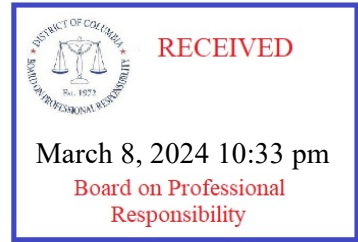


**Before The  
DISTRICT OF COLUMBIA COURT OF APPEALS  
BOARD ON PROFESSIONAL RESPONSIBILITY**



**In Re:**

**JULIA Z. HALLER,**

**A Member of the Bar of the  
District of Columbia Court of  
Appeals  
(Bar No. 466921)**

**Respondent.**

**Disciplinary Docket Nos.  
2021-D012, 2021-D013,  
2021-D014, 2021-D015,  
2021-D044, and 2021-D046**

**In Re:**

**BRANDON C. JOHNSON,  
A Member of the Bar of the  
District of Columbia Court of  
Appeals  
(Bar Number: 491370)**

**Respondent.**

**Disciplinary Docket Nos.  
2021-D012, 2021-D013,  
2021-D014, 2021-D015,  
2021-D044, and 2021-D046**

**ANSWER OF RESPONDENT JULIA Z. HALLER**

Respondent, Julia Z. Haller (“Respondent” or “Respondent Haller”),  
by counsel, and pursuant to District of Columbia Court of Appeals, Board  
Rule 7.5 answers the Specification of Charges as follows:

## INTRODUCTION

Respondent has been practicing law for over 25 years primarily as a civil litigator. She graduated from law school in 1996 and initially worked as a judicial law clerk in the Superior Court of New Jersey in 1997. Respondent interned and was trained by the United States Attorney's Office for the District of New Jersey in 1995.

Respondent moved to the District of Columbia and was admitted to practice in the Court of Appeals in 2000. Respondent has also served in government but remained primarily in private practice. To date, no former or current client has filed a bar complaint against Respondent in any jurisdiction in which she is admitted to practice.

## FIRST DEFENSE

Respondent did not commit the wrongs alleged in the Specification of Charges.

## SECOND DEFENSE

The Specification of Charges seeks to discipline an attorney for actions protected by the U.S. Constitution, including the rights of free speech and the right to petition the government for redress.

### THIRD DEFENSE

The Specification of Charges seeks to discipline an attorney based on viewpoint discrimination.

### FOURTH DEFENSE

Respondent answers the numbered paragraphs of the Specification of Charges as follows:

#### **Jurisdiction**

1. Respondent admits the allegations of Paragraph 1.
2. On information and belief, Respondent admits the allegations of Paragraph 2.
3. Respondent Haller denies the allegations of Paragraph 3 and avers that this Paragraph contains multiple incorrect and misleading allegations. For example, Respondent did not file the federal lawsuits against state election offices and state government officials in any of the subject four states (Michigan, Georgia, Wisconsin, and Arizona). Respondent's name and bar number were merely included on the initial pleadings under the heading of "*Of Counsel.*" On information and belief, Respondent avers that each subject Complaint was filed by a local counsel who was not retained or controlled by Respondent Haller. She also did not sign any of the filed Complaints. Respondent Haller denies filing any appearance or practicing in

Michigan or Wisconsin court on behalf of Plaintiffs. *See* E. D. Mich. LR 83.20(a)(1) (defining “practice in this court” to include: “appear in, commence, conduct, prosecute, or defend the action or proceeding; appear in open court; sign a paper; participate in a pretrial conference; represent a client at a deposition; or otherwise practice in this court or before an officer of this court”).<sup>1</sup>

In addition, the allegations that the lawsuits sought to “overturn the election” ignores review of the Complaint by the U.S. Court of Appeals for the Sixth Circuit, which reversed the U.S. District Court for the Eastern District of Michigan, in part, and affirmed in part, holding:

The defendants argue that even the complaint’s nonfrivolous claims were sanctionable because the complaint’s requests for relief were frivolous. But parties can tailor those requests as the case proceeds, and the complaint here included a request for any “relief as is just and proper.” Compl. ¶233. That means counsel could have filed this lawsuit without any of the requests for relief that defendants say were frivolous. Those requests alone therefore do not render the nonfrivolous legal claims sanctionable. Nor did the district court identify any

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<sup>1</sup> The term “*Of Counsel*” is a term with multiple meanings. Here, it was used to reflect Respondent’s assistance in preparing portions of the document. For example, one definition of the term “of counsel” provides: “[a] term commonly applied in the Practice of Law to an attorney who has been employed to aid in the preparation and management of a particular case but who is not the principal attorney in the action.” *See* The Free Dictionary by Farlex, <https://legal-dictionary.thefreedictionary.com/Of+Counsel>.

other ground to support a determination that the entirety of this complaint was frivolous.

*King v. Whitmer*, 71 F.4th 511, 529 (6th Cir. 2023), *cert. denied sub nom. Powell v. Whitmer*, No. 23-486, 2024 WL 674733 (U.S. Feb. 20, 2024), and *cert. denied sub nom. Wood v. Whitmer*, No. 23-497, 2024 WL 674735 (U.S. Feb. 20, 2024).

On information and belief, Respondent Haller notes that each of the four states did not certify the 2020 presidential election until at least November 20, 2020: Georgia’s Secretary of State certified the results of the 2020 presidential election on November 20, 2020; Michigan’s Secretary of State certified the results of the 2020 presidential election on November 23, 2020; Wisconsin certified the results of the 2020 presidential election on November 30, 2020, and Arizona’s Secretary of State certified the 2020 presidential election on November 30, 2020.

4. The allegations in Paragraph 4 are an attempt to characterize the contents of a written document, which speaks for itself and requires no response. However, to the extent that a response is required, Respondent Haller denies the allegations and avers that she did not control or have authority to control the litigation, but merely assisted in preparing portions of the subject cases working at the equivalent level of an “associate” attorney who was supervised by more senior counsel.

5. The allegations in Paragraph 5 are an attempt to characterize the contents of a written document, which speaks for itself and requires no response. However, to the extent that a response is required, Respondent Haller denies the allegations and avers that the allegations rely exclusively on the Michigan complaint. For example, the alleged relief does not appear in the Arizona complaint in *Bowyer v. Ducey*. As further response to this Paragraph, Respondent incorporates her answer to Paragraph 3.

6. Respondent Haller denies the allegations in Paragraph 6. As further response to this Paragraph, Respondent incorporates the answer to Paragraph 3.

