

1 Tyler Green*
2 Cameron T. Norris*
3 James P. McGlone*
4 CONSOVOY MCCARTHY PLLC
5 1600 Wilson Blvd., Ste. 700
6 Arlington, VA 22209
7 (703) 243-9423
8 tyler@consovoymccarthy.com
9 cam@consovoymccarthy.com
10 jim@consovoymccarthy.com

11 Kory Langhofer, Ariz. Bar No. 024722
12 Thomas Basile, Ariz. Bar. No. 031150
13 STATECRAFT PLLC
14 649 North Fourth Avenue, First Floor
15 Phoenix, Arizona 85003
16 (602) 382-4078
17 kory@statecraftlaw.com
18 tom@statecraftlaw.com

19 *Attorneys for Intervenor-Defendant*
20 *admitted pro hac vice

21 **UNITED STATES DISTRICT COURT**
22 **DISTRICT OF ARIZONA**

23 Mi Familia Vota,
24 Plaintiff,
25 v.
26 Katie Hobbs, in her 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 AANHPI COMPLAINT**

AND CONSOLIDATED CASES

1 Pursuant to Federal Rule of Civil Procedure 8, Defendant-Intervenor Republican
2 National Committee (“RNC”) answers the complaint of Plaintiff Arizona Asian American
3 Native Hawaiian and Pacific Islander for Equity Coalition (the “Complaint”). Unless
4 expressly admitted below, every allegation in the Complaint is denied. When the RNC
5 says a factual allegation “speaks for itself,” it means it lacks sufficient information to admit
6 or deny the allegation; it does not admit that the referenced material exists, is accurate, is
7 relevant and admissible for the truth of the matter asserted or otherwise, or is placed in the
8 proper context. Subject to the foregoing, the RNC states as follows:

9 The first three paragraphs of the Complaint contain legal conclusions and
10 arguments to which no response is required. To the extent a response is deemed necessary,
11 the RNC denies the allegations in the first three paragraphs of the Complaint.

12 1. Paragraph 1 consists of legal conclusions and arguments to which no
13 response is required. To the extent a response is deemed necessary, the RNC denies the
14 allegations in paragraph 1.

15 2. The RNC admits that Arizona adopted Proposition 200 in 2004, the
16 provisions of which speak for themselves. The Supreme Court’s opinion in *Arizona v.*
17 *Inter Tribal Council of Ariz., Inc.*, 570 U.S.1 (2013), speaks for itself. The RNC denies
18 that H.B. 2492 or H.B. 2243 are inconsistent with *Inter Tribal Council* and deny any
19 remaining allegations in paragraph 2.

20 3. The RNC admits that Arizona petitions the Election Assistance Commission
21 to include certain state-specific instructions on the Federal Form, and answers that *Kobach*
22 *v. U.S. Election Assistance Comm’n*, 772 F. 3d 1183 (10th Cir. 2014), speaks for itself.
23 The RNC denies any remaining allegations in paragraph 3.

24 4. The RNC admits that Arizona implemented a bifurcated voter registration
25 system and that the consent decree in *LULAC v. Reagan*, No. 2:17-cv-04102-DGC, speaks
26 for itself. The RNC denies the remaining allegations in paragraph 4.

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1 5. The RNC admits that Arizona passed H.B. 2492 and denies the remaining
2 allegations in paragraph 5. Further answering, the RNC states that, according to Justice
3 Stevens’ lead opinion in *Crawford v. Marion County Election Board*, the “risk of voter
4 fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is
5 no question about the legitimacy or importance of the State’s interest” in combatting it.
6 553 U.S. 181, 196 (2008). And the Supreme Court has emphasized that “it should go
7 without saying that a State may take action to prevent election fraud without waiting for it
8 to occur and be detected within its own borders,” and that “[f]raud is a real risk that
9 accompanies mail-in voting.” *Brnovich v. Democratic Nat’l Comm.*, 141 S. Ct. 2321, 2348
10 (2021).

