

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

ROY COCKRUM, ET AL.,

Plaintiffs,

v.

DONALD J. TRUMP FOR PRESIDENT, INC.,

Defendant.

Case No. 3:18-cv-484-HEH

**DEFENDANT DONALD J. TRUMP FOR PRESIDENT, INC.'S
ANSWER TO PLAINTIFFS' AMENDED COMPLAINT**

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ANSWER

As required by paragraph B.1 of the Pretrial Schedule A attached to the Court's December 27, 2018 Order, Defendant Donald J. Trump for President, Inc. (Campaign) submits this answer to Plaintiffs' Amended Complaint. As provided in the Court's Order, the submission of this answer does not waive any available defenses or dispositive motions, including, but not limited to, the Campaign's previously submitted motion to dismiss Plaintiffs' Amended Complaint.

In accordance with Federal Rule of Civil Procedure 8(b)(3), the Campaign generally denies all allegations in the Amended Complaint, except for the allegations specifically admitted below. By way of further response, the Campaign states as follows.

ANSWER TO INTRODUCTION AND SUMMARY

1. The Campaign admits that Plaintiffs have brought this lawsuit. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 1, and on that basis denies the allegations.

2. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the second sentence of paragraph 2, and on that basis denies the allegation. The Campaign denies the remaining allegations in paragraph 2.

3. The Campaign denies the allegations in paragraph 3.

4. The Campaign denies the allegations in paragraph 4.

5. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 5, and on that basis denies the allegations.

6. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 6, and on that basis denies the allegations.

7. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 7, and on that basis denies the allegations.

8. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 8, and on that basis denies the allegations.

9. The Campaign admits the allegations in paragraph 9.

10. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 10, and on that basis denies the allegations.

11. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 11, and on that basis denies the allegations.

12. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 12, and on that basis denies the allegations.

13. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 13, and on that basis denies the allegations.

14. The Campaign denies the allegations in paragraph 14.

15. The Campaign denies the allegations of coordination, collusion, and conspiracy with Russian officials or their agents as set forth in the first four sentences of paragraph 15. The Campaign admits that on July 11, 2017, an email appeared on Donald Trump Jr.'s Twitter account, which speaks for itself, but denies the remaining allegations in the fifth sentence of paragraph 15. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 15, and on that basis denies the allegations.

16. The Campaign denies the allegations in paragraph 16.

17. The Campaign denies the allegations in paragraph 17.

18. The Campaign denies the allegations in the first two sentences of paragraph 18. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in the third sentence of paragraph 18, and on that basis denies the allegations.

19. The Campaign denies the allegations in paragraph 19.

20. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 20, and on that basis denies the allegations.

21. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 21, and on that basis denies the allegations.

22. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 22, and on that basis denies the allegations.

23. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 23, and on that basis denies the allegations.

24. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 24, and on that basis denies the allegations.

25. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 25, and on that basis denies the allegations.

26. Paragraph 26 states legal conclusions, to which no response is required. To the extent a response is required, the Campaign denies the allegations in paragraph 26.

27. Paragraph 27 states legal conclusions, to which no response is required. To the extent a response is required, the Campaign denies the allegations in paragraph 27.

28. The Campaign denies the first and second sentences of paragraph 28. The final sentence of paragraph 28 is vague and ambiguous, and on that basis the Campaign denies the

allegation. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 28, and on that basis denies the allegations.

29. The Campaign denies the allegations in the first sentence of paragraph 29. The fourth sentence of paragraph 29 mischaracterizes and takes out of context statements by Mr. Trump, and on that basis the Campaign denies the allegations. Mr. Trump's publicly available comments at the summit speak for themselves. The Campaign denies the remaining allegations of the fourth sentence of paragraph 29. The Campaign admits that on July 13, 2018, a grand jury in the District of Columbia indicted 12 individuals alleged to be Russian intelligence agents. That indictment speaks for itself; the Campaign denies any characterization at odds with its contents. The Campaign denies the remaining allegations of the fifth sentence of paragraph 29. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 29, and on that basis denies the allegations.

30. Paragraph 30 states legal conclusions, to which no response is required. To the extent a response is required, the Campaign denies the allegations in paragraph 30.

31. Paragraph 31 states legal conclusions, to which no response is required. To the extent a response is required, the Campaign denies the allegations in paragraph 31.

32. Paragraph 32 states legal conclusions, to which no response is required. To the extent a response is required, the Campaign denies the allegations in paragraph 32.

33. The Campaign admits that Plaintiffs have brought this lawsuit. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 33, and on that basis denies the allegations.

ANSWER TO JURISDICTIONAL ALLEGATIONS

34. Paragraph 34 states legal conclusions, to which no response is required. To the extent a response is required, the Campaign denies the allegations in paragraph 34.

35. Paragraph 35 states legal conclusions, to which no response is required. To the extent a response is required, the Campaign denies the allegations in paragraph 35.

36. Paragraph 36 states legal conclusions, to which no response is required. To the extent a response is required, the Campaign denies the allegations in paragraph 36.

37. The Campaign admits that it is incorporated in Virginia and maintains an agent registered in the Richmond division. The remaining allegations in paragraph 37 state legal conclusions, to which no response is required; to the extent a response is required, the Campaign denies the allegations.

ANSWER TO ALLEGATIONS ABOUT PARTIES

38. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 38, and on that basis denies the allegations.

39. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 39, and on that basis denies the allegations.

40. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 40, and on that basis denies the allegations.