7. Respondent Haller denies the allegations in Paragraph 7. Respondent further denies a significant role in obtaining the various procedural rulings, noting that the relevant courts did not hold a hearing on the merits. For example, the Wisconsin complaint was dismissed for procedural reasons, without a merits determination, as explained by the court:

In an abundance of caution, the court notes that if it did have jurisdiction to rule on the motion, it would not have awarded fees under 28 U.S.C. §1927. ...But the court has no basis on which to conclude that the plaintiff was “dilatory” or that he needlessly delayed proceedings; if anything (as the defendant also has argued), the plaintiff was pushing an extremely expedited schedule, which the court and the defendants struggled to accommodate.

The heart of the defendant’s motion is his argument that the plaintiff should not have filed suit to begin with and that the claims the plaintiff brought were not just meritless, but frivolous. This argument harkens back to the Overnite court’s reference to other courts that had imposed §1927 sanctions for cases that were patently without merit. But this court never reached the merits of the plaintiff’s claims. As the plaintiff has argued, the court dismissed the case on procedural grounds.

*Feehan v. Wisconsin Elections Comm'n*, No. 20-CV-1771-PP, 2022 WL 3647882, at \*10 (E.D. Wis. Aug. 24, 2022), *aff’d sub nom. Feehan v. Evers*, No. 22-2704, 2023 WL 4928520 (7th Cir. Aug. 2, 2023), *cert. denied sub nom. Evers v. Dean*, No. 23-697, 2024 WL 674838 (U.S. Feb. 20, 2024). *See also Keene Corp. v. Cass*, 908 F.2d 293, 298 (8th Cir. 1990) (holding “[w]here a complaint has been dismissed for lack of subject matter jurisdiction, the [d]efendant has not ‘prevailed’ over the plaintiff on any issue central to the merits of the litigation”); and *Ecogen, LLC v. Town of Italy*, 461 F. Supp. 2d 100, 102 (W.D.N.Y. 2006) (citing *Keene Corp.*).

### **The Presidential Election in Michigan<sup>2</sup>**

8. Respondent Haller denies the allegations in Paragraph 8. On information and belief, Michigan’s certified results on November 23, 2020,

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<sup>2</sup> Respondent does not respond to, or incorporate, the self-serving section headings used in the Specification of Charges. To the extent a response is required, Respondent denies the allegations contained therein.

which showed a plurality of 154,188 votes in favor of former Vice-President Joe Biden over the incumbent President Trump.

9. Respondent Haller lacks sufficient knowledge or information to admit or deny the allegations in Paragraph 9 and therefore, denies the same.

10. Respondent Haller lacks sufficient knowledge or information to admit or deny the allegations in Paragraph 10 and therefore, denies the same.

11. Respondent Haller denies the factual allegations contained in Paragraph 11. The remaining allegations allege a legal conclusion and/or argument to which no response is required. However, to the extent that a response is required, Respondent denies the allegations and avers that the Amended Complaint filed in *King v. Whitmer* speaks for itself and cites Michigan law, including:

- a. An election challenger shall be provided a space within a polling place where they can observe the election procedure and each person applying to vote. MCL § 168.733(1).
- b. An election challenger must be allowed the opportunity to inspect poll books as ballots are issued to electors and witness the electors' names being entered in the poll book. MCL § 168.733(1)(a).
- c. An election Challenger must be allowed to observe the manner in which the duties of the election inspectors are being performed. MCL § 168.733(1)(b).
- d. An election challenger is authorized to challenge the voting rights of a person who the challenger has good



reason to believe is not a registered elector. MCL § 168.733(1)(c).

- e. An election challenger is authorized to challenge an election procedure that is not being properly performed. MCL § 168.733(1)(d).
- f. An election challenger may bring to an election inspector's attention any of the following: (1) improper handling of a ballot by an elector or election inspector; (2) a violation of a regulation made by the board of election inspectors with regard to the time in which an elector may remain in the case...

See ECF # 6 at ¶ 43 in *King v. Whitmer*, Case no. 2:20-cv-13134-LVP-RSW (November 29, 2020). In addition, the Amended Complaint, filed on November 29, 2020, cites the Michigan Constitution and procedures available thereunder:

Various provisions of the Michigan Election Code also give any citizen the right to bring an election challenge within 30 days of an election where, as here, it appears that a material fraud or error has been committed. See, e.g., *Hamlin v. Saugatuck Twp.*, 299 Mich. App. 233, 240-241 (2013) (citing *Barrow v. Detroit Mayor*, 290 Mich. App. 530 (2010)); MCL § 168.31a (setting forth election audit requirements); MCL § 168.861 (*quo warranto* remedy for fraudulent or illegal voting).

*Id.* at ¶ 210. Further, the U.S. Court of Appeals for the Sixth Circuit explained:

Speech outside the courtroom is what the district court apparently found objectionable here. But that speech did not show that counsel were “motivated by improper purposes such as harassment or delay,” which means it was irrelevant to the district court’s inquiry. *First Bank of Marietta v. Hartford*

*Underwriters Ins. Co.*, 307 F.3d 501, 519 (6th Cir. 2002). And contesting election results is not itself an improper purpose for litigation. See, e.g., *Bush v. Gore*, 531 U.S. 98 (2000); *Moss v. Bush*, 828 N.E.2d 994 (Ohio 2005); *Coleman v. Ritchie*, 762 N.W.2d 218 (Minn. 2009). Nor does the record show that counsel were otherwise motivated by improper purposes. *First Bank*, 307 F.3d at 519. Thus, the district court did not identify any improper purpose supporting the imposition of sanctions under Rule 11(b)(1).

*King v. Whitmer, et al.*, (Jun. 23, 2023), No. 21-1786 at p. 7.

12. The allegations in Paragraph 12 are an attempt to characterize the contents of a written document, which speaks for itself and requires no response. However, to the extent that a response is required, Respondent Haller denies the allegations.

13. The allegations in Paragraph 13 are an attempt to characterize the contents of a written document, which speaks for itself and requires no response. However, to the extent that a response is required, Respondent Haller denies the allegations and notes the holding by the U.S. Court of Appeals for the Seventh Circuit:

...And contesting election results is not itself an improper purpose for litigation. See, e.g., *Bush v. Gore*, 531 U.S. 98 (2000); *Moss v. Bush*, 828 N.E.2d 994 (Ohio 2005); *Coleman v. Ritchie*, 762 N.W.2d 218 (Minn. 2009). Nor does the record show that counsel were otherwise motivated by improper purposes. *First Bank*, 307 F.3d at 519. Thus, the district court did not identify any

improper purpose supporting the imposition of sanctions under Rule 11(b)(1).

*King v. Whitmer, et al.*, (Jun. 23, 2023), No. 21-1786 at p. 7.

