95. Defendant states that the congressional map speaks for itself and denies any remaining allegations in Paragraph 95.

96. Defendant states that the congressional map speaks for itself and denies any remaining allegations in Paragraph 96.

97. Defendant states that the congressional map and the legislative debates prior to its adoption speak for themselves. Defendant denies any remaining allegations in Paragraph 97.

98. Defendant states that the congressional map and the legislative debates prior to its adoption speak for themselves. Defendant denies any remaining allegations in Paragraph 98.

99. Defendant states that the congressional map and the legislative debates prior to its adoption speak for themselves. Defendant denies any remaining allegations in Paragraph 99.

100. Defendant states that the congressional map and the legislative debates prior to its adoption speak for themselves. Defendant denies any remaining allegations in Paragraph 100.

101. Defendant states that the congressional map and the legislative debates prior to its adoption speak for themselves. Defendant denies any remaining allegations in Paragraph 101.

102. Defendant states that the congressional map and the legislative debates prior to its adoption speak for themselves. Defendant denies any remaining allegations in Paragraph 102.

103. Defendant states that the congressional map and the legislative debates prior to its adoption speak for themselves. Defendant denies any remaining allegations in Paragraph 103.

104. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 104 and accordingly denies them.

105. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 105 and accordingly denies them.

106. Defendant states that the congressional map and the legislative debates prior to its adoption speak for themselves. Defendant denies any remaining allegations in Paragraph 106.

107. Defendant states that the congressional map and the legislative debates prior to its adoption speak for themselves. Defendant denies any remaining allegations in Paragraph 107.

108. Defendant states that the congressional map and the legislative debates prior to its adoption speak for themselves. Defendant denies any remaining allegations in Paragraph 108.

109. Defendant states that the congressional map and the legislative debates prior to its adoption speak for themselves. Defendant denies any remaining allegations in Paragraph 109.

110. Defendant states that the congressional map and the legislative debates prior to its adoption speak for themselves. Defendant denies any remaining allegations in Paragraph 110.

111. Defendant states that the congressional map and the legislative debates prior to its adoption speak for themselves. Defendant denies any remaining allegations in Paragraph 111.

112. Defendant states that the congressional map and the legislative debates prior to its adoption speak for themselves. Defendant denies any remaining allegations in Paragraph 112.

113. Defendant states that the congressional map and the legislative debates prior to its adoption speak for themselves. Defendant denies any remaining allegations in Paragraph 113.

114. Defendant states that the congressional map and the legislative debates prior to its adoption speak for themselves. Defendant denies any remaining allegations in Paragraph 114.

115. Defendant states that the congressional map and the legislative debates prior to its adoption speak for themselves. Defendant denies any remaining allegations in Paragraph 115.

116. Defendant states that the congressional map and the legislative debates prior to its adoption speak for themselves. Defendant denies any remaining allegations in Paragraph 116.

117. Defendant states that Governor Hutchinson's remarks speak for themselves and deny any remaining allegations in Paragraph 117.

118. Defendant states that Governor Hutchinson's remarks speak for themselves and deny any remaining allegations in Paragraph 118.

119. Defendant states that Governor Hutchinson's remarks speak for themselves and deny any remaining allegations in Paragraph 119.

120. Defendant states that the congressional map and the legislative debates prior to its adoption speak for themselves. Defendant denies any remaining allegations in Paragraph 120.

121. Defendant states that the congressional map and the legislative debates prior to its adoption speak for themselves. Defendant denies any remaining allegations in Paragraph 121.

122. Defendant states that the congressional map and the legislative debates prior to its adoption speak for themselves. Defendant denies any remaining allegations in Paragraph 122.

123. Defendant denies the allegations in Paragraph 123.

124. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 124 and accordingly denies them.

125. Defendant states that Mayor Scott's remarks speak for themselves and denies any remaining allegations in Paragraph 125.

126. Defendant states that Ms. Curry's remarks speak for themselves and denies any remaining allegations in Paragraph 125.