41. The Campaign admits the allegations in paragraph 41.

42. The Campaign admits that a purpose of the Campaign was to elect Donald J. Trump to the presidency; that Carter Page and George Papadopoulos were not employed by the Campaign but rather were external unpaid volunteers who were identified in March of 2016 as foreign policy advisors to the Campaign; that Jefferson Sessions, then a U.S. Senator and later U.S. Attorney

General, was chair of the Campaign's national security advisory committee; that Jared Kushner, Mr. Trump's son-in-law, was an advisor to Mr. Trump during the campaign and is a senior advisor in the White House; and that Mr. Trump Jr. is Mr. Trump's son. Paragraph 42's statements that these individuals were all "agents" of the Trump Campaign, that Mr. Trump Jr. "acted and continues to act on behalf of the Campaign," and that Mr. Stone "acted as an agent of the Trump Campaign or as a co-conspirator" all state legal conclusions, to which no response is required; to the extent a response is required, the Campaign denies the allegations. The Campaign denies the remaining allegations in paragraph 42. Further, Paragraph 42's statements that certain individuals were "key" or "close" advisors or played "an important role" are vague and ambiguous, and on that basis the Campaign denies the allegations.

ANSWER TO FACTUAL ALLEGATIONS

43. Paragraph 43's statement that WikiLeaks published "private" information states a legal conclusion, to which no response is required; to the extent a response is required, the Campaign denies the allegation. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 43, and on that basis denies the allegations.

44. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 44, and on that basis denies the allegations.

45. Paragraph 45's statement that WikiLeaks published "private" information states a legal conclusion, to which no response is required; to the extent a response is required, the Campaign denies the allegation. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations of paragraph 45, and on that basis denies the allegations.

46. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 46, and on that basis denies the allegations.

47. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 47, and on that basis denies the allegations.

48. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 48, and on that basis denies the allegations.

49. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 49, and on that basis denies the allegations.

50. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 50, and on that basis denies the allegations.

51. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 51, and on that basis denies the allegations.

52. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 52, and on that basis denies the allegations.

53. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 53, and on that basis denies the allegations.

54. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 54, and on that basis denies the allegations.

55. Paragraph 55 states legal conclusions, to which no response is required. To the extent a response is required, the Campaign denies the allegations in paragraph 55.

56. Paragraph 56 states legal conclusions, to which no response is required. To the extent a response is required, the Campaign denies the allegations in paragraph 56.

57. Paragraph 57 states legal conclusions, to which no response is required. To the extent a response is required, the Campaign denies the allegations in paragraph 57.

58. Paragraph 58 states legal conclusions, to which no response is required. To the extent a response is required, the Campaign denies the allegations in paragraph 58.

59. Paragraph 59 states legal conclusions, to which no response is required. To the extent a response is required, the Campaign denies the allegations in paragraph 59.

60. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 60, and on that basis denies the allegations.

61. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 61, and on that basis denies the allegations.

62. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 62, and on that basis denies the allegations.

63. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 63, and on that basis denies the allegations.

64. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 64, and on that basis denies the allegations.

65. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 65, and on that basis denies the allegations.

66. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 66, and on that basis denies the allegations.

67. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 67, and on that basis denies the allegations.

68. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 68, and on that basis denies the allegations.

69. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 69, and on that basis denies the allegations.

70. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 70, and on that basis denies the allegations.

71. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 71, and on that basis denies the allegations.

72. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 72, and on that basis denies the allegations.

73. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 73, and on that basis denies the allegations.

74. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 74, and on that basis denies the allegations.

75. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 75, and on that basis denies the allegations.

76. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 76, and on that basis denies the allegations.

77. The Campaign denies that it caused any injuries to Plaintiffs. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 77, and on that basis denies the allegations.

78. The Campaign denies the allegations in paragraph 78.

79. The Campaign denies the allegations in paragraph 79.

80. The Campaign admits that U.S. government officials have opened a series of law enforcement and congressional investigations into allegations of Russian interference in the 2016 election, that Mr. Comey testified before the House Intelligence Committee on March 20, 2017, that Mr. Comey testified before the Senate Judiciary Committee on May 3, 2017, and that Mr. Comey was fired on May 9, 2017. Mr. Comey's testimony described in the second and third sentences in paragraph 80 speaks for itself; the Campaign denies any characterization of that testimony at odds with its contents, so no further response is required; to the extent a response is required to the allegations in the second and third sentences of paragraph 80, the Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations, and on that basis denies the allegations. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 80, and on that basis denies the allegations.

81. The Campaign admits the first two sentences of paragraph 81. The Campaign admits that the Special Counsel has indicted Mr. Manafort and Mr. Gates, and that Mr. Gates, Mr. Flynn, and Mr. Papadopoulos have pleaded guilty to charges brought by the Special Counsel. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations of paragraph 81, and on that basis denies the allegations.

82. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 82, and on that basis denies the allegations.

83. The Campaign admits that the U.S. intelligence community issued a report as described in paragraph 83. The report speaks for itself. Paragraph 83 takes quotations from the report out of context, and on that basis the Campaign denies the remaining allegations in paragraph 83.

84. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 84, and on that basis denies the allegations.

85. The Campaign admits that the Senate Select Committee on Intelligence issued a report in July 2018. The report speaks for itself; the Campaign denies any characterization of that report at odds with its contents, and on that basis the Campaign denies the remaining allegations of paragraph 85.

86. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 86, and on that basis denies the allegations.

87. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 87, and on that basis denies the allegations.

88. The Campaign admits that a grand jury indicted 12 individuals identified as GRU officers on July 13, 2018. The indictment speaks for itself; the Campaign denies any characterization of that indictment at odds with its contents. The Campaign denies that paragraph 88 accurately quotes or describes the indictment; contrary to the third second sentence of paragraph 88, the indictment does not allege that “the Trump Campaign was taking meetings with Russian agents to ‘get information on an opponent.’” Paragraph 88 also takes quotations from the indictment out of context, and on that basis the Campaign denies the remaining allegations in paragraph 88.

89. The Campaign denies the allegations in paragraph 89.

90. The Campaign denies the allegation of “suspicious interactions.” The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 90, and on that basis denies the allegations.

91. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 91, and on that basis denies the allegations.

92. The Campaign denies the allegations in paragraph 92.

93. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 93, and on that basis denies the allegations.