14. The allegations in Paragraph 14 are an attempt to characterize the contents of a written document, which speaks for itself and requires no response. However, to the extent that a response is required, Respondent Haller denies the allegations and incorporates the answer to Paragraph 13.

15. The allegations in Paragraph 15 are an attempt to characterize the contents of a written document, which speaks for itself and requires no response. However, to the extent that a response is required, Respondent Haller denies the allegations and incorporates the answer to Paragraph 13. Respondent further denies the allegation regarding an absence of factual basis for the claims and avers that no evidentiary hearings were held, the case did not proceed to discovery, and the court did not reach the merits of the case (as it found a lack of subject matter jurisdiction):

The Court begins by discussing those questions that go to matters of subject matter jurisdiction or which counsel against reaching the merits of Plaintiffs' claims. While the Court finds that any of these issues, alone, indicate that Plaintiffs' motion should be denied, it addresses each to be thorough.

ECF # 62 at p.7, *King v. Whitmer*, Case No. 20-cv-13134, District Court's Mem. Op. and Order, (E.D. MI Dec. 7, 2020).

16. The allegations in Paragraph 16 are an attempt to characterize the contents of a written document, which speaks for itself and requires no response. However, to the extent that a response is required, Respondent Haller denies the allegations and incorporates the answer to Paragraph 3.

17. Respondent Haller denies the allegations in Paragraph 17 and incorporates the answer to Paragraphs 3 and 16. Respondent also notes that the federal provisions governing the appointment of electors to the Electoral College are found in 3 U.S.C. §§ 1-18, which require the Michigan Governor to prepare a Certificate of Ascertainment by December 14, the date the Electoral College meets.

18. Respondent Haller denies the allegations in Paragraph 18. The allegations ignore that the District Court was reversed in part and affirmed in part. *See King v. Whitmer*, 71 F.4th 511, 529 (6th Cir. 2023). As a further answer to this Paragraph, Respondent incorporates the answer to Paragraph 15.

19. Respondent Haller denies the allegations in Paragraph 19 and notes that she did not have control, or the authority to control, the final allegations contained in the complaints. Respondent notes that attached to a letter signed by Congressional Representative Carolyn Maloney (D-NY),

dated October 6, 2006, is an exhibit to the Amended Complaint filed in Michigan, which reads:

It is undisputed that Smartmatic is foreign-owned, and it has acquired Sequoia, one of the three major voting machine companies doing business in the U.S. According to a Sequoia press release in May 2006 (copy attached) Sequoia voting machines were used to record over 125 million votes during the 2004 Presidential election in the United States. As we confront another election, Americans deserve to know that the Administration has made sure that any foreign ownership of voting machines poses no national security threat.

Although many press reports have tried, it appears that it is not possible to discern the true owners of Smartmatic from information available to the public. Smartmatic now acknowledges that Antonio Mugica, a Venezuelan businessman, has a controlling interest in Smartmatic, but the company has not revealed who all the other Smartmatic owners are. According to the press, Smartmatic's owners are hidden through a web of off-shore private entities. (See attached articles.) The opaque nature of Smartmatic's ownership is particularly troubling since Smartmatic has been associated by the press with the Venezuelan government led by Hugo Chavez, which is openly hostile to the United States. According to press reports, Smartmatic shared a founder, officers, directors and a principal place of business with Bizta, a company in which, according to Smartmatic, the Venezuelan government previously held a 28% stake. Mugica is also a director of Bizta.

*See* ECF # 06-15, *King v. Whitmer*, Case No. 20-cv-13134 (E.D. Mich. 2021).

In addition, a publicly available 2006 report by the Wall Street Journal states

that Smartmatic is “owned by Venezuelan entrepreneurs” and owned Sequoia until selling it to avoid an investigation. *See* Bob Davis, Smartmatic to shed U.S. unit, End Probe into Venezuelan links, WSJ.com (Dec. 22, 2006) available at <https://www.wsj.com/articles/SB116674617078557263>. The article explains:

In 2006, Smartmatic chose to “shed Sequoia” after a DOJ probe:

Sequoia voting machines were used in 16 states and the District of Columbia in 2006. Smartmatic, which has revenue of about \$100 million, focuses on Venezuela and other markets outside the U.S. After selling Sequoia, **Mr. Mugica said, he hoped Smartmatic would work with Sequoia on projects in the U.S., though Smartmatic wouldn't take an equity stake. The proposed sale may dim the spotlight on the Justice Department probe and make it easier to resolve.** Among the issues the department is looking at are whether Smartmatic paid bribes to Venezuelan officials to win an election contract in 2004 and failed to pay taxes owed in the U.S. Smartmatic said it is cooperating with that probe and that the Justice Department hasn't issued any subpoenas to Smartmatic employees.

*Id.* (emphasis added). In 2010, Dominion Voting Systems announced its purchase of Sequoia's Voting Systems inventory and all of its intellectual property including software, etc. This purchase is confirmed by the EAC, which logically includes Smartmatic's footprint. The press release is set out below:

June 4, 2010  
FOR IMMEDIATE RELEASE

For Information Contact:  
Dominion Voting Systems  
404-955-9799  
[media@dominionvoting.com](mailto:media@dominionvoting.com)

## **Dominion Voting Systems Corporation Acquires Assets of Sequoia Voting Systems**

***Transaction Further Expands Dominion's Geographic Reach; Retention of Sequoia Employees and Acquisition of Facilities Will Assure Seamless Transition for Current Sequoia Customers***

**JAMESTOWN, New York** .... Dominion Voting Systems Corporation today announced that it has acquired the assets of Sequoia Voting Systems, a major U.S. provider of voting solutions serving nearly 300 jurisdictions in 16 states. As part of the transaction, Dominion has acquired Sequoia's inventory and all intellectual property, including software, firmware and hardware, for Sequoia's precinct and central count optical scan and DRE voting solutions, including BPS, WinEDS, Edge, Edge2, Advantage, Insight, InsightPlus and 400C systems. Dominion will also retain Sequoia's facilities in Denver, Colorado and San Leandro, California and will consolidate Sequoia's Jamestown, New York facility with Dominion's existing Jamestown facility. Dominion has hired Sequoia's customer service and technical personnel to ensure capable, experienced and responsive customer service for all current Sequoia jurisdictions.

