

**IN THE CIRCUIT COURT OF THE SECOND JUDICIAL CIRCUIT IN AND
FOR LEON COUNTY, FLORIDA**

CIRCUIT CIVIL DIVISION

CASE NO: 2024-CA-001976

ROBERT ROCHFORD,

Plaintiff,

v.

KATHY CASTOR, in her capacity
as the Democratic candidate for
U.S. Congressional District 14,
HILLSBOROUGH COUNTY
CANVASSING BOARD,
PINELLAS COUNTY
CANVASSING BOARD,
JULIE MARCUS, in her capacity
as Supervisor of Elections,
CRAIG LATTIMER, in his capacity
as Supervisor of Elections,
FLORIDA ELECTIONS CANVASSING
COMMISSION, and SECRETARY
OF STATE CORD BYRD,
in his capacity as Chief Elections Officer.

Defendants,

DEFENDANT, KATHY CASTOR'S AMENDED ANSWER TO VERIFIED COMPLAINT

The Defendant, KATHY CASTOR, hereby files this Amended Answer to the Verified Complaint and Contest of the November 5, 2024 General Election held in Florida for U.S. Congressional District 14 and states as follows:

1. Paragraph 1 contains legal statements to which no response is required. To the extent that paragraph 1 contains factual allegations, the Defendant is without knowledge or information concerning the allegations, therefore denied.

2. Admitted that Robert Rochford is the unsuccessful candidate with respect to the U.S. Congressional District 14 seat in Florida. The remainder of paragraph 2 contains legal statements to which no response is required. To the extent that paragraph 2 contains factual allegations, the Defendant is without knowledge or information concerning the allegations, therefore denied.

3. Admitted that Plaintiff, Robert Rochford, was a candidate in the U.S. Congressional District 14 seat in Florida, in the general election, which took place on November 5, 2024. Defendant is without knowledge or information concerning the remaining allegations, therefore denied.

4. Admitted that Mr. Rochford lost in the general election to the Defendant, Kathy Castor. Defendant is without knowledge or information concerning the remaining allegations, therefore denied.

Jurisdiction and Venue

5. Denied.

6. Denied.

The Parties

7. Admitted that the Plaintiff, Robert Rochford, was a candidate in the Republican primary election for Florida Congressional District 14 which is located in both Pinellas and Hillsborough County, Florida. Defendant is without knowledge or information concerning the remaining allegations, therefore denied.

8. Admitted.

9. Defendant is without knowledge or information concerning the allegations, therefore denied.

10. Defendant is without knowledge or information concerning the allegations, therefore denied.

11. Defendant is without knowledge or information concerning the allegations, therefore denied.

12. Admitted

13. Denied.

14. Admitted

Prefatory Statement

15. Admitted.

16. Defendant is without knowledge or information concerning the allegations, therefore denied.

17. Defendant is without knowledge or information concerning the allegations, therefore denied.

18. Defendant is without knowledge or information concerning the allegations, therefore denied.

19. Defendant is without knowledge or information concerning the allegations, therefore denied.

20. Defendant is without knowledge or information concerning the allegations, therefore denied.

21. Defendant is without knowledge or information concerning the allegations, therefore denied.

22. Defendant is without knowledge or information concerning the allegations, therefore denied.

23. Defendant is without knowledge or information concerning the allegations, therefore denied.

Factual Allegations Regarding Vote-by-Mail-Ballots

24. Paragraph 24 contains legal statements to which no response is required, To the extent that paragraph 24 contains factual allegations, Defendant is without knowledge or information concerning the allegations, therefore denied.

25. Paragraph 25 contains legal statements to which no response is required. To the extent that paragraph 25 contains factual allegations, Defendant is without knowledge or information concerning the allegations, therefore denied.

26. Paragraph 26 contains legal statements to which no response is required. To the extent that paragraph 26 contains factual allegations, Defendant is without knowledge or information concerning the allegations, therefore denied.

27. Paragraph 27 contains legal statements to which no response is required. To the extent that paragraph 27 contains factual allegations, Defendant is without knowledge or information concerning the allegations, therefore denied.

28. Paragraph 28 contains legal statements to which no response is required. To the extent that paragraph 28 contains factual allegations, Defendant is without knowledge or information concerning the allegations, therefore denied.

29. Paragraph 29 contains legal statements to which no response is required. To the extent that paragraph 29 contains factual allegations, Defendant is without knowledge or information concerning the allegations, therefore denied.

30. Defendant is without knowledge or information concerning the allegations, therefore denied.

31. Defendant is without knowledge or information concerning the allegations, therefore denied.

32. Defendant is without knowledge or information concerning the allegations, therefore denied.

33. Paragraph 33 contains legal statements to which no response is required. To the extent that paragraph 33 contains factual allegations, Defendant is without knowledge or information concerning the allegations, therefore denied.

34. Paragraph 34 contains legal statements to which no response is required. To the extent that paragraph 34 contains factual allegations, Defendant is without knowledge or information concerning the allegations, therefore denied.

35. Defendant is without knowledge or information concerning the allegations, therefore denied.

36. Defendant is without knowledge or information concerning the allegations, therefore denied.

37. Paragraph 37 contains legal statements to which no response is required. To the extent that paragraph 37 contains factual allegations, Defendant is without knowledge or information concerning the allegations, therefore denied.

38. Defendant is without knowledge or information concerning the allegations, therefore denied.

39. Paragraph 39 contains legal statements to which no response is required. To the extent that paragraph 39 contains factual allegations, Defendant is without knowledge or information concerning the allegations, therefore denied.

40. Defendant is without knowledge or information concerning the allegations, therefore denied.

41. Defendant is without knowledge or information concerning the allegations, therefore denied.

42. Paragraph 42 contains legal statements to which no response is required. To the extent that paragraph 42 contains factual allegations, Defendant is without knowledge or information concerning the allegations, therefore denied.

43. Paragraph 43 contains legal statements to which no response is required. To the extent that paragraph 43 contains factual allegations, Defendant is without knowledge or information concerning the allegations, therefore denied.

First Affirmative Defense

This Court lacks jurisdiction to hear any contest to congressional elections. See U.S. Const. Art. I, section 5, Cl. 1.

Second Affirmative Defense

Section 102.168, Fla. Stat. is in derogation of Florida Common Law and must be strictly construed. Plaintiff failed to comply with section 102.168(2), Fla. Stat., and, as such, the Complaint should be dismissed.

Third Affirmative Defense

This election contest action is barred by laches.

CERTIFICATE OF SERVICE

I certify that the foregoing instrument was served utilizing the Court E-Filing Portal on December 24, 2024.

/s/ Laura L. Vaughan Esq.
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