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 13 *Attorney General Kristin K. Mayes*

14 UNITED STATES DISTRICT COURT
 15 DISTRICT OF ARIZONA

16 Mi Familia Vota, et al.,
 17 Plaintiffs,
 18 v.
 19 Adrian Fontes, et al.,
 20 Defendants.

No. CV-22-00509-PHX-SRB (Lead)

**DEFENDANT ATTORNEY
 GENERAL KRISTIN K. MAYES'S
 ANSWER TO COMPLAINT FOR
 DECLARATORY AND INJUNCTIVE
 RELIEF FILED BY PROMISE
 ARIZONA PLAINTIFFS**

21
 22 THIS DOCUMENT RELATES TO:

No. CV-22-01602-PHX-SRB

23
 24 Defendant Attorney General Kristin K. Mayes (the "Attorney General") answers the
 25 Complaint filed by Plaintiffs Promise Arizona and Southwest Voter Registration Education
 26 Project (collectively, "Plaintiffs") on September 20, 2022 in Case No. CV-22-01602-PHX-
 27 SRB as follows:
 28

INTRODUCTION

1
2 1. The Attorney General admits that Plaintiffs generally describe the nature of
3 their claims in this action. The Attorney General denies any remaining allegations in
4 Paragraph 1.

5 2. The Attorney General lacks sufficient information to admit or deny the
6 allegations in Paragraph 2 and therefore denies the same.

7 3. This paragraph includes legal conclusions that require no response. The
8 Attorney General alleges that HB 2243 speaks for itself and is accurately quoted, and further
9 denies any allegations contained in this paragraph that are inconsistent with or otherwise
10 mischaracterize HB 2243. The Attorney General lacks information to admit or deny all
11 remaining allegations in Paragraph 3 and therefore denies the same.

12 4. This paragraph includes legal conclusions that require no response. If a
13 response is required, the Attorney General lacks information to admit or deny the
14 allegations in Paragraph 4 and therefore denies the same.

15 5. The Attorney General lacks sufficient information to admit or deny the
16 allegations in Paragraph 5 and therefore denies the same.

17 6. Deny.

18 7. Deny.

JURISDICTION AND VENUE

19
20 8. The Attorney General admits that the Court has subject matter jurisdiction.

21 9. The Attorney General admits that the Court has subject matter jurisdiction.

22 10. The Attorney General admits that the Court has subject matter jurisdiction.

23 11. The Attorney General admits that the Court has subject matter jurisdiction.

24 12. Admit.

25 13. Admit.

26 14. Admit.

27 15. Admit.

28 16. Admit.

PARTIES

1
2 17. The Attorney General lacks sufficient information to admit or deny the
3 allegations in Paragraph 17 and therefore denies the same.

4 18. The Attorney General lacks sufficient information to admit or deny the
5 allegations in Paragraph 18 and therefore denies the same.

6 19. This paragraph includes legal conclusions that require no response. To the
7 extent a response is required, the Attorney General admits that the Secretary of State is the
8 “chief election officer of the State of Arizona” and is responsible for certain implementation
9 of H.B. 2243, but the Attorney General lacks sufficient information to admit or deny the
10 remaining allegations in Paragraph 19 and therefore denies the same.

11 20. This paragraph includes legal conclusions that require no response. To the
12 extent a response is required, the Attorney General admits that the Attorney General is “the
13 chief legal officer of the State of Arizona” and has statutory authority related to H.B. 2243,
14 but the Attorney General lacks sufficient information to admit or deny the remaining
15 allegations in Paragraph 20 and therefore denies the same.

16 21. This paragraph includes legal conclusions that require no response. To the
17 extent a response is required, the Attorney General lacks sufficient information to admit or
18 deny the allegations in Paragraph 21 and therefore denies the same.

19 22. This paragraph includes legal conclusions that require no response. To the
20 extent a response is required, the Attorney General lacks sufficient information to admit or
21 deny the allegations in Paragraph 22 and therefore denies the same.

22 **STATEMENT OF FACTS**

23 **Introduction**

24 23. This paragraph includes legal conclusions that require no response. To the
25 extent a response is required, the Attorney General lacks sufficient information to admit or
26 deny the allegations in Paragraph 23 and therefore denies the same.

27 24. This paragraph includes legal conclusions that require no response. To the
28 extent a response is required, the Attorney General lacks sufficient information to admit or

1 deny the allegations in Paragraph 24 and therefore denies the same.

2 25. The Attorney General lacks sufficient information to admit or deny the
3 allegations in Paragraph 25 and therefore denies the same.

4 26. The Attorney General lacks sufficient information to admit or deny the
5 allegations in Paragraph 26 and therefore denies the same.

6 27. The Attorney General lacks sufficient information to admit or deny the
7 allegations in Paragraph 27 and therefore denies the same.