11 6. The provisions of H.B. 2492 and H.B. 2243 speak for themselves. The RNC
12 denies the remaining allegations in paragraph 6.

13 7. The RNC denies the allegations in paragraph 7.

14 8. The sources cited in paragraph 8 speak for themselves, and the RNC is
15 without knowledge or information sufficient to form a belief as to the truth or accuracy of
16 the information contained in those sources. The RNC denies the remaining allegations in
17 paragraph 8.

18 9. The sources cited in paragraph 8 speak for themselves, and the RNC is
19 without knowledge or information sufficient to form a belief as to the truth or accuracy of
20 the information contained in those sources. The RNC denies that H.B. 2492 was based on
21 a “pretext,” and denies the remaining allegations in paragraph 9.

22 10. The RNC admits that Governor Ducey had vetoed H.B. 2617 and signed
23 H.B. 2243 into law. The statements in the Governor’s veto message relating to H.B. 2617
24 speak for themselves. The RNC denies the remaining allegations in paragraph 10.

25 11. Paragraph 11 states legal conclusions to which no response is required. To
26 the extent a response is deemed necessary, the RNC denies the allegations in paragraph
27 11.

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1 12. The provisions of H.B. 2243 speak for themselves. The RNC denies the
2 remaining allegations in paragraph 12.

3 13. The provisions of H.B. 2243 speak for themselves. The RNC denies the
4 remaining allegations in paragraph 13.

5 14. The provisions of H.B. 2243 speak for themselves. The RNC denies the
6 remaining allegations in paragraph 14.

7 15. The tweets of a third party private organization cited in paragraph 15 speak
8 for themselves. The RNC denies that such tweets are relevant to any claim in this
9 proceeding, deny that there was any “improper intent” motivating H.B. 2243, and deny the
10 remaining allegations in paragraph 15.

11 16. The provisions of H.B. 2617 speak for themselves. The RNC denies the
12 remaining allegations in paragraph 16.

13 17. The provisions of H.B. 2243 speak for themselves. The RNC denies the
14 remaining allegations in paragraph 17.

15 18. The RNC denies the allegations in paragraph 18.

16 19. The effective dates of H.B. 2492 and H.B. 2243 speak for themselves. The
17 RNC denies the remaining allegations in paragraph 19.

18 20. The RNC is without knowledge or information sufficient to admit or deny
19 the Plaintiff’s allegations concerning its communications with various county recorders.
20 The RNC denies any remaining allegations in paragraph 20.

21 21. The RNC denies the allegations in paragraph 21 and deny that the Plaintiff
22 is entitled to any relief.

23 22. The RNC admits that Plaintiff purports to premise its claim on 42 U.S.C. §
24 1983, but denies the validity of any such claim.

25 23. Paragraph 23 states a legal conclusion to which no response is required.

26 24. Paragraph 24 states a legal conclusion to which no response is required.

27 25. Paragraph 25 states a legal conclusion to which no response is required.

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1 26. Paragraph 26 states a legal conclusion to which no response is required.

2 27. Paragraph 27 states a legal conclusion to which no response is required.

3 28. Paragraph 28 states a legal conclusion to which no response is required.

4 29. Paragraph 29 states a legal conclusion to which no response is required.

5 30. The RNC is without knowledge or information sufficient to admit or deny
6 the allegations in paragraph 30.

7 31. The RNC is without knowledge or information sufficient to admit or deny
8 the allegations in paragraph 31.

9 32. The RNC is without knowledge or information sufficient to admit or deny
10 the allegations in paragraph 32.

11 33. The RNC is without knowledge or information sufficient to admit or deny
12 the allegations in paragraph 33.

13 34. The RNC admits that Katie Hobbs was the Arizona Secretary of State at the
14 time the Complaint was filed. The remaining allegations in paragraph 34 state legal
15 conclusions to which no response is required.

16 35. The RNC admits that Mark Brnovich was the Arizona Attorney General at
17 the time the Complaint was filed. The remaining allegations in paragraph 35 state legal
18 conclusions to which no response is required.