*See also Brad Friedman, EXCLUSIVE: On Heels of Diebold/Premier Purchase, Canadian eVoting Firm Dominion Also Acquires Sequoia, Lies About Chavez Ties in Announcement, HuffPost.com (June 22, 2010), [https://www.huffpost.com/entry/exclusive-on-heels-of-die\\_b\\_620084?guccounter=1](https://www.huffpost.com/entry/exclusive-on-heels-of-die_b_620084?guccounter=1) (which links to the press release of June 4, 2010).*

Also, the New York Times reported: "Dominion grew fast, acquiring the assets of a competitor, Sequoia Voting Systems, in 2010...Among Sequoia's staff was Eric Coomer, who became Dominion's vice president of engineering for the United States. ... (The investment firm Staple Street Capital owns a majority share in the company.)" Susan Dominus, *He Was The Perfect Villain For Voting Conspiracists. Eric Coomer had an election-*

*security job at Dominion Voting Systems. He also had posted anti-Trump messages on Facebook. What happened next ruined his life.* New York Times Magazine, (August 24, 2021), <https://www.nytimes.com/2021/08/24/magazine/eric-coomer-dominion-election.html>.

Additional publicly available information reveals that on January 9, 2020, the House Administration Committee chaired by Zoe Lofgren (D-Ca), held a Hearing on Election Security which included John Poulous, the CEO of Dominion Voting Systems; Julie Mathis, the CEO of Hart InterCivic; and Tom Burt, the CEO of Election Systems & Software and testimony. A relevant excerpt to the question of ownership:

Q: Okay. Now, I asked if you were all corporations. Will you tell me yes or no, are any of you run by private holding companies, private equity companies?

A: We are run by our executive management team, but we have 80% ownership by local private investment group.

Q: How about you?

A: Similarly, we are run by our management team, and we are owned I believe 76% by AWE U.S. Private equity firm.

Q: Miss Mathis?

A: Similar.



**Susan Davis, D-CA: Do you see why we are concerned? These are going to be questions raised by both Democrats and Republicans in the future. I appreciate you being here...**

C-Span (Jan. 9, 2020) <https://www.c-span.org/video/?467976-1/2020-election-security> (emphasis added) (full text inserted from audio).

As previously represented to to Bar Counsel, Respondent was principally involved in the Arizona litigation, where the final filing alleges:

Another Affiant witness testifies that in Venezuela, she was in official position related to elections and witnessed manipulations of petitions to prevent a removal of President Chavez and because she protested, she was summarily dismissed. She explains the vulnerabilities of the electronic voting system and Smartmatic to such manipulations. (See Ex. 17, Cardozo Aff.'s).

See Complaint in *Bowyer v Ducey*, 2:20-cv-02321-DJH at ¶ 75.

20. Respondent Haller denies the allegations in Paragraph 20 and further denies that she filed the claims. Respondent Haller also notes that no evidentiary hearing was held, the case did not proceed to discovery, and the court did not reach the merits but dismissed for lack of subject matter jurisdiction. Respondent further avers that evidence demonstrated federal government concerns regarding cyber intrusions by Chinese and Iranian actors. Respondent also notes that the superficial background attacks against a potential witness known as “Spider” were/are based on inuendo. The witness

was not deposed and did not testify but possesses qualifications the justify references to his opinions.

21. Respondent Haller denies the allegations in Paragraph 21 and further denies that she filed this claim.

22. Respondent Haller denies the allegations in Paragraph 22 and further denies that she filed this claim. Respondent also did not appear in this action on behalf of the plaintiffs. Among the evidence demonstrating that Dominion hardware connects to the internet is the House Administrative Committee's Hearing on January 9, 2020, which showed that all three manufacturers use precinct-level machines and/or voting tabulator machines that use internet connections. *See* C-Span (Jan. 9, 2020) <https://www.c-span.org/video/?467976-1/2020-election-security> at 1:34:54 – 1:36:14 (full text from audio). Respondent also notes that Mr. Colbeck also took a series of pictures attached to his November 8, 2020, testimony showing cables connecting the machines to the internet, as well as screenshots from his phone showing that the Electronic Poll Books were also connected wirelessly to the Internet and used this data to create a network topology for the Detroit TCF Center Absentee Ballot Voter Counting Board.

23. Respondent Haller denies the allegations in Paragraph 23, and repeats and incorporates her earlier responses.

24. Respondent Haller denies the allegations in Paragraph 24, and repeats that she did not appear in this action on behalf of plaintiffs.

25. Respondent Haller denies the allegations in Paragraph 25 and repeats that she did not appear in this action on behalf of plaintiffs. Respondent also notes that the parties did not designate experts. Instead, information was included in the complaint, which attached reports and CVs from certain professionals who provided analysis in anticipation of potential expert testimony. There are no “misrepresentations” regarding anticipated testimony from these potential experts as, on information and belief, each reference to an anticipated expert opinion cites to a corresponding report exhibit.

26. Respondent Haller denies the allegations in Paragraph 26 and repeats that she did not appear in this action on behalf of a plaintiff. Respondent further denies working on the 2020 or early 2021 appeals to the Supreme Court.

27. Respondent Haller denies the allegations in Paragraph 27 and repeats that she did not appear in this action and avers that she did not have the authority, or control, to file, dismiss, withdraw or amend claims. As further answer to this Paragraph, Respondent incorporates the Answer to Paragraph 22.

28. Respondent Haller denies the allegations in Paragraph 28 and repeats that she did not appear in this action on behalf of plaintiffs and avers that she did not have the authority, or control, to withdraw, amend or dismiss claims.

29. The allegations in Paragraph 29 are an attempt to characterize the contents of a written Order, which speaks for itself and requires no response. Respondent further notes that the District Court was affirmed in part and reversed in part by the U.S. Court of Appeals for the Sixth Circuit. *See King*, 71 F.4th 511.

30. The allegations in Paragraph 30 are an attempt to characterize the contents of a written Order, which speaks for itself and requires no response. Respondent further notes that the District Court was affirmed in part and reversed in part by the U.S. Court of Appeals for the Sixth Circuit. *See King*, 71 F.4th 511.

31. The allegations in Paragraph 31 are an attempt to characterize the contents of a written Order, which speaks for itself and requires no response. Respondent further notes that the District Court was affirmed in part and reversed in part by the U.S. Court of Appeals for the Sixth Circuit. *See King*, 71 F.4th 511.

32. Respondent Haller denies the allegations in Paragraph 32 and repeats that she did not appear in this action and avers that she did not have the authority, or control, to file, dismiss, withdraw or amend claims.

33. Respondent Haller denies the allegations in Paragraph 33 and repeats that she did not appear in this action on behalf of plaintiffs and avers that she did not have the authority, or control, to file, dismiss, withdraw or amend motions or pleadings. She further denies filing or signing a petition for writ of certiorari with the Supreme Court on December 11, 2020. Respondent Haller is not admitted to practice before the United States Supreme Court.

34. Respondent Haller denies the allegations in Paragraph 34 and repeats that she did not appear in this action and avers that she did not have the authority, or control, to file, dismiss, withdraw or amend motions or pleadings. She further denies filing or signing any motion with the Supreme Court. Respondent Haller is not admitted to practice before the United States Supreme Court.

35. Respondent lacks sufficient information to admit or deny the allegations in Paragraph 35 and denies the same.

36. Respondent Haller denies the allegations in Paragraph 36 and repeats that she did not appear in this action and avers that she did not have

the authority, or control, to file, dismiss, withdraw or amend motions or pleadings in *King v. Whitmer*.

37. Respondent Haller denies the allegations in Paragraph 37 and repeats that she did not appear in this action and avers that she did not have the authority, or control, to file, dismiss, withdraw or amend motions or pleadings in *King v. Whitmer*.

38. Respondent Haller denies the allegations in Paragraph 38 and repeats that she did not appear in this action. Respondent further denies filing or signing a petition for writ of certiorari with the Supreme Court on December 11, 2020. Respondent Haller is not admitted to practice before the United States Supreme Court.

39. The allegations in Paragraph 39 are an attempt to characterize the contents of a written Order, which speaks for itself and requires no response. Respondent further notes that the District Court was affirmed in part and reversed in part by the U.S. Court of Appeals for the Sixth Circuit. *See King*, 71 F.4th 511.

40. The allegations in Paragraph 40 are an attempt to characterize the contents of a written Order, which speaks for itself and requires no response. Respondent further notes that the District Court was affirmed in part and

reversed in part by the U.S. Court of Appeals for the Sixth Circuit. *See King*, 71 F.4th 511.

41. The allegations in Paragraph 41 are an attempt to characterize the contents of a written Order, which speaks for itself and requires no response. Respondent further notes that the District Court was affirmed in part and reversed in part by the U.S. Court of Appeals for the Sixth Circuit. *See King*, 71 F.4th 511.

42. The allegations in Paragraph 42 are an attempt to characterize the contents of a written Order, which speaks for itself and requires no response. Respondent further notes that the District Court was affirmed in part and reversed in part by the U.S. Court of Appeals for the Sixth Circuit. *See King*, 71 F.4th 511.

43. The allegations in Paragraph 43 are an attempt to characterize the contents of a written document, which speaks for themselves and require no response.

44. The allegations in Paragraph 44 are an attempt to characterize the contents of a written document, which speaks for themselves and require no response.

45. Respondent denies the allegations in paragraph 45, including each subpart.

## **The Presidential Election in Georgia**

46. On information and belief, Georgia's Secretary of State certified the results of the 2020 presidential election on November 20, 2020, with Biden narrowly winning Georgia by a margin of 0.23% or 11,779 votes. The certification was more than two weeks after the presidential election of November 3, 2020.

47. Respondent lacks sufficient information to admit or deny the allegations in Paragraph 47 and denies the same.

48. Respondent lacks sufficient information to admit or deny the allegations in Paragraph 48 and denies the same. In further answer to this Paragraph, Respondent notes the Joint Cybersecurity Advisory issued on October 30, 2020, wherein the FBI and CISA identified intentional targeting of the U.S. state election website to interfere with the 2020 U.S. presidential election.

49. Respondent lacks sufficient information to admit or deny the allegations in Paragraph 49 and denies the same.

50. Respondent lacks sufficient information to admit or deny the allegations in Paragraph 50 and denies the same.

51. Respondent Haller denies the allegations in Paragraph 51, including the characterization of her as "co-counsel." Respondent admits she



submitted a *Pro Hac Vice* Application on behalf of plaintiffs in the Georgia litigation.

52. The allegations in Paragraph 52 regarding the contents of the Complaint are an attempt to characterize the contents of a written document, which speaks for itself and requires no response. Respondent Haller denies the remaining allegations in Paragraph 51, including the characterization of her as “co-counsel.”

53. Respondent Haller admits only that she entered an appearance in the Georgia litigation by submitting a *pro hac vice* Application on behalf of plaintiffs. The allegations in Paragraph 53 regarding the contents of the Complaint are an attempt to characterize the contents of a written document, which speaks for itself and requires no response. Respondent Haller denies the remaining allegations in Paragraph 53, including the characterization “Respondent Haller’s claims.”

54. The allegations in Paragraph 54 are an attempt to characterize the contents of written documents, which speaks for themselves and require no response. Respondent Haller denies the remaining allegations in Paragraph 54, including the characterization of her as “co-counsel.”

55. The allegations in Paragraph 55 are an attempt to characterize the contents of written documents, which speaks for themselves and require no

response. Respondent Haller denies the remaining allegations in Paragraph 55, including the characterization of her as “co-counsel.”

56. Respondent Haller denies the allegations in Paragraph 56.

57. The allegations in Paragraph 57 are an attempt to characterize the contents of written documents, which speaks for themselves and require no response. Respondent Haller denies the remaining allegations in Paragraph 57, including the characterization of her as “co-counsel.” Respondent further notes that the plaintiffs in *Pearson v. Kemp* were not plaintiffs in Mr. Wood’s case.

58. The allegations in Paragraph 58 are an attempt to characterize the contents of a written Order, which speaks for itself and requires no response. Respondent Haller denies the remaining allegations in Paragraph 58. On information and belief, Respondent Haller avers that *Wood v. Raffensperger* was denied without an evidentiary hearing to determine merit and was, instead, dismissed for lack of standing.

59. The allegations in Paragraph 59 are an attempt to characterize the contents of written documents, which speak for themselves and require no response. Respondent Haller denies the remaining allegations in Paragraph 59, including the characterization of her as “co-counsel.”

60. The allegations in Paragraph 60 are an attempt to characterize the contents of written documents, which speaks for themselves and require no response. Respondent admits that exhibit copies filed for the publicly available Secretary of State certificate awarded to Dominion Voting Systems and the test report were mistakenly (and unintentionally) downloaded or saved in a format that precluded viewing the bottom of each page such that the dates were not visible. Respondent Haller denies the remaining allegations in Paragraph 60, including the characterization of her as “co-counsel.”

61. The allegations in Paragraph 61 are an attempt to characterize the contents of written documents, which speaks for themselves and require no response. Respondent Haller denies the remaining allegations in Paragraph 61, including the characterization of her as “co-counsel.”

62. The allegations in Paragraph 62 are an attempt to characterize the contents of written documents, which speak for themselves and require no response. Respondent Haller denies the remaining allegations in Paragraph 62, including the characterization of her as “co-counsel.” As a further answer to this Paragraph, Respondent incorporates the answer to Paragraph 13 and notes that the complaint sought only such “relief as is just and proper.” *Pearson v. Kemp*, 1:20-cv-4809-TCB (NDGA, Nov. 25, 2020), Compl. at p. 102, ¶ 14.

63. The allegations in Paragraph 63 are an attempt to characterize the contents of written documents, which speaks for themselves and require no response. Respondent Haller denies the remaining allegations in Paragraph 63, including the characterization of her as “co-counsel.” As a further answer to this Paragraph, Respondent notes that the complaint sought only such “relief as is just and proper.”

64. The allegations in Paragraph 64 are an attempt to characterize the contents of a written document, which speaks for itself and requires no response. Respondent Haller denies the remaining allegations in Paragraph 64, including the characterization of her as “co-counsel.” Respondent notes that the action was not dismissed on the merits but was, instead, dismissed for lack of standing, which means a lack of subject matter of jurisdiction.

65. The allegations in Paragraph 65 are an attempt to characterize the contents of a written document, which speaks for itself and requires no response. Respondent Haller denies the remaining allegations in Paragraph 65, including the characterization of her as “co-counsel.” As further answer, Respondent incorporates the answer to Paragraph 62 regarding relief “as is just and proper.”

66. The allegations in Paragraph 66 are an attempt to characterize the contents of a written Order, which speaks for itself and requires no response. Respondent Haller denies the remaining allegations in Paragraph 66.

67. The allegations in Paragraph 67 are an attempt to characterize the contents of written documents, which speak for themselves and require no response. Respondent Haller denies the remaining allegations in Paragraph 67, including the characterization of her as “co-counsel.”

68. Respondent denies the allegations in paragraph 68, including each subpart.

### **The Presidential Election in Wisconsin**

69. The allegations in Paragraph 69 are an attempt to characterize the contents of written documents, which speak for themselves and require no response. Respondent Haller notes that Vice-President Biden narrowly succeeded in Wisconsin by a margin of 0.63% or 20,565 votes, which was not determined until several weeks after the November 3, 2020, Presidential election.

70. The allegations in Paragraph 70 are an attempt to characterize the contents of a written document, which speaks for itself and requires no response. Respondent lacks sufficient information to admit or deny the remaining allegations in Paragraph 70 and denies the same.

71. To the extent that the allegations in Paragraph 71 are an attempt to characterize the contents of a written document, which speaks for itself and requires no response. Respondent lacks sufficient information to admit or deny the remaining allegations in Paragraph 71 and denies the same.

72. To the extent that the allegations in Paragraph 72 are an attempt to allege a legal conclusion, no response is required. The remaining allegations in Paragraph 72 are an attempt to characterize the contents of a written document, which speaks for itself and requires no response. Respondent denies the remaining allegations in Paragraph 72, including the characterization of her as “co-counsel.”

73. The allegations in Paragraph 73 are an attempt to characterize the contents of a written document, which speaks for itself and requires no response. Respondent denies the remaining allegations in Paragraph 73, including the characterization of her as “co-counsel.” Respondent further notes that the Complaint seeks only “relief as is just and proper.”

74. Respondent Haller denies the allegations in Paragraph 74, including the characterization of her as “co-counsel.”

75. The allegations in Paragraph 75 are an attempt to characterize the contents of a written document, which speaks for itself and requires no response. Respondent denies the remaining allegations in Paragraph 75 and

avers that the Docket shows the Amended Complaint, exhibits and reports in support thereof, were based on findings specific to the state of Wisconsin on behalf of different parties.

76. Respondent Haller denies the allegations in Paragraph 76. Respondent further notes that she neither communicated with the plaintiff(s), nor did she file either the initial Complaint or the Amended Complaint.

77. The allegations in Paragraph 77 are an attempt to characterize the contents of a written document, which speaks for itself and requires no response. Respondent denies the remaining allegations in Paragraph 77.

78. The allegations in Paragraph 78 are an attempt to characterize the contents of a written document, which speaks for itself and requires no response. Respondent denies the remaining allegations in Paragraph 78, including the characterization of her as “co-counsel.”

79. The allegations in Paragraph 79 are an attempt to characterize the contents of a written document, which speaks for itself and requires no response. Respondent denies the remaining allegations in Paragraph 79. Respondent Haller further notes that the Amended Complaint relied on opinions from multiple witnesses regarding absentee ballots and disparities in multiple counties.

80. The allegations in Paragraph 80 allege a legal conclusion to which no response is required. Respondent Haller denies the remaining allegations in Paragraph 80.

81. Respondent Haller denies the allegations in Paragraph 81. Respondent further notes that she neither communicated with the plaintiff(s), nor did she file either the initial Complaint or the Amended Complaint.

82. Respondent Haller denies the allegations in Paragraph 82. Respondent further notes that the Amended Complaint relied on opinions from multiple witnesses.

83. The allegations in Paragraph 83 are an attempt to characterize the contents of a written document, which speaks for itself and requires no response. Respondent denies the remaining allegations in Paragraph 83. She further denies filing or signing a petition for writ of certiorari with the Supreme Court.

84. The allegations in Paragraph 84 are an attempt to characterize the contents of a written document, which speaks for itself and requires no response. Respondent denies the remaining allegations in Paragraph 84.

85. The allegations in Paragraph 85 are an attempt to characterize the contents of a written document, which speaks for itself and requires no



response. Respondent denies the remaining allegations in Paragraph 85, including the characterization of her as “co-counsel.”

86. The allegations in Paragraph 86 are an attempt to characterize the contents of a written document, which speaks for itself and requires no response. Respondent denies the remaining allegations in Paragraph 86, including the characterization of her as “co-counsel.” Respondent Haller further notes that the Amended Complaint only requested “relief as is just and proper.”

87. The allegations in Paragraph 87 are an attempt to characterize the contents of a written document, which speaks for itself and requires no response. Respondent denies the remaining allegations in Paragraph 87, including the characterization of her as “co-counsel.” Respondent Haller further notes that the Amended Complaint only requested “relief as is just and proper.”

88. The allegations in Paragraph 88 are an attempt to characterize the contents of a written document, which speaks for itself and requires no response. Respondent denies the remaining allegations in Paragraph 88, including the characterization of her as “co-counsel.” Respondent Haller further notes that the Amended Complaint only requested “relief as is just and proper.”

89. The allegations in Paragraph 89 are an attempt to characterize the contents of a written document, which speaks for itself and requires no response. Respondent denies the remaining allegations in Paragraph 89.

90. The allegations in Paragraph 90 are an attempt to characterize the contents of a written document, which speaks for itself and requires no response. Respondent denies the remaining allegations in Paragraph 90, including the characterization of her as “co-counsel.” Respondent Haller further denies filing or signing a petition for writ of certiorari with the Supreme Court. Respondent Haller is not admitted in the United States Supreme Court.

91. Respondent lacks sufficient information to admit or deny the allegations in Paragraph 91 and therefore, denies the same. Respondent Haller further denies the characterization of “Respondents’ petition” as she did not file or sign a petition for writ of certiorari with the Supreme Court.

92. Respondent lacks sufficient information to admit or deny the allegations in Paragraph 92 and therefore, denies the same, including the characterization of her as “co-counsel”.

93. Respondent denies the allegations in paragraph 93, including each subpart.

## The Presidential Election in Arizona

94. Respondent Haller lacks sufficient information to either admit or deny the allegations in Paragraph 94 and therefore, denies the same. Respondent notes that the November 3, 2020, Presidential election results were not certified until November 30, 2020, and showed a final difference of 10,457 tallied votes in favor of former Vice-President over the Incumbent President, a 0.3% margin.

95. The allegations in Paragraph 95 allege a legal conclusion to which no response is required. To the extent that a response is required, Respondent Haller lacks sufficient information to either admit or deny the allegations in Paragraph 95 and therefore, denies the same.

96. The allegations in Paragraph 96 allege a legal conclusion to which no response is required. To the extent that a response is required, Respondent Haller lacks sufficient information to either admit or deny the allegations in Paragraph 96 and therefore, denies the same. In further response, Respondent notes that Arizona law, A.R.S. § 16-672(B), makes clear that an election challenge “*may*” be brought in Superior Court, but contains no language requiring election challenges to be brought in Superior Court. A federal court is the appropriate venue to adjudicate mixed constitutional and state-based claims in a federal election.

97. Respondent denies the allegations in Paragraph 97, including the characterization of her as “co-counsel.” As a further response, Respondent Haller incorporates the answer to Paragraph 96.

98. The allegations in Paragraph 98 are an attempt to characterize the contents of a written document, which speaks for itself and requires no response. Respondent denies the remaining allegations in Paragraph 98, including the characterization of her as “co-counsel.” Respondent Haller further denies that the Prayer for Relief Clause included, “overturning the presidential election results in Arizona” and avers that it limited the request to “relief as is Just and Proper.” *See* Complaint at ¶ 145, subparagraph 11 in *Bowyer v. Ducey*, Case No. 2:20-cv-02321-DJH (D. Ariz.).

99. The allegations in Paragraph 99 are an attempt to characterize the contents of a written document, which speaks for itself and requires no response. Respondent denies the remaining allegations in Paragraph 99.

100. The allegations in Paragraph 100 are an attempt to characterize the contents of a written document, which speaks for itself and requires no response. Respondent denies the remaining allegations in Paragraph 100. As a further response, Respondent Haller notes that the court issued an Order of Dismissal finding a failure to state a claim and a lack of standing on December 9, 2020. *See* ECF # 84 in *Bowyer v. Ducey*, 2:20-cv-02321-DJH (Dec. 9, 2020)

(D. Ariz.). Following this ruling, the court vacated the scheduled evidentiary hearing of Dec. 10, 2020. Therefore, Plaintiff's evidence was not heard on the merits.

The U.S. District Court for Arizona did not make a finding of frivolousness but instead stated, in relevant part:

**And so I appreciate the diligence of the parties in getting this briefed so quickly, and I ask for your patience as I weed through all of these fairly complex issues and very important issues to both parties as well as the citizenry of Arizona...**

*See* Transcript of Proceedings Video Teleconference, Oral Arguments, before the Honorable Diane J. Humetewa, Judge, December 8, 2020, 9:21 a.m., pp. 42-44.

101. The allegations in Paragraph 101 are an attempt to characterize the contents of a written document, which speaks for itself and requires no response. Respondent denies the remaining allegations in Paragraph 101. Respondent Haller further submits that reports based on anticipated experts' opinions attached in support of the Arizona complaint included findings specific to Arizona.

102. The allegations in Paragraph 102 are an attempt to characterize the contents of a written document, which speaks for itself and requires no response. Respondent denies the remaining allegations in Paragraph 102.

103. The allegations in Paragraph 103 are an attempt to characterize the contents of a written document, which speaks for itself and requires no response. Respondent Haller denies the remaining allegations in Paragraph 103.

104. The allegations in Paragraph 104 are an attempt to characterize the contents of a written document, which speaks for itself and requires no response. Respondent denies the remaining allegations in Paragraph 104, including the characterization of her as “co-counsel.”

105. The allegations in Paragraph 105 are an attempt to characterize the contents of a written document, which speaks for itself and requires no response. Respondent denies the remaining allegations in Paragraph 105, including the characterization of her as “co-counsel.”

106. The allegations in Paragraph 106 are an attempt to characterize the contents of a written document, which speaks for itself and requires no response. Respondent denies the remaining allegations in Paragraph 106, including the characterization of her as “co-counsel.”

107. Respondent Haller denies the allegations in Paragraph 107.

108. The allegations in Paragraph 108 are an attempt to characterize the contents of a written document, which speaks for itself and requires no

response. Respondent denies the remaining allegations in Paragraph 108, including the characterization of her as “co-counsel.”

109. The allegations in Paragraph 109 are an attempt to characterize the contents of a written document, which speaks for itself and requires no response. Respondent denies the remaining allegations in Paragraph 109, including the characterization of her as “co-counsel.” Respondent Haller further denies filing or signing a petition for writ of certiorari with the Supreme Court in *Bowyer v. Ducey*.

110. The allegations in Paragraph 110 are an attempt to characterize the contents of a written document, which speaks for itself and requires no response. Respondent denies the remaining allegations in Paragraph 110, including the characterization of her as “co-counsel.”

111. The allegations in Paragraph 111 are an attempt to characterize the contents of a written document, which speaks for itself and requires no response. Respondent denies the remaining allegations in Paragraph 111, including the characterization of her as “co-counsel.”

112. The allegations in Paragraph 112 are an attempt to characterize the contents of a written document, which speaks for itself and requires no response. Respondent denies the remaining allegations in Paragraph 112, including the characterization of her as “co-counsel.”

113. The allegations in Paragraph 113 are an attempt to characterize the contents of written documents and Orders, which speaks for themselves and require no response. Respondent denies the remaining allegations in Paragraph 113.

114. The allegations in Paragraph 114 are based on a flawed legal conclusion to which no response is required. To the extent that a response is required, Respondent Haller denies the allegations in Paragraph 114.

115. On information and belief, Respondent admits that the Arizona complaint was dismissed by the District Court on December 9, 2020. Respondent Haller denies the remaining allegations in Paragraph 115.

116. The allegations in Paragraph 116 are an attempt to characterize the contents of a written Order, which speaks for itself and requires no response. Respondent denies the remaining allegations in Paragraph 116, including the characterization of “Respondents claims.”

117. The allegations in Paragraph 117 are an attempt to characterize the contents of a written Order, which speaks for itself and requires no response. Respondent denies the remaining allegations in Paragraph 117, including the characterization of “Respondents claims.”

118. The allegations in Paragraph 118 are an attempt to characterize the contents of a written Order, which speaks for itself and requires no



response. Respondent denies the remaining allegations in Paragraph 118, including the characterization of “Respondents claims.”

119. The allegations in Paragraph 119 are an attempt to characterize the contents of a written Order, which speaks for itself and requires no response. Respondent denies the remaining allegations in Paragraph 119.

120. Respondent Haller denies the allegations in Paragraph 120, including the characterization of her as “co-counsel.”

121. The allegations in Paragraph 121 are an attempt to characterize the contents of a written document, which speaks for itself and requires no response. Respondent denies the remaining allegations in Paragraph 121, including the characterization of her as “co-counsel.” Respondent Haller further denies filing or signing a petition for writ of certiorari with the Supreme Court. Respondent Haller is not admitted in the United States Supreme Court.

122. The allegations in Paragraph 122 are an attempt to characterize the contents of a written Order, which speaks for itself and requires no response. Respondent denies the remaining allegations in Paragraph 122, including the characterization as “Respondents’ petition.”

123. The allegations in Paragraph 123 are an attempt to characterize the contents of a written document, which speaks for itself and requires no

response. Respondent denies the remaining allegations in Paragraph 123, including the characterization of her as “co-counsel.”

124. Respondent denies the allegations in Paragraph 124, including each subpart.

### **The Texas Federal Court Action**

125. Respondent Haller denies the allegations in Paragraph 125, including the characterization of her as “co-counsel.” Respondent notes that she did file a *pro hac vice* Application in *Gohmert v. Pence*, 6:20-cv-00660, on December 12, 2020, a case raising a constitutional question (hereinafter “*Gohmert v. Pence*”).

126. The allegations in Paragraph 126 are an attempt to characterize the contents of a written document, which speaks for itself and requires no response. Respondent denies the remaining allegations in Paragraph 126, including the characterization of her as “co-counsel.”

127. The allegations in Paragraph 127 are an attempt to characterize the contents of a written document, which speaks for itself and requires no response. Respondent denies the remaining allegations in Paragraph 127, including the characterization of her as “co-counsel.”

128. Respondent Haller denies the allegations in Paragraph 128 and notes that an *Emergency Application To The Honorable Samuel A. Alito As*

*Circuit Justice For The Fifth Circuit For Administrative Stay And Interim Relief Pending Resolution Of A Timely Filed Petition For A Writ Of Certioraris* was filed in *Gohmert v. Pence* (not by Respondent). Justice Alito referred it to the Court, signaling that he believed the application was worthy of consideration, and not frivolous; however, it was dismissed on January 7, 2021, by which time, upon information and belief, it would have been moot. *See* Order of January 7, 2021 (stating “The application for interim relief presented to Justice Alito and by him referred to the Court is denied.”).

129. The allegations in Paragraph 129 assert a legal conclusion to which no response is required. To the extent that a response is required, Respondent Haller denies the allegations in Paragraph 129.

130. The allegations in Paragraph 130 assert a legal conclusion to which no response is required. To the extent that a response is required, Respondent Haller denies the allegations in Paragraph 130.

131. The allegations in Paragraph 131 are an attempt to characterize the contents of a written document, which speaks for itself and requires no response. Respondent denies the remaining allegations in Paragraph 131.

132. The allegations in Paragraph 132 are an attempt to characterize the contents of a written document, which speaks for itself and requires no response. Respondent denies the remaining allegations in Paragraph 132.

133. The allegations in Paragraph 133 assert a legal conclusion to which no response is required. To the extent that a response is required, Respondent Haller denies the allegations in Paragraph 133.

134. To the extent that the allegations in Paragraph 134 assert a legal conclusion, no response is required. To the extent that a response is required, Respondent Haller denies the allegations in Paragraph 134.

135. The allegations in Paragraph 135 are an attempt to characterize the contents of written documents, which speak for themselves and require no response. Respondent denies the remaining allegations in Paragraph 135.

136. The allegations in Paragraph 136 are an attempt to characterize the contents of a written document, which speaks for itself and requires no response. Respondent denies the remaining allegations in Paragraph 136.

137. The allegations in Paragraph 137 are an attempt to characterize the contents of a written Order, which speaks for itself and requires no response. Respondent denies the remaining allegations in Paragraph 137.

138. Respondent Haller denies the allegations in Paragraph 138.

139. Respondent Haller denies the allegations in Paragraph 139.

140. The allegations in Paragraph 140 are an attempt to characterize the contents of a written document, which speaks for itself and requires no response. Respondent denies the remaining allegations in Paragraph 140,

including the characterization of her as “co-counsel.” Respondent Haller further denies filing or signing a petition for writ of certiorari with the Supreme Court. Respondent Haller is not admitted in the United States Supreme Court.

141. On information and belief, Respondent admits the allegations in Paragraph 141.

142. Respondent denies the allegations in Paragraph 142, including each subpart.

143. Respondent denies each and every allegation in the Specification of Charges that is not expressly admitted herein and generally denies any disciplinary violation.

### **AFFIRMATIVE DEFENSES**

1. Respondent avers many of the allegations herein were caused or contributed to by the conduct of third parties over which Respondent had no right or ability to control.

2. The Specification of Charges fails to acknowledge Respondent Haller’s status as of counsel to the principal attorneys responsible for the actions at issue.

3. The Specification of Charges is not consistent with Rule 8.5(b) of the Rules of Professional Conduct.

4. The Specification of Charges fails to allege sufficient facts to support a disciplinary violation.

5. The Specification of Charges is not consistent with Respondent Haller's Constitutional rights of free speech, to redress wrongs by the government and constitutes viewpoint discrimination.

WHEREFORE, having fully answered the Grievance, Respondent Haller respectfully asks this Honorable Board to dismiss the Grievance and award such additional relief as it deems proper.

March 8, 2024

Respectfully submitted,

/s/

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Haller*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 8th day of March 2024, a copy of Respondent Haller's Answer was sent by email to:

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//s//

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Richard W. Driscoll