

IN THE CIRCUIT COURT FOR THE SECOND JUDICIAL CIRCUIT  
IN AND FOR LEON COUNTY, FLORIDA  
CIVIL DIVISION

**ELLEN FEDDER, et al., Plaintiffs,**

v.

Case No. 2006 CA 2996  
(consolidated with Case No.: 2006 CA 2973)

**FLORIDA ELECTIONS CANVASSING  
COMMISSION, et al, Defendants.**

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**ANSWER**

COMES NOW Tom Gallagher, Chief Financial Officer, State of Florida, Governor Jeb Bush, and State Senator Dan Webster, as members of and as the Florida Elections Canvassing Commission, and Sue Cobb as Secretary of State, State of Florida, pursuant to Fla. R. Civ. P. 1.110(c), and Fla. Stat. § 102.168, and files this Answer to the Ellen Fedder's Complaint challenging the certification of the Congressional District Thirteen election results in the 2006 general elections.

1. While the right to vote is fundamental, **DENY** that thousands of voters lost this right.
2. **ADMIT** that the Complaint is an action based on Fla. Stat. § 102.168; **DENY** as to the balance of the allegation.
3. **DENY.**
4. Without knowledge, therefore **DENY.**
5. **ADMIT.**
6. **ADMIT.**
7. **ADMIT.**
8. **ADMIT.**

9. **ADMIT** the mathematical computations; **DENY** any legal vote was rejected by the Sarasota County Canvassing Board.

10. **ADMIT** the mathematical computations; **DENY** that any legal vote was rejected by the Florida Elections Canvassing Commission.

11. **ADMIT.**

12. **ADMIT.**

13. **ADMIT.**

14. **ADMIT.**

15. **ADMIT.**

16. **ADMIT.**

17. **ADMIT.**

18. Without knowledge, therefore **DENY.**

19. Without knowledge, therefore **DENY.**

20. Without knowledge, therefore **DENY.**

21. **DENY**

22. **DENY.**

23. Without knowledge, therefore **DENY.**

24. Without knowledge, therefore **DENY.**

25. Without knowledge, therefore **DENY.**

26. Without knowledge, therefore **DENY.**

27. Without knowledge, therefore **DENY.**

28. **DENY.**

29. Without knowledge, therefore **DENY.**

30. **DENY.**

31. **ADMIT.**
32. **ADMIT.**
33. **DENY.**
34. **DENY.**
35. Without knowledge, therefore **DENY.**
36. **DENY.**
37. **DENY.**
38. **ADMIT.**
39. **ADMIT.**
40. **ADMIT.**
41. **DENY.**
42. **DENY.**
43. **DENY.**
44. **ADMIT.**
45. **DENY.**
46. **DENY.**
47. **ADMIT.**
48. **DENY.**

Respectfully submitted this 15 day of October, 2006.

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Facsimile or Electronic Transmission this 15<sup>th</sup> day of December, 2006, to the following:

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