19 36. Paragraph 36 states legal conclusions to which no response is required.

20 37. The RNC denies the allegations in paragraph 37.

21 38. The RNC is without knowledge or information sufficient to admit or deny
22 the allegations in paragraph 38, for which the Complaint cites no supporting sources.

23 39. The RNC is without knowledge or information sufficient to admit or deny
24 the allegations in paragraph 39, for which the Complaint cites no supporting sources.

25 40. The RNC admits that in 2004, Arizona voters adopted Proposition 200, the
26 provisions of which speak for themselves. The RNC denies any remaining allegations in
27 paragraph 40.

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1 41. The provisions of Proposition 200 and A.R.S. § 16-166(F) speak for
2 themselves.

3 42. The Supreme Court’s opinion in *Arizona v. Inter Tribal Council of Ariz.,*
4 *Inc.*, 570 U.S.1 (2013), speaks for itself.

5 43. Arizona Attorney General Opinion I-13-011 (Oct. 7, 2013) speaks for itself.

6 44. The RNC admits that Arizona implemented a “bifurcated” voter registration
7 system, pursuant to which individuals who registered with the Federal Form and did not
8 provide documentary proof of citizenship were eligible to vote only in elections for federal
9 office. The RNC denies any remaining allegations in paragraph 44.

10 45. The consent decree and pleadings in *LULAC v. Reagan*, 2:17-cv-04102-
11 DGC (June 18, 2018), speak for themselves.

12 46. The provisions of the *LULAC* consent decree speak for themselves.

13 47. The provisions of the *LULAC* consent decree speak for themselves. The
14 RNC is without knowledge or information sufficient to admit or deny the allegations in
15 paragraph 47 concerning whether or in what manner the consent decree was implemented.

16 48. The RNC admits the allegations in the first sentence of paragraph 48. The
17 statements of Representative Travis Grantham and other participants in the February 22,
18 2022 House Committee on Rules hearing speak for themselves. The news article cited in
19 support of the allegations in the final sentence of paragraph 48 speaks for itself, and the
20 RNC is without knowledge or information sufficient to form a belief as to the truth or
21 accuracy of the information contained in that article.

22 49. The RNC denies that H.B. 2492 or other unspecified voting laws “target[]
23 voters of color, but otherwise is without knowledge or information sufficient to admit or
24 deny the allegations in the first sentence of paragraph 49. The sources cited in support of
25 the remaining allegations in paragraph 49 speaks for themselves, and the RNC is without
26 knowledge or information sufficient to form a belief as to the truth or accuracy of the
27 information contained in such sources.

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1 50. The RNC is without knowledge or information sufficient to admit or deny
2 the allegations in the first sentence of paragraph 50. The statements of Senator Martin
3 Quezada and then-Secretary of State Katie Hobbs speak for themselves. The RNC denies
4 any remaining allegations in paragraph 50.

5 51. The RNC admits that Governor Ducey signed H.B. 2492 into law on March
6 30, 2022, but denies the remaining allegations in paragraph 51.

7 52. The contents of Governor Ducey’s signing letter speak for themselves.

8 53. The RNC is without knowledge or information sufficient to admit or deny
9 the allegations in the first sentence of paragraph 53, and further answering states that
10 according to Justice Stevens’ lead opinion in *Crawford v. Marion County Election Board*,
11 the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close
12 election,” and “[t]here is no question about the legitimacy or importance of the State’s
13 interest” in combatting it. 553 U.S. at 196. And the Supreme Court has emphasized that
14 “it should go without saying that a State may take action to prevent election fraud without
15 waiting for it to occur and be detected within its own borders,” and that “[f]raud is a real
16 risk that accompanies mail-in voting.” *Brnovich*, 141 S. Ct. at 2348. The news article cited
17 in footnote 20 speaks for itself. The RNC denies the remaining allegations in paragraph
18 53.