127. Defendant states that Paragraph 127 contains legal assertions that require no response and denies all remaining allegations.

128. Defendant states that Paragraph 128 contains legal assertions that require no response and denies all remaining allegations.

129. Defendant states that Paragraph 129 contains legal assertions that require no response and denies all remaining allegations.

130. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 130 and accordingly denies them.

131. Defendant states that the congressional map speaks for itself and denies any remaining allegations in Paragraph 131.

132. Defendant states that the congressional map speaks for itself and denies any remaining allegations in Paragraph 132.

133. Defendant states that the congressional map speaks for itself and denies any remaining allegations in Paragraph 133.

134. Defendant states that the congressional map speaks for itself and denies any remaining allegations in Paragraph 134.

135. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 135 and accordingly denies them.

136. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 136 and accordingly denies them.

137. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 137 and accordingly denies them.

138. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 138 and accordingly denies them.

139. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 139 and accordingly denies them.

140. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 140 and accordingly denies them.

141. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 141 and accordingly denies them.

142. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 142 and accordingly denies them.

143. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 143 and accordingly denies them.

144. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 144 and accordingly denies them.

145. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 145 and accordingly denies them.

146. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 146 and accordingly denies them.

147. Defendant denies the allegations in Paragraph 147.

148. Defendant denies the allegations in Paragraph 148.

149. Defendant states that Paragraph 149 contains legal assertions that require no response and denies all remaining allegations.

150. Defendant states that Paragraph 150 contains legal assertions that require no response and denies all remaining allegations.

151. Defendant states that Paragraph 151 contains legal assertions that require no response and denies all remaining allegations.

152. Defendant states that Paragraph 152 contains legal assertions that require no response and denies all remaining allegations.

153. Defendant states that Paragraph 153 contains legal assertions that require no response and denies all remaining allegations.

154. Defendant states that Paragraph 154 contains legal assertions that require no response and denies all remaining allegations.

155. Defendant states that Paragraph 155 contains legal assertions that require no response and denies all remaining allegations.

156. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 156 and accordingly denies them.

157. Defendant states that the congressional map and the legislative debates prior to its adoption speak for themselves. Defendant denies any remaining allegations in Paragraph 157.

158. Defendant states that the congressional map and the legislative debates prior to its adoption speak for themselves. Defendant denies any remaining allegations in Paragraph 158.

159. Defendant states that the congressional map and the legislative debates prior to its adoption speak for themselves. Defendant denies any remaining allegations in Paragraph 159.

160. Defendant states that the congressional map and the legislative debates prior to its adoption speak for themselves. Defendant denies any remaining allegations in Paragraph 160.

161. Defendant states that the congressional map and the legislative debates prior to its adoption speak for themselves. Defendant denies any remaining allegations in Paragraph 161.

162. Defendant denies the allegations in Paragraph 162.

163. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 163 and accordingly denies them.

164. Defendant states that Paragraph 164 contains legal assertions that require no response and denies all remaining allegations.

165. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 165 and accordingly denies them.

166. Defendant states that Paragraph 166 contains legal assertions that require no response and denies all remaining allegations.

167. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 167 and accordingly denies them.

168. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 168 and accordingly denies them.

169. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 169 and accordingly denies them.

170. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 170 and accordingly denies them.

171. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 171 and accordingly denies them.

172. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 172 and accordingly denies them.

173. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 173 and accordingly denies them.

174. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 174 and accordingly denies them.

175. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 175 and accordingly denies them.

176. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 176 and accordingly denies them.

177. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 177 and accordingly denies them.

178. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 178 and accordingly denies them.

179. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 179 and accordingly denies them.

180. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 180 and accordingly denies them.

181. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 181 and accordingly denies them.

182. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 182 and accordingly denies them.

183. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 183 and accordingly denies them.

184. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 184 and accordingly denies them.

185. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 185 and accordingly denies them.

186. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 186 and accordingly denies them.

187. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 187 and accordingly denies them.