94. Responding to paragraph 94's allegations about internal campaign communications would involve disclosure of information that is privileged under the First Amendment, and on that basis no response is required. *See, e.g., Perry v. Schwarzenegger*, 591 F.3d 1147 (9th Cir. 2010). The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 94, and on that basis denies the allegations. In addition, the second and final sentences of paragraph 94 are vague and ambiguous, and on that basis the Campaign denies the allegations.

95. The Campaign admits that on March 31, 2016, Mr. Trump met with various individuals at the Trump International Hotel in Washington, D.C., including Mr. Papadopoulos, Mr. Sessions, and Mr. Gordon. Responding to paragraph 95's allegations about internal campaign communications would involve disclosure of information that is privileged under the First Amendment, and on that basis no response is required. *See, e.g., Perry v. Schwarzenegger*, 591 F.3d 1147 (9th Cir. 2010). The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 95, and on that basis denies the allegations.

96. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 96, and on that basis denies the allegations.

97. Responding to paragraph 97's allegations about internal campaign communications would involve disclosure of information that is privileged under the First Amendment, and on that basis no response is required. *See, e.g., Perry v. Schwarzenegger*, 591 F.3d 1147 (9th Cir. 2010). The Campaign lacks knowledge or information sufficient to form a belief about the truth of the

remaining allegations in paragraph 97, and on that basis denies the allegations. Further, the second sentence of paragraph 97 is vague and ambiguous, and on that basis the Campaign denies the allegation.

98. The Campaign admits that on April 27, 2016, Mr. Trump made public comments regarding foreign policy. The Campaign denies the remaining allegations in the first sentence of paragraph 98. In addition, the first sentence of paragraph 98 is vague and ambiguous, and on that basis the Campaign denies the allegation. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in the second sentence of paragraph 98, and on that basis denies the allegations. The Campaign denies the third sentence of paragraph 98. In addition, the third sentence of paragraph 98 is vague and ambiguous, and on that basis the Campaign denies the allegation.

99. Responding to paragraph 99's allegations about internal campaign communications would involve disclosure of information that is privileged under the First Amendment, and on that basis no response is required. *See, e.g., Perry v. Schwarzenegger*, 591 F.3d 1147 (9th Cir. 2010). The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 99, and on that basis denies the allegations.

100. The Campaign denies the allegations in paragraph 100.

101. The Campaign admits that on June 3, 2016, Mr. Trump Jr. sent an email including the language quoted in the final sentence of paragraph 101. The Campaign denies the characterization of Mr. Trump Jr.'s statement in the final sentence of paragraph 101. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 101, and on that basis denies the allegations.

102. The Campaign admits that emails referred to in paragraph 102 appeared on Mr. Trump Jr.'s Twitter account on July 11, 2017. Those emails speak for themselves, and the Campaign denies the allegations in paragraph 102 to the extent they are inconsistent with the emails. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 102, and on that basis denies the allegations.

103. Responding to paragraph 103's allegations about internal campaign communications would involve disclosure of information that is privileged under the First Amendment, and on that basis no response is required. *See, e.g., Perry v. Schwarzenegger*, 591 F.3d 1147 (9th Cir. 2010). The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 103, and on that basis denies the allegations.

104. The Campaign admits that on June 7, 2016, Mr. Trump gave a speech that included the statement quoted in paragraph 104. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 104, and on that basis denies the allegations.

105. The Campaign admits that on June 9, 2016, a tweet appeared on Mr. Trump's Twitter account that included the language quoted in paragraph 105. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 105, and on that basis denies the allegations.

106. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 106, and on that basis denies the allegations.

107. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 107, and on that basis denies the allegations.

108. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 108, and on that basis denies the allegations. In addition, the second sentence of paragraph 108 is vague and ambiguous, and on that basis the Campaign denies the allegation.

109. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the first sentence of paragraph 109, and on that basis denies the allegation. The Campaign denies the second sentence of paragraph 109.

110. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 110, and on that basis denies the allegations.

111. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 111, and on that basis denies the allegations.

112. The Campaign denies the allegations in paragraph 112.

113. The Campaign denies paragraph 113's allegation of a conspiracy. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 113, and on that basis denies the allegations.

114. The Campaign admits that Mr. Manafort communicated by email with Konstantin Kilimnik on April 11, 2016; the emails speak for themselves. The Campaign admits that Mr. Manafort was named Campaign Chairman and Chief Strategist in May 2016 and Campaign Manager in June 2016. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 114, and on that basis denies the allegations. In addition, the fourth sentence of paragraph 114 is vague and ambiguous, and on that basis the Campaign denies the allegation.

115. The Campaign admits that Mr. Manafort sent emails from his Campaign account to Mr. Kilimnik. The emails speak for themselves. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 115, and on that basis denies the allegations.

116. The Campaign admits that Mr. Manafort sent an email to Mr. Kilimnik on July 7, 2016. The email speaks for itself. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 116, and on that basis denies the allegations.

117. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 117, and on that basis denies the allegations.

118. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 118, and on that basis denies the allegations.

119. Responding to the allegations in Paragraph 119 about internal campaign communications would involve disclosure of information that is privileged under the First Amendment, and on that basis no response is required. *See, e.g., Perry v. Schwarzenegger*, 591 F.3d 1147 (9th Cir. 2010). The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 119, and on that basis denies the allegations.

120. Responding to paragraph 120's allegations about internal campaign communications would involve disclosure of information that is privileged under the First Amendment, and on that basis no response is required. *See, e.g., Perry v. Schwarzenegger*, 591 F.3d 1147 (9th Cir. 2010). The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 120, and on that basis denies the allegations.

121. The Campaign admits that the 2016 Republican National Convention took place between July 18, 2016 and July 21, 2016. Paragraph 121 statement that Plaintiffs' "private" data was published states a legal conclusion, to which no response is required; to the extent a response is required, the Campaign denies the allegation. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 121, and on that basis denies the allegations.