19 54. The contents of Governor Ducey’s signing letter and the Department of
20 Homeland Security data cited in paragraph 54 speak for themselves. The RNC denies the
21 remaining allegations in paragraph 54.

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1 55. The RNC is without knowledge or information sufficient to admit or deny
2 the allegations in the first sentence of paragraph 55, and further answering states that
3 according to Justice Stevens' lead opinion in *Crawford v. Marion County Election Board*,
4 the "risk of voter fraud" is "real," voter fraud "could affect the outcome of a close
5 election," and "[t]here is no question about the legitimacy or importance of the State's
6 interest" in combatting it. 553 U.S. at 196. And the Supreme Court has emphasized that
7 "it should go without saying that a State may take action to prevent election fraud without
8 waiting for it to occur and be detected within its own borders," and that "[f]raud is a real
9 risk that accompanies mail-in voting." *Brnovich*, 141 S. Ct. at 2348. The provisions of
10 H.B. 2492 speak for themselves, but the RNC denies that the information required of
11 registrants is "arbitrary and immaterial," and denies any remaining allegations in
12 paragraph 55.

13 56. The provisions of H.B. 2492 speak for themselves.

14 57. The RNC admits that H.B. 2617 was introduced on January 31, 2022. The
15 RNC is without knowledge or information sufficient to admit or deny the allegations in
16 the second sentence of paragraph 57. The statements made at the February 9, 2022 House
17 Committee on Government & Elections hearing speak for themselves. The RNC denies
18 any remaining allegations in paragraph 57.

19 58. The news article cited in footnote 25 speaks for itself, and the RNC is
20 without knowledge or information sufficient to form a belief as to the truth or accuracy of
21 the information contained in that article. The contents of Governor Ducey's veto message
22 speak for themselves. The RNC denies any remaining allegations in paragraph 58.

23 59. The RNC admits that H.B. 2243 was first read on January 18, 2022. The
24 provisions of H.B. 2243 in its introduced and amended forms, and the statement of the
25 bill's sponsor speak for themselves. The RNC denies any remaining allegations in
26 paragraph 59.

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1 60. The provisions of H.B. 2243 and H.B. 2617 (and all iterations of, and
2 amendments to, the same) speak for themselves.

3 61. The statement of Senator Quezada speaks for itself. The RNC denies the
4 remaining allegations in paragraph 61.

5 62. A.R.S. § 16-121.01(A) speaks for itself.

6 63. The provisions of H.B. 2492 speak for themselves. The RNC denies the
7 remaining allegations in paragraph 63.

8 64. A.R.S. § 16-166(F) speaks for itself.

9 65. Section 1 of H.B. 2492 speaks for itself.

10 66. Section 2 of H.B. 2492 speaks for itself.

11 67. Section 3 of H.B. 2492 speaks for itself.

12 68. Section 4 of H.B. 2492 speaks for itself.

13 69. A.R.S. § 16-121.01(D) speaks for itself.

14 70. A.R.S. § 16-121.01(E) speaks for itself.

15 71. Section 5 of H.B. 2492 speaks for itself.

16 72. Paragraph 72 states legal conclusions to which no response is required.

17 73. Paragraph 73 states legal conclusions to which no response is required. To
18 the extent a response is deemed necessary, the RNC denies that “H.B. 2492 seeks to purge
19 voters from federal election rolls in non-uniform and discriminatory ways,” and denies any
20 remaining allegations in paragraph 73.

21 74. Section 2 of H.B. 2492 speaks for itself.

22 75. Section 5 of H.B. 2492 speaks for itself.

23 76. A.R.S. § 16-123 speaks for itself.

24 77. Paragraph 77 states a legal conclusion to which no response is required.

25 78. Paragraph 78 states a legal conclusion to which no response is required.

26 79. Section 7 of H.B. 2492 speaks for itself.

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1 80. Paragraph 80 states a legal conclusion to which no response is required.
2 Further answering, the RNC is without knowledge or information sufficient to admit or
3 deny the allegation that county officials will use “potentially outdated and inaccurate
4 databases” in implementing H.B. 2492, for which the Complaint cites no supporting
5 source.

6 81. The provisions of H.B. 2492 and A.R.S. § 16-127 speak for themselves.

7 82. The provisions of H.B. 2492 and A.R.S. § 16-165(A)(10) speak for
8 themselves.

9 83. Paragraph 83 states legal conclusions to which no response is required. The
10 RNC denies any remaining allegations in paragraph 83.

11 84. The provisions of H.B. 2243 and A.R.S. § 16-165(A)(10) speak for
12 themselves.

13 85. The provisions of H.B. 2243 and A.R.S. § 16-165(H) speak for themselves.

14 86. Paragraph 86 states legal conclusions to which no response is required. The
15 RNC denies any remaining allegations in paragraph 86.

16 87. Paragraph 87 states legal conclusions to which no response is required. The
17 RNC denies that U.S. citizens who were born outside the United States will have their
18 citizenship status subject “to constant suspicion and investigation,” and denies any
19 remaining allegations in paragraph 87.

20 88. The RNC denies the allegations in paragraph 88.

21 89. The cited advisory memorandum to the U.S. Commission on Civil Rights
22 speaks for itself. The RNC denies the remaining allegations in paragraph 89.

23 90. The RNC denies the allegations in paragraph 90.

24 91. The RNC is without knowledge or information sufficient to admit or deny
25 the allegations concerning the volume and ethnic composition of naturalized citizens in
26 Arizona, for which the Complaint cites no supporting sources. The RNC denies the
27 remaining allegations in paragraph 91.

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1 92. The RNC is without knowledge or information sufficient to admit or deny
2 the allegations in the first two sentences of paragraph 92. The RNC denies the remaining
3 allegations in paragraph 92.

4 93. The sources cited in paragraph 93 speak for themselves. The RNC denies
5 the allegations in the final two sentences of paragraph 93.

6 94. The provisions of H.B. 2492 and the statements of Senator Lupe Contreras
7 and Greg Blackie speak for themselves. The RNC denies the remaining allegations in
8 paragraph 94.

9 95. The provisions of H.B. 2492 speak for themselves. The RNC denies the
10 remaining allegations in paragraph 95 and footnote 42.

11 96. The RNC denies the allegations in paragraph 96.

12 97. The RNC admits the allegations in the first sentence of paragraph 97 but
13 denies the remaining allegations in paragraph 97.

14 98. The RNC denies the allegations in paragraph 98.

15 99. The RNC is without knowledge or information sufficient to admit or deny
16 the allegations in paragraph 99.

17 100. The RNC realleges and incorporates by reference its responses to the
18 foregoing paragraphs.

19 101. The RNC denies that “H.B. 2492 and H.B. 2243 will remove more and more
20 AANHPI voters, many of whom are naturalized citizens, from one or more elections.” The
21 RNC is without knowledge or information sufficient to admit or deny the remaining
22 allegations in paragraph 101.

23 102. The RNC is without knowledge or information sufficient to admit or deny
24 the allegations in paragraph 102.

25 103. The RNC denies that H.B. 2492 or H.B. 2243 “disenfranchise” any eligible
26 registrant. The RNC is without knowledge or information sufficient to admit or deny the
27 remaining allegations in paragraph 103.

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1 104. The RNC denies that H.B. 2492 “will have a chilling effect” on eligible
2 individuals who wish to register to vote. The RNC is without knowledge or information
3 sufficient to admit or deny the remaining allegations in paragraph 104.

4 105. The RNC denies that H.B. 2492 will result in the “purging” of lawful voters.
5 The RNC is without knowledge or information sufficient to admit or deny the remaining
6 allegations in paragraph 105.

7 106. The RNC is without knowledge or information sufficient to admit or deny
8 the allegations in paragraph 106.

9 107. The RNC is without knowledge or information sufficient to admit or deny
10 the allegations in paragraph 107.

11 108. The RNC is without knowledge or information sufficient to admit or deny
12 the allegations in paragraph 108.

13 109. The RNC denies that H.B. 2492 and H.B. 2243 “have caused and will
14 continue to cause a direct injury by lowering voter registration.” The RNC is without
15 knowledge or information sufficient to admit or deny the remaining allegations in
16 paragraph 109.

17 110. The RNC is without knowledge or information sufficient to admit or deny
18 the allegations in paragraph 110.

19 111. The allegations in the second and third sentences of paragraph 111 state legal
20 conclusions to which no response is required. The RNC is without knowledge or
21 information sufficient to admit or deny the remaining allegations in paragraph 111.

22 112. The RNC denies the allegations in paragraph 112 that H.B. 2492 and H.B.
23 2243 will have a “chilling effect” on eligible individuals who wish to register to vote and
24 that the databases identified in A.R.S. §§ 16-143(B) and 16-165 are likely to contain
25 outdated information. The RNC is without knowledge or information sufficient to admit
26 or deny the remaining allegations in paragraph 112.

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1 113. The RNC realleges and incorporates by reference its responses to the
2 foregoing paragraphs.

3 114. Paragraph 114 states legal conclusions to which no response is required.

4 115. Paragraph 115 states legal conclusions to which no response is required.
5 *Anderson v. Celebrezze*, 460 U.S. 780 (1983), and *Burdick v. Takushi*, 504 U.S. 428
6 (1992), speak for themselves.

7 116. The RNC denies the allegations in paragraph 116.

8 117. The RNC denies the allegations in paragraph 117.

9 118. The RNC denies the allegations in paragraph 118.

10 119. The RNC realleges and incorporates by reference in responses to the
11 foregoing paragraphs.

12 120. Paragraph 120 states a legal conclusion to which no response is required.
13 The text of the Fourteenth Amendment and *City of Cleburne v. Cleburn Living Ctr.*, 473
14 U.S. 432 (1985), speak for themselves.

15 121. Paragraph 121 states a legal conclusion to which no response is required.
16 *Dunn v. Blumstein*, 405 U.S. 330 (1972), and *Harper v. Va State Bd. Of Elections*, 383
17 U.S. 663 (1966), speak for themselves.

18 122. The RNC denies the allegations in paragraph 122.

19 123. The RNC denies the allegations in paragraph 123.

20 124. The RNC denies the allegations in paragraph 124.

21 125. The RNC realleges and incorporates by reference its responses to the
22 foregoing paragraphs.

23 126. Paragraph 126 states legal conclusions to which no response is required. The
24 text of the Fourteenth Amendment speaks for itself.

25 127. Paragraph 127 states legal conclusions to which no response is required.
26 *Village of Arlington Heights v. Metropolitan Housing Development Corp.*, 429 U.S. 252
27 (1977), speaks for itself.

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1 128. The RNC denies the allegations in paragraph 128.

2 129. The RNC denies the allegations in paragraph 129.

3 130. The RNC denies the allegations in paragraph 130.

4 131. The RNC denies the allegations in paragraph 131.

5 132. The RNC denies the allegations in paragraph 132.

6 133. The RNC denies the allegations in paragraph 133.

7 134. The RNC realleges and incorporates by reference its responses to the
8 foregoing paragraphs.

9 135. The text of the Fourteenth Amendment speaks for itself.

10 136. The first three sentences of paragraph 136 state legal conclusions to which
11 no response is required. The RNC denies the allegations in the final sentence of paragraph
12 136 and any remaining allegations in paragraph 136.

13 137. The RNC denies the allegations in paragraph 137.

14 138. The RNC denies the allegations in paragraph 138.

15 139. The RNC denies the allegations in paragraph 139.

16 140. The RNC denies the allegations in paragraph 140.

17 141. The RNC denies the allegations in paragraph 141.

18 142. The RNC denies the allegations in paragraph 142.

19 143. The RNC realleges and incorporates by reference its responses to the
20 foregoing paragraphs.