8 28. The Attorney General lacks sufficient information to admit or deny the
9 allegations in Paragraph 28 and therefore denies the same.

10 29. The Attorney General lacks sufficient information to admit or deny the
11 allegations in Paragraph 29 and therefore denies the same.

12 30. The Attorney General lacks sufficient information to admit or deny the
13 allegations in Paragraph 30 and therefore denies the same.

14 31. The Attorney General lacks sufficient information to admit or deny the
15 allegations in Paragraph 31 and therefore denies the same.

16 32. The Attorney General lacks sufficient information to admit or deny the
17 allegations in Paragraph 32 and therefore denies the same.

18 **Arizona House Bill 2617**

19 33. This paragraph includes legal conclusions that require no response. To the
20 extent a response is required, the Attorney General lacks sufficient information to admit or
21 deny the allegations in Paragraph 33 and therefore denies the same.

22 34. This paragraph includes legal conclusions that require no response. The
23 Attorney General alleges that HB 2617 speaks for itself and is accurately quoted, and further
24 denies any allegations contained in this paragraph that are inconsistent with or otherwise
25 mischaracterize HB 2617. The Attorney General lacks information to admit or deny any
26 remaining allegations in Paragraph 34 and therefore denies the same.

27 35. The Attorney General lacks sufficient information to admit or deny the
28 allegations in Paragraph 35 and therefore denies the same.

1 36. The Attorney General admits the Governor Ducey vetoed H.B. 2617, but she
2 alleges that the letter referenced speaks for itself and further denies any allegations
3 contained in this paragraph that are inconsistent with or otherwise mischaracterize the letter.
4 The Attorney General lacks sufficient information to admit or deny all remaining
5 allegations in Paragraph 36 and therefore denies the same.

6 37. The Attorney General alleges that the letter referenced speaks for itself and
7 further denies any allegations contained in this paragraph that are inconsistent with or
8 otherwise mischaracterize the letter. The Attorney General lacks sufficient information to
9 admit or deny all remaining allegations in Paragraph 37 and therefore denies the same.

10 38. The Attorney General alleges that the letter referenced speaks for itself and
11 further denies any allegations contained in this paragraph that are inconsistent with or
12 otherwise mischaracterize the letter. The Attorney General lacks sufficient information to
13 admit or deny all remaining allegations in Paragraph 38 and therefore denies the same.

14 **Arizona House Bill 2243**

15 39. The Attorney General admits that the Arizona Legislature amended H.B.
16 2243, but she lacks sufficient information to admit or deny any remaining allegations in
17 Paragraph 39 and therefore denies the same.

18 40. The Attorney General lacks sufficient information to admit or deny the
19 allegations in Paragraph 40 and therefore denies the same.

20 41. The Attorney General lacks sufficient information to admit or deny the
21 allegations in Paragraph 41 and therefore denies the same.

22 42. This paragraph includes legal conclusions that require no response. To the
23 extent a response is required, the Attorney General lacks sufficient information to admit or
24 deny the allegations in Paragraph 42 and therefore denies the same.

25 43. The Attorney General lacks sufficient information to admit or deny the
26 allegations in Paragraph 43 and therefore denies the same.

27 44. The Attorney General lacks sufficient information to admit or deny the
28 allegations in Paragraph 44 and therefore denies the same.

1 45. This paragraph includes legal conclusions that require no response. To the
2 extent a response is required, the Attorney General admits that “Governor Ducey signed
3 H.B. 2243 into law,” but she lacks sufficient information to admit or deny any remaining
4 allegations in Paragraph 45 and therefore denies the same.

5 46. This paragraph includes legal conclusions that require no response. To the
6 extent a response is required, the Attorney General lacks sufficient information to admit or
7 deny any remaining allegations in Paragraph 46 and therefore denies the same.

8 47. The Attorney General lacks sufficient information to admit or deny the
9 allegations in Paragraph 47 and therefore denies the same.

10 48. Deny.

11 49. The Attorney General lacks sufficient information to admit or deny the
12 allegations in Paragraph 49 and therefore denies the same.

13 50. The Attorney General denies that H.B. 2243 violates federal law and lacks
14 sufficient information to admit or deny the remaining allegations in Paragraph 50 and
15 therefore denies the same.

16 **Residency Requirements**

17 51. The Attorney General lacks sufficient information to admit or deny the
18 allegations in Paragraph 51 and therefore denies the same.

19 52. This paragraph includes legal conclusions that require no response because
20 the language of A.R.S. § 16-101 speaks for itself. To the extent a response is required, the
21 Attorney General lacks sufficient information to admit or deny the allegations in Paragraph
22 52 and therefore denies the same.

23 53. This paragraph includes legal conclusions that require no response because
24 the language of A.R.S. § 16-152 speaks for itself. To the extent a response is required, the
25 Attorney General lacks sufficient information to admit or deny the allