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21 **IN THE UNITED STATES DISTRICT COURT**  
22 **FOR THE DISTRICT OF ARIZONA**

23 Mi Familia Vota, et al.,

24 Plaintiffs,

25 v.

26 Adrian Fontes, in his official capacity as  
27 Arizona Secretary of State, et al.,

28 Defendants.

Case No. 2:22-cv-00509-SRB (Lead)

**INTERVENOR-DEFENDANT'S  
ANSWER TO THE UNITED STATES'  
COMPLAINT**

AND CONSOLIDATED CASES

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1 Intervenor—the Republican National Committee—now answers the United States’  
2 complaint (Doc. 1, No. 2:22-cv-01124). Unless expressly admitted below, every allegation  
3 in the complaint is denied. Because Plaintiffs often cite nothing, Intervenor does not know  
4 whether the referenced factual material exists, is accurate, or is placed in proper context.  
5 Accordingly, Intervenor states:

- 6 1. Admit that date HB 2492 was enacted; the rest is a legal argument requiring
- 7 no response.
- 8 2. Legal argument requiring no response.
- 9 3. Legal argument requiring no response.
- 10 4. Legal argument requiring no response.
- 11 5. Legal argument requiring no response.
- 12 6. Legal argument requiring no response.
- 13 7. Intervenor lacks sufficient information to admit or deny.
- 14 8. Legal argument requiring no response.
- 15 9. Intervenor lacks sufficient information to admit or deny as to the first sen-
- 16 tence; the rest is a legal argument requiring no response.
- 17 10. Legal argument requiring no response.
- 18 11. Legal argument requiring no response.
- 19 12. Legal argument requiring no response.

20 **JURISDICTION AND VENUE**

- 21 13. Legal argument requiring no response.
- 22 14. Legal argument requiring no response.

23 **PARTIES**

- 24 15. Legal argument requiring no response.
- 25 16. Admit the first sentence; the rest is a legal argument requiring no response.
- 26 17. After the United States filed its complaint, Adrian Fontes assumed the role
- 27 of Secretary of State of Arizona; the rest is legal argument requiring no re-
- 28 sponse.

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**LEGAL FRAMEWORK**

- 18. Legal argument requiring no response.
- 19. Legal argument requiring no response.
- 20. Intervenor lacks sufficient information to admit or deny.
- 21. The quoted statute speaks for itself.
- 22. Legal argument requiring no response.
- 23. Deny.
- 24. Legal argument requiring no response.
- 25. The quoted statute speaks for itself.

**FACTUAL ALLEGATIONS**

- 26. Intervenor lacks sufficient information to admit or deny.
- 27. Intervenor lacks sufficient information to admit or deny.
- 28. Intervenor lacks sufficient information to admit or deny.
- 29. Admit.
- 30. Legal argument requiring no response.
- 31. Legal argument requiring no response.
- 32. Legal argument requiring no response.
- 33. Legal argument requiring no response.
- 34. Legal argument requiring no response.
- 35. Legal argument requiring no response.
- 36. Legal argument requiring no response.
- 37. Legal argument requiring no response.
- 38. Legal argument requiring no response.
- 39. Legal argument requiring no response.
- 40. Legal argument requiring no response.
- 41. Intervenor lacks sufficient information to admit or deny.
- 42. The cited case speaks for itself.
- 43. The cited case speaks for itself.

- 1 44. The cited case speaks for itself.
- 2 45. Intervenor lacks sufficient information to admit or deny.
- 3 46. Intervenor lacks sufficient information to admit or deny.
- 4 47. Legal argument requiring no response.
- 5 48. The referenced statutes speak for themselves.
- 6 49. Legal argument requiring no response.
- 7 50. The quoted statute speaks for itself; the rest is a legal argument requiring no
- 8 response.
- 9 51. Deny.
- 10 52. Admit.
- 11 53. Deny.
- 12 54. Deny.
- 13 55. Deny.
- 14 56. Legal argument requiring no response.
- 15 57. The quoted statute speaks for itself.
- 16 58. Legal argument requiring no response.
- 17 59. Deny.
- 18 60. Deny.
- 19 61. Legal argument requiring no response.

20 **CLAIMS FOR RELIEF**

21 **Count 1: NVRA Section 6**

- 22 62. Intervenor incorporates by reference all foregoing responses to Plaintiffs'
- 23 allegations.
- 24 63. Legal argument requiring no response.
- 25 64. Legal argument requiring no response.
- 26 65. Legal argument requiring no response.
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**Count 2: Civil Rights Act of 1964 Section 101**

- 66. Intervenor incorporates by reference all foregoing responses to Plaintiff’s allegations.
- 67. Legal argument requiring no response.
- 68. Legal argument requiring no response.
- 69. Legal argument requiring no response.
- 70. Legal argument requiring no response.
- 71. Legal argument requiring no response.

**RESPONSE TO PRAYER FOR RELIEF**

Intervenor denies that Plaintiff is entitled to any relief.

**AFFIRMATIVE DEFENSES**

- 1. The allegations in the complaint fail to state a claim.
- 2. Plaintiff lacks a cause of action for one or more of its claims.
- 3. Plaintiff lacks standing for one or more of its claims.
- 4. Plaintiff’s requested relief is barred by the *Purcell* principle.

RESPECTFULLY SUBMITTED this 17th day of March, 2023.

By: /s/ Thomas Basile

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