21 144. The text of the Fourteenth Amendment speaks for itself.

22 145. The text of the Fifteenth Amendment, *Rice v. Cayetano*, 528 U.S. 495
23 (2000), and *Terry v. Adams*, 345 U.S. 461 (1953), speak for themselves.

24 146. Paragraph 146 states legal conclusions to which no response is required.
25 *Village of Arlington Heights v. Metropolitan Housing Development Corp.*, 429 U.S. 252
26 (1977), speaks for itself.

27 147. The RNC denies the allegations in paragraph 147.

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1 148. The RNC denies the allegations in paragraph 148.

2 149. The RNC denies the allegations in paragraph 149.

3 150. The RNC denies the allegations in paragraph 150.

4 151. The RNC denies the allegations in paragraph 151.

5 152. The RNC realleges and incorporates by reference its responses to the
6 foregoing paragraphs.

7 153. 52 U.S.C. § 10101(a)(2)(B) speaks for itself.

8 154. The RNC denies the allegations in paragraph 154.

9 155. The RNC denies the allegations in paragraph 155.

10 156. The RNC realleges and incorporates by reference its responses to the
11 foregoing paragraphs.

12 157. Appendix 1 to the Complaint speaks for itself.

13 158. The RNC is without knowledge or information sufficient to admit or deny
14 the allegations in the first sentence of paragraph 158 or allegations concerning Plaintiff's
15 intentions to amend or supplement the Complaint. The RNC denies the remaining
16 allegations in paragraph 158.

17 159. The provisions of 52 U.S.C. § 20504 speak for themselves.

18 160. 52 U.S.C. § 20505(a)(1) and 52 U.S.C. § 20508(b)(2) speak for themselves.

19 161. 52 U.S.C. § 20507(b)(1) speaks for itself. The RNC denies the remaining
20 allegations in paragraph 161.

21 162. The provisions of 52 U.S.C. § 20507 speak for themselves.

22 163. 52 U.S.C. § 20507(c)(2)(A) speaks for itself.

23 164. The RNC denies the allegations in paragraph 164.

24 165. The RNC denies the allegations in paragraph 165.

25 166. The RNC denies the allegations in paragraph 166.

26 167. The RNC denies the allegations in paragraph 167.

27 168. The RNC denies the allegations in paragraph 168.

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1 169. The RNC denies the allegations in paragraph 169.

2 170. The RNC denies the allegations in paragraph 170.

3 171. The provisions of H.B. 2243 speak for themselves. The RNC denies that
4 “H.B. 2243 violates Section 8 of the NVRA by systematically removing voters from voter
5 rolls within 90 days of a federal election,” and denies the remaining allegations in
6 paragraph 171.

7 172. The RNC denies the allegations in paragraph 172.

8 173. The RNC denies the allegations in paragraph 173.

9 174. The RNC denies the allegations in paragraph 174.

10 **RESPONSE TO PRAYER FOR RELIEF**

11 The RNC denies that the Plaintiff is entitled to any of the relief requested.

12 **AFFIRMATIVE DEFENSES**

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

17
18 RESPECTFULLY SUBMITTED this 17th day of March, 2023.

19 Tyler Green*
20 Cameron T. Norris*
21 James P. McGlone*
22 CONSOVOY MCCARTHY PLLC
23 1600 Wilson Blvd., Ste. 700
24 Arlington, VA 22209
25 (703) 243-9423
tyler@consovoymccarthy.com
cam@consovoymccarthy.com
jim@consovoymccarthy.com

By: /s/ Thomas Basile
Kory Langhofer, Ariz. Bar No. 024722
Thomas Basile, Ariz. Bar. No. 031150
STATECRAFT PLLC
649 North Fourth Avenue, First Floor
Phoenix, Arizona 85003
(602) 382-4078
kory@statecraftlaw.com
tom@statecraftlaw.com

26 *admitted pro hac vice

27 *Attorneys for Intervenor-Defendant*