122. The Campaign denies the allegations in the first sentence of paragraph 122. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 122, and on that basis denies the allegations. Further, the Campaign denies the characterization of Peter Smith as having "links to the Trump Campaign." In addition, this characterization is vague and ambiguous, and on that basis the Campaign denies the allegation.

123. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 123, and on that basis denies the allegations.

124. The Campaign denies the allegations in the last two sentences of paragraph 124. Further, the Campaign denies the characterization of Peter Smith as being "closely connected to the Trump Campaign and its agents" and "well connected within the top echelons of the campaign." In addition, this characterization is vague and ambiguous, and on that basis the Campaign denies the allegation. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 124, and on that basis denies the allegations.

125. The Campaign denies the first sentence of paragraph 125. The Campaign admits that on August 21, 2018, Michael Cohen, who has been Mr. Trump's attorney, pleaded guilty to an eight-count Bill of Information. The Bill of Information described in the remainder of paragraph

125 speaks for itself, so no further response is required; to the extent a response is required, the Campaign denies the allegations.

126. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 126, and on that basis denies the allegations.

127. The Campaign denies the allegations in paragraph 127.

128. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 128, and on that basis denies the allegations. In addition, paragraph 128 is vague and ambiguous, and on that basis the Campaign denies the allegations.

129. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 129, and on that basis denies the allegations.

130. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 130, and on that basis denies the allegations. In addition, the first sentence of paragraph 130 is vague and ambiguous, and on that basis the Campaign denies the allegation.

131. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 131, and on that basis denies the allegations. In addition, paragraph 131 is vague and ambiguous, and on that basis the Campaign denies the allegation.

132. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 132, and on that basis denies the allegations.

133. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 133, and on that basis denies the allegations.

134. The Campaign admits that Mr. Trump appeared on Hugh Hewitt's radio program on September 21, 2015. Remarks made by Mr. Trump during that interview speak for themselves.

In addition, paragraph 134 takes quotations from the interview out of context, and on that basis the Campaign denies the remaining allegations.

135. The Campaign admits that Mr. Trump participated in a Republican primary debate on November 10, 2015. Remarks made by Mr. Trump during that debate speak for themselves. In addition, paragraph 135 takes quotations from the debate out of context, and on that basis the Campaign denies the allegations.

136. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 136, and on that basis denies the allegations.

137. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 137, and on that basis denies the allegations.

138. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 138, and on that basis denies the allegations. In addition, paragraph 138 is vague and ambiguous, and on that basis the Campaign denies the allegations.

139. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 139, and on that basis denies the allegations.

140. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 140, and on that basis denies the allegations.

141. The Campaign admits the first sentence of paragraph 141. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 141, and on that basis denies the allegations.

142. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 142, and on that basis denies the allegations.

143. The Campaign admits that Michael Flynn was not an employee of the Campaign but rather was a surrogate for Mr. Trump and advised Mr. Trump on issues of foreign policy and national security during the campaign. The Campaign further admits that after the 2016 election, Mr. Flynn served as National Security Advisor. Responding to the allegation that Mr. Flynn was considered as a possible running mate for Mr. Trump would involve disclosure of information that is privileged under the First Amendment, and on that basis no response is required. *See, e.g., Perry v. Schwarzenegger*, 591 F.3d 1147 (9th Cir. 2010). The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 143, and on that basis denies the allegations.

144. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 144, and on that basis denies the allegations. Further, Paragraph 144 is vague and ambiguous, and on that basis the Campaign denies the allegations.

145. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 145, and on that basis denies the allegations.

146. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 146, and on that basis denies the allegations.

147. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 147, and on that basis denies the allegations.

148. The Campaign denies the allegation of coordination. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 148, and on that basis denies the allegations.

149. The Campaign denies any allegation of conspiracy, coordination, or collusion in paragraph 149. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 149, and on that basis denies the allegations.

150. The Campaign denies the allegations in paragraph 150.

151. The Campaign denies the allegations in paragraph 151.

152. The Campaign admits that it did not pay Mr. Manafort for his work on the Campaign. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 152, and on that basis denies the allegations.

153. The Campaign denies the allegations in paragraph 153.

154. The Campaign denies the allegations in paragraph 154.

155. The Campaign denies the allegations in paragraph 155.

156. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 156, and on that basis denies the allegations. Further, paragraph 156 is vague and ambiguous, and on that basis the Campaign denies the allegation.

157. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 157, and on that basis denies the allegations. Further, paragraph 157 is vague and ambiguous, and on that basis the Campaign denies the allegation.

158. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 158, and on that basis denies the allegations.

159. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 159, and on that basis denies the allegations.

160. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 160, and on that basis denies the allegations.

161. The Campaign denies the allegations in paragraph 161. In addition, paragraph 161 is vague and ambiguous, and on that basis the Campaign denies the allegations.

162. Responding to paragraph 162's allegations about internal campaign and party communications would involve disclosure of information that is privileged under the First Amendment, and on that basis no response is required. *See, e.g., Perry v. Schwarzenegger*, 591 F.3d 1147 (9th Cir. 2010). The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 162. Further, paragraph 162 is vague and ambiguous, and on that basis the Campaign denies the allegations.

163. Responding to paragraph 163's allegations about internal campaign and party communications would involve disclosure of information that is privileged under the First Amendment, and on that basis no response is required. *See, e.g., Perry v. Schwarzenegger*, 591 F.3d 1147 (9th Cir. 2010). The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 163, and on that basis denies the allegations. In addition, the final sentence of paragraph 163 is vague and ambiguous, and on that basis the Campaign denies the allegation.

164. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 164. In addition, the second sentence of paragraph 164 is vague and ambiguous, and on that basis the Campaign denies the allegations.

165. The Campaign admits that Mr. Trump did not specifically mention Russia during his acceptance speech at the convention. The remaining allegations in paragraph 165 are vague and ambiguous, and on that basis the Campaign denies them.