188. Defendant denies the allegations in Paragraph 188.

189. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 189 and accordingly denies them.

190. Defendant states that Paragraph 190 contains legal assertions that require no response and denies all remaining allegations.

191. Defendant states that Paragraph 191 contains legal assertions that require no response and denies all remaining allegations.

192. Defendant states that Paragraph 192 contains legal assertions that require no response and denies all remaining allegations.

193. Defendant states that Paragraph 193 contains legal assertions that require no response and denies all remaining allegations.

194. Defendant states that Paragraph 194 contains legal assertions that require no response and denies all remaining allegations.

195. Defendant states that Paragraph 195 contains legal assertions that require no response and denies all remaining allegations.

196. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 196 and accordingly denies them.

197. Defendant states that Paragraph 197 contains legal assertions that require no response and denies all remaining allegations.

198. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 198 and accordingly denies them.

199. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 199 and accordingly denies them.

200. Defendant states that the congressional map and the legislative debates prior to its adoption speak for themselves. Defendant denies any remaining allegations in Paragraph 200.

201. Defendant states that the congressional map and the legislative debates prior to its adoption speak for themselves. Defendant denies any remaining allegations in Paragraph 201.

202. Defendant states that the congressional map and the legislative debates prior to its adoption speak for themselves. Defendant denies any remaining allegations in Paragraph 202.

203. Defendant states that the congressional map and the legislative debates prior to its adoption speak for themselves. Defendant denies any remaining allegations in Paragraph 203.

204. Defendant states that the congressional map and the legislative debates prior to its adoption speak for themselves. Defendant denies any remaining allegations in Paragraph 204.

205. Defendant states that Paragraph 205 contains legal assertions that require no response and denies all remaining allegations.

206. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 206 and accordingly denies them.

207. Defendant states that Paragraph 207 contains legal assertions that require no response and denies all remaining allegations.

208. Defendant states that Paragraph 208 contains legal assertions that require no response and denies all remaining allegations.

209. Defendant states that Paragraph 209 contains legal assertions that require no response and denies all remaining allegations.

210. Defendant states that Paragraph 210 contains legal assertions that require no response and denies all remaining allegations.

211. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 211 and accordingly denies them.

212. Defendant states that Paragraph 212 contains legal assertions that require no response and denies all remaining allegations.

213. Defendant states that Paragraph 213 contains legal assertions that require no response and denies all remaining allegations.

214. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 214 and accordingly denies them.

215. Defendant states that Paragraph 215 contains legal assertions that require no response and denies all remaining allegations.

216. Defendant states that Paragraph 216 contains legal assertions that require no response and denies all remaining allegations.

217. Defendant states that Paragraph 217 contains legal assertions that require no response and denies all remaining allegations.

218. Defendant states that Paragraph 218 contains legal assertions that require no response and denies all remaining allegations.

219. Defendant states that Paragraph 219 contains legal assertions that require no response and denies all remaining allegations.

220. Defendant states that Paragraph 220 contains legal assertions that require no response and denies all remaining allegations.

221. Defendant states that Paragraph 221 contains legal assertions that require no response and denies all remaining allegations.

222. Defendant states that Paragraph 222 contains legal assertions that require no response and denies all remaining allegations.

223. Defendant states that Paragraph 223 contains legal assertions that require no response and denies all remaining allegations.

224. Defendant states that Paragraph 224 contains legal assertions that require no response and denies all remaining allegations.

225. Defendant states that Paragraph 225 contains legal assertions that require no response and denies all remaining allegations.

226. Defendant denies that Plaintiffs are entitled to any relief requested in pages 54-55 of the First Amended Complaint.

227. Defendant denies every allegation that is not specifically admitted in this answer to the Plaintiffs' First Amended Complaint.

AFFIRMATIVE DEFENSES

228. Defendant affirmatively asserts that the Plaintiffs failed to state a claim upon which relief can be granted.

229. Because Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in the First Amended Complaint, Defendant reserves the right to amend this answer and to assert other defenses he may have.

Dated: December 19, 2023

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