166. The Campaign denies the first three sentences of paragraph 166. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations of paragraph 166, and on that basis denies the allegations.

167. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 167. In addition, paragraph 167 is vague and ambiguous, and on that basis the Campaign denies the allegations.

168. The Campaign admits the allegations in the first two sentences of paragraph 168. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 168, and on that basis denies the allegations.

169. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 169. In addition, paragraph 169 is vague and ambiguous, and on that basis the Campaign denies the allegations.

170. The Campaign denies the allegations in the second sentence of paragraph 170. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations of paragraph 170, and on that basis denies the allegations.

171. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 171, and on that basis denies the allegations.

172. The Campaign denies that it has engaged in a “public relations campaign” as alleged in paragraph 172. The Campaign lacks information sufficient to form a belief about the remaining allegations in paragraph 172, and on that basis denies the allegations.

173. The Campaign denies the first sentence of paragraph 173. The Campaign lacks information sufficient to form a belief about the remaining allegations in paragraph 173, and on that basis denies the allegations.

174. The Campaign denies the allegations in paragraph 174.

175. The Campaign admits that emails appeared on the WikiLeaks website on July 22, 2016. The third sentence of paragraph 175 states a legal conclusion, to which no response is required; to the extent a response is required, the Campaign denies the allegation. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 175, and on that basis denies the allegations.

176. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 176, and on that basis denies the allegations.

177. The Campaign denies the allegations in paragraph 177.

178. The Campaign denies the allegations in paragraph 178.

179. The Campaign denies the allegations in paragraph 179.

180. The Campaign denies the allegations in paragraph 180.

181. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in the first sentence of paragraph 181, and on that basis denies the allegations. The indictment discussed in the final sentence of paragraph 181 speaks for itself; the Campaign denies any characterization of that indictment at odds with its contents. Further, the third sentence of paragraph 181 is vague and ambiguous, and on that basis the Campaign denies the allegation. The Campaign denies the remaining allegations in paragraph 181.

182. The Campaign denies paragraph 182's allegation of a conspiracy. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 182, and on that basis denies the allegations.

183. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 183, and on that basis denies the allegations.

184. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 184, and on that basis denies the allegations.

185. The Campaign admits that The New York Times published an article around the time of the 2016 Democratic National Convention that stated: “the publication of 20,000 Democratic National Committee emails by WikiLeaks this weekend provided a disastrous prelude to the convention.” The Campaign admits that the National Review published an article around the time of the 2016 Democratic National Convention that stated: “WikiLeaks blows up the party’s hopes for a smooth convention week.” The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 185, and on that basis denies the allegations.

186. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 186, and on that basis denies the allegations. In addition, paragraph 186 is vague and ambiguous, and on that basis the Campaign denies it.

187. Responding to paragraph 187’s allegations about internal campaign communications would involve disclosure of information that is privileged under the First Amendment, and on that basis no response is required. *See, e.g., Perry v. Schwarzenegger*, 591 F.3d 1147 (9th Cir. 2010). The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 187, and on that basis denies the allegations. Further, the first and third sentences of paragraph 187 are vague and ambiguous, and on that basis the Campaign denies them.

188. The Campaign admits that a tweet appeared on Mr. Trump’s Twitter account on July 23, 2016 stating: “The Wikileaks e-mail release today was so bad to Sanders that it will make it impossible for him to support her, unless he is a fraud!” The Campaign lacks knowledge or

information sufficient to form a belief about the truth of the remaining allegations in paragraph 188, and on that basis denies the allegations. Further, the remaining allegations of paragraph 188 mischaracterize and take out of context a tweet on Mr. Trump's Twitter account, and on that basis the Campaign denies the remaining allegations.

189. The Campaign admits that Mr. Trump appeared on *Good Morning America* on October 27, 2016. Mr. Trump's remarks during that appearance speak for themselves. The remainder of paragraph 189 takes a statement by Mr. Trump out of context, and on that basis the Campaign denies the remaining allegations.

190. The Campaign denies the allegations in paragraph 190.

191. The Campaign admits that Mr. Trump held a press conference in Florida on July 27, 2016. Mr. Trump's remarks during that press conference speak for themselves. Further, paragraph 191 takes quoted statements by Mr. Trump out of context, and on that basis the Campaign denies the allegations. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 191.

192. The Campaign admits that on July 13, 2018, a grand jury in the District of Columbia indicted 12 individuals identified as Russian nationals. That indictment speaks for itself; the Campaign denies any characterization at odds with its contents. The Campaign denies the characterization of Mr. Trump's statements in paragraph 192. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 192, and on that basis denies the allegations.

193. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 193, and on that basis denies the allegations.

194. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 194, and on that basis denies the allegations.

195. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 195, and on that basis denies the allegations.

196. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 196, and on that basis denies the allegations.

197. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 197, and on that basis denies the allegations.

198. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 198, and on that basis denies the allegations.

199. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 199, and on that basis denies the allegations.

200. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 200, and on that basis denies the allegations.

201. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 201, and on that basis denies the allegations.

202. The Campaign admits that a batch of emails appeared on the WikiLeaks website on October 7, 2016. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 202, and on that basis denies the allegations.

203. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 203, and on that basis denies the allegations. In addition, paragraph 203 is vague and ambiguous, and on that basis the Campaign denies the allegations. In addition,

204. The Campaign admits that Mr. Trump gave a speech on November 2, 2016. The speech speaks for itself, and the Campaign denies any allegations in paragraph 204 to the extent they are inconsistent with its contents. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 204, and on that basis denies the allegations. Further, the first sentence of paragraph 204 is vague and ambiguous, and on that basis the Campaign denies the allegations.

205. The Campaign denies that it engaged in the activity described in paragraph 205. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 205, and on that basis denies the allegations. Further, paragraph 205 is vague and ambiguous, and on that basis the Campaign denies the allegations.

206. The Campaign denies the allegation in Paragraph 206 that Cambridge Analytica “ran the Campaign’s digital operations.” Paragraph 206 states a legal conclusion that Cambridge Analytica was an agent of the Campaign, to which no response is required; to the extent a response is required, the Campaign denies the allegations. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 206, and on that basis denies the allegations.

207. Responding to paragraph 207’s allegations about internal campaign communications would involve disclosing information that is privileged under the First Amendment, and on that basis no response is required. *See, e.g., Perry v. Schwarzenegger*, 591 F.3d 1147 (9th Cir. 2010). The Campaign admits that, on November 13, 2017, a chain of direct messages with the Twitter handle “@wikileaks” was posted on Mr. Trump Jr.’s Twitter account. The tweets speak for themselves. The Campaign admits that tweets referring to WikiLeaks have appeared on Mr. Trump Sr.’s Twitter account. The tweets speak for themselves. The Campaign lacks knowledge or

information sufficient to form a belief about the truth of the remaining allegations in paragraph 207, and on that basis denies the allegations.

208. The Campaign denies the allegations in paragraph 208.

209. The Campaign denies the allegations in paragraph 209.

210. The Campaign denies the allegations in paragraph 210.

211. The Campaign denies the allegations in paragraph 211.

212. The Campaign admits that Mr. Trump Jr. appeared on CNN on July 24, 2016. Mr. Trump Jr.'s remarks during that appearance speak for themselves. The first sentence of Paragraph 212 mischaracterizes and takes out of context statements by Mr. Trump Jr., and on that basis the Campaign denies the allegations. The Campaign denies the remaining allegations in the first sentence of paragraph 212. The Campaign admits that on July 10, 2017, a tweet appeared on Mr. Trump Jr.'s Twitter account that included, in part, the quoted language in the sixth sentence of paragraph 212. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 212, and on that basis denies the allegations.

213. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 213, and on that basis denies the allegations.

214. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 214, and on that basis denies the allegations.

215. No response is required to the first six sentences of paragraph 215 because those sentences state legal conclusions and because the quoted statutory provisions speak for themselves. To the extent a response to the first six sentences is required, the Campaign denies the allegations in those sentences. The Campaign denies the allegations in the seventh sentence of paragraph 215.

The seventh sentence of paragraph 215 also states a legal conclusion to which no response is required; to the extent a response is required, the Campaign denies the allegations. The eighth sentence of paragraph 215 states a legal conclusion to which no response is required; to the extent a response is required, the Campaign denies the allegations. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations of the ninth sentence in paragraph 215, and on that basis denies the allegations. In addition, the ninth sentence of paragraph 215 is vague and ambiguous, and on that basis the Campaign denies the allegations. The Campaign admits that the Special Counsel has indicted persons identified as Russians and Russia-based entities. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations of the tenth sentence in paragraph 215, and on that basis denies the allegations. The eleventh sentence of paragraph 215 states a legal conclusion to which no response is required; to the extent a response is required, the Campaign denies the allegations. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 215, and on that basis denies the allegations.

216. The Campaign denies the allegations in paragraph 216.

217. The Campaign denies paragraph 217's characterization of the statement it describes as an "example" of the conduct alleged in paragraph 216. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 217, and on that basis denies the allegations.

218. The Campaign admits the allegations in paragraph 218, but denies the allegation that the statement it describes is an example of the conduct alleged in paragraph 216.

219. The Campaign admits the allegations in paragraph 219, but denies the allegation that the statement it describes is an example of the conduct alleged in paragraph 216.

220. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 220, and on that basis denies the allegations.

221. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 221, and on that basis denies the allegations.

222. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 222, and on that basis denies the allegations.

223. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 223, and on that basis denies the allegations.

224. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 224, and on that basis denies the allegations.

225. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 225, and on that basis denies the allegations.

226. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 226, and on that basis denies the allegations. Further, the first sentence of paragraph 226 is vague and ambiguous, and on that basis the Campaign denies it. In addition, the Campaign denies the allegation of dishonesty in the second sentence of paragraph 226.

227. The Campaign denies the allegations in paragraph 227.

228. Paragraph 228's allegations about the disclosures that are "required by law" state a legal conclusion, to which no response is required; to the extent a response is required, the Campaign denies the allegation. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 228, and on that basis denies the allegations.

229. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 229, and on that basis denies the allegations.

230. Paragraph 230's allegations about the disclosures that are "required by law" state a legal conclusion, to which no response is required; to the extent a response is required, the Campaign denies the allegation. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 230, and on that basis denies the allegations.

231. Paragraph 231's allegations about whether certain acts amount to a federal crime state a legal conclusion, to which no response is required; to the extent a response is required, the Campaign denies the allegation. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 231, and on that basis denies the allegations.

232. The Campaign denies the allegations in the first and second sentences of paragraph 232. In addition, the second sentence of paragraph 232 is vague and ambiguous, and on that basis the Campaign denies the allegation. The Campaign admits that Mr. Trump made a statement on July 27, 2016. The statement speaks for itself, and denies the allegation in the third sentence of paragraph 232 to the extent it is inconsistent with the statement. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 232, and on that basis denies the allegations.

233. The Campaign admits that Mr. Trump spoke at a campaign rally in Florida on October 24, 2016. Mr. Trump's remarks at the rally speak for themselves. In addition, paragraph 233 takes a quotation from Mr. Trump out of context, and on that basis the Campaign denies the remaining allegations.

234. The Campaign admits that Mr. Trump spoke at a campaign rally in Kinston, North Carolina on October 26, 2016. Mr. Trump's remarks at the rally speak for themselves. In addition, paragraph 234 takes a quotation from Mr. Trump out of context, and on that basis the Campaign denies the remaining allegations.

235. The Campaign admits that a tweet appeared on Mr. Trump's Twitter account on January 11, 2017 that included the quoted language in paragraph 235. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 235, and on that basis denies the allegations.

236. The Campaign admits that a tweet appeared on Mr. Trump's Twitter account on February 7, 2017 that included the quoted language in paragraph 236. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 236, and on that basis denies the allegations. Further, paragraph 236 takes a quotation attributed to Mr. Trump out of context, and on that basis the Campaign denies the remaining allegations.

237. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 237, and on that basis denies the allegations.

238. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 238, and on that basis denies the allegations. In addition, paragraph 238 is vague and ambiguous, and on that basis the Campaign denies it.

239. The Campaign denies the allegations in paragraph 239.

240. The Campaign admits that on June 15, 2016, Mr. Trump made a public statement regarding the hacking of the DNC. That statement speaks for itself. In addition, paragraph 240

mischaracterizes and takes out of context a statement by Mr. Trump, and on that basis the Campaign denies the allegations.

241. The Campaign admits that a tweet appeared on Mr. Trump's Twitter account on July 26, 2016 that included the language quoted in paragraph 241. In addition, paragraph 241 takes a quotation from Mr. Trump out of context, and on that basis the Campaign denies the remaining allegations. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 241, and on that basis denies the allegations.

242. The Campaign admits that Mr. Trump participated in an interview that aired on RT on September 8, 2016. Mr. Trump's remarks speak for themselves. In addition, paragraph 242 takes quotations from Mr. Trump out of context, and on that basis the Campaign denies the remaining allegations concerning his remarks. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 242, and on that basis denies the allegations.

243. The Campaign admits that Mr. Trump participated in a presidential debate on September 26, 2016. Mr. Trump's remarks speak for themselves. In addition, paragraph 243 takes a quotation from Mr. Trump out of context, and on that basis the Campaign denies the remaining allegations.

244. The Campaign admits that Mr. Trump participated in a presidential debate on October 9, 2016. Mr. Trump's remarks speak for themselves. In addition, paragraph 244 takes a quotation from Mr. Trump out of context, and on that basis the Campaign denies the remaining allegations.

245. The Campaign admits that Mr. Trump participated in an interview with Time magazine on November 28, 2016. Mr. Trump's remarks speak for themselves. In addition, paragraph

245 takes a quotation from Mr. Trump out of context, and on that basis the Campaign denies the remaining allegations.

246. The Campaign admits that Mr. Trump made remarks to reporters on July 6, 2017 while traveling in Poland. Mr. Trump's remarks speak for themselves. In addition, paragraph 246 takes a quotation from Mr. Trump out of context, and on that basis the Campaign denies the remaining allegations in the first sentence of paragraph 246. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 246, and on that basis denies the allegations.

247. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 247, and on that basis denies the allegations.

248. The Campaign denies the allegations in the first and second sentences of paragraph 248. The Campaign admits that Mr. Trump made remarks on July 16, 2018 at the Helsinki summit. Mr. Trump's remarks speak for themselves. The Campaign denies the remaining allegations in the fourth sentence of paragraph 248. In addition, the third and fourth sentences of paragraph 248 take quotations from Mr. Trump out of context, and on that basis the Campaign denies the remaining allegations in the third and fourth sentences of paragraph 248.

249. Paragraph 249's characterization of Mr. Stone as an agent of the Campaign states a legal conclusion, to which no response is required; to the extent a response is required, the Campaign denies the allegation. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 249, and on that basis denies the allegations.

250. The Campaign denies the allegations in the first two sentences of paragraph 250. In addition, the second and fourth sentences of paragraph 250 are vague and ambiguous, and on that

basis the Campaign denies the allegations. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in the third and fourth sentences of paragraph 250, and on that basis denies the allegations. Responding to the allegations about internal campaign and party communications in the last sentence of paragraph 250 would involve disclosure of information that is privileged under the First Amendment, and on that basis no response is required. *See, e.g., Perry v. Schwarzenegger*, 591 F.3d 1147 (9th Cir. 2010).

251. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 251, and on that basis denies the allegations.

252. The Campaign admits the first sentence of paragraph 252. The Campaign lacks information sufficient to form a belief about the truth of the remaining allegations in paragraph 252, and on that basis denies the allegations.

253. The Campaign lacks information sufficient to form a belief about the truth of the allegations in paragraph 253, and on that basis denies them.

254. The Campaign denies the allegations in paragraph 254.

255. The Campaign denies the allegations in paragraph 255.

256. The Campaign denies the allegations in paragraph 256.

ANSWER TO COUNT I

257. The Campaign incorporates the preceding paragraphs of the answer by reference.

258. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 258, and on that basis denies the allegations.

259. The Campaign lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 259, and on that basis denies the allegations.

260. The Campaign denies the allegations in paragraph 260.

261. The Campaign denies the allegations in paragraph 261.

262. The Campaign denies the allegations in paragraph 262.

263. The Campaign denies the allegations in paragraph 263.

264. The Campaign denies the allegations in paragraph 264.

265. The Campaign denies the allegations in paragraph 265.

266. The Campaign denies the allegations in paragraph 266.

267. The Campaign denies the allegations in paragraph 267.

268. Paragraph 268 states a legal conclusion, to which no response is required; to the extent a response is required, the Campaign denies the allegations.

269. Paragraph 269 states a legal conclusion, to which no response is required; to the extent a response is required, the Campaign denies the allegations.

270. Paragraph 270 states a legal conclusion, to which no response is required; to the extent a response is required, the Campaign denies the allegations.

ANSWER TO COUNT II

271. The Campaign incorporates the preceding answer paragraphs by reference.

272. The Campaign denies the allegations in paragraph 272.

273. The Campaign denies the allegations in paragraph 273.

274. The Campaign denies the allegations in paragraph 274.

275. The Campaign denies the allegations in paragraph 275.

276. The Campaign denies the allegations in paragraph 276.

277. Paragraph 277 states a legal conclusion, to which no response is required; to the extent a response is required, the Campaign denies the allegations.

278. Paragraph 278 states a legal conclusion, to which no response is required; to the extent a response is required, the Campaign denies the allegations.

ANSWER TO COUNT III

279. The Campaign incorporates the preceding paragraphs of the answer by reference.

280. The Campaign denies the allegations in paragraph 280.

281. The Campaign denies the allegations in paragraph 281.

282. The Campaign denies the allegations in paragraph 282.

283. The Campaign denies the allegations in paragraph 283.

284. The Campaign denies the allegations of paragraph 284.

285. Paragraph 285 states a legal conclusion, to which no response is required; to the extent a response is required, the Campaign denies the allegations.

286. Paragraph 286 states a legal conclusion, to which no response is required; to the extent a response is required, the Campaign denies the allegations.

ANSWER TO COUNT IV

287. The Campaign incorporates the preceding paragraphs of the answer by reference.

288. The Campaign denies the allegations in paragraph 288.

289. The Campaign denies the allegations in paragraph 289.

290. The Campaign denies the allegations in paragraph 290.

291. The Campaign denies the allegations in paragraph 291.

292. The Campaign denies the allegations in paragraph 292.

293. Paragraph 293 states a legal conclusion, to which no response is required; to the extent a response is required, the Campaign denies the allegation.

294. Paragraph 294 states a legal conclusion, to which no response is required; to the extent a response is required, the Campaign denies the allegation.

ANSWER TO COUNT V

295. The Campaign incorporates the preceding paragraphs of the answer by reference.

296. The Campaign denies the allegations in paragraph 296.

297. The Campaign denies the allegations in paragraph 297.

298. The Campaign denies the allegations in paragraph 298.

299. The Campaign denies the allegations in paragraph 299.

300. The Campaign denies the allegations in paragraph 300.

301. The Campaign denies the allegations in paragraph 301.

302. Paragraph 302 states a legal conclusion, to which no response is required; to the extent a response is required, the Campaign denies the allegation.

303. Paragraph 303 states a legal conclusion, to which no response is required; to the extent a response is required, the Campaign denies the allegation.

ANSWER TO COUNT VI

304. The Campaign incorporates the preceding paragraphs of the answer by reference.

305. The Campaign denies the allegations in the first and second sentences of paragraph 305. The third sentence of paragraph 305 states a legal conclusion, to which no response is required; to the extent a response is required, the Campaign denies the allegation.

306. Paragraph 306 states legal conclusions, to which no response is required. To the extent a response is required, the Campaign denies the allegations.

307. The Campaign denies the allegations in paragraph 307.

308. Paragraph 308 states a legal conclusion, to which no response is required; to the extent a response is required, the Campaign denies the allegation.

ANSWER TO PRAYER FOR RELIEF

a) The Campaign denies the allegations in paragraph a) of the prayer for relief, and denies that Plaintiffs are denied to any relief.

b) The Campaign denies the allegations in paragraph b) of the prayer for relief, and denies that Plaintiffs are denied to any relief.

c) The Campaign denies the allegations in paragraph c) of the prayer for relief, and denies that Plaintiffs are denied to any relief.

d) The Campaign denies the allegations in paragraph d) of the prayer for relief, and denies that Plaintiffs are denied to any relief.

e) The Campaign denies the allegations in paragraph e) of the prayer for relief, and denies that Plaintiffs are denied to any relief.

f) The Campaign denies the allegations in paragraph f) of the prayer for relief, and denies that Plaintiffs are denied to any relief.

AFFIRMATIVE AND OTHER DEFENSES

The Campaign asserts the following affirmative and other defenses. The Campaign undertakes the burden of proof only as to those defenses deemed affirmative defenses by law, regardless of how such defenses are denominated in this answer. Further, the Campaign reserves the right to assert any and all defenses on which the Campaign does not bear the burden of proof.

A. Plaintiffs' claims are barred by the Free Speech and Free Press Clauses of the United States Constitution and applicable state constitutions.

- B. Plaintiffs' claims are barred by the Due Process Clauses of the United States Constitution and applicable state constitutions.
- C. Plaintiffs' claims are barred by applicable anti-SLAPP statutes.
- D. Plaintiffs' claims are barred by section 230 of the Communications Decency Act.
- E. Plaintiffs' claims are barred by applicable choice-of-law rules.
- F. Plaintiffs' claims are contrary to public policy.
- G. Plaintiffs' claims are barred by the doctrine of foreign affairs preemption and the Constitution's vesting of foreign-affairs powers in the Federal Government.
- H. Plaintiffs' claims are preempted by the Federal Election Campaign Act.
- I. Plaintiffs' claims are barred by applicable statutes of limitations.
- J. Plaintiffs' claims are barred by laches.
- K. Section 1985(3), as construed by Plaintiffs, exceeds Congress' enumerated powers under the United States Constitution.
- L. Nonparties to this case are at fault for Plaintiffs' alleged injuries.
- M. Plaintiffs' claims may be barred by the doctrines of assumption of risk and *volenti non fit injuria*.
- N. Plaintiffs' claims may be barred by estoppel and waiver.
- O. Plaintiffs' claims may be barred by the doctrine of unclean hands.
- P. Plaintiffs have failed to state a claim.
- Q. Plaintiffs are not entitled to the relief they seek.

JURY DEMAND

In accordance with Federal Rule of Civil Procedure 38, the Campaign demands a jury trial on all issues so triable.

CONCLUSION

The Campaign respectfully requests that the Court dismiss Plaintiffs' claims, enter final judgment in the Campaign's favor, award the Campaign costs, expenses, and reasonable attorneys' fees, and grant such other relief to the Campaign as the Court may deem just and proper.

Dated: January 7, 2019

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on January 7, 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to all registered parties.

Dated: January 7, 2019

/s/ Nikki L. McArthur

Nikki L. McArthur

Counsel for Donald J. Trump for President, Inc.

General Information

Court	United States District Court for the Eastern District of Virginia; United States District Court for the Eastern District of Virginia
Federal Nature of Suit	Civil Rights - Other[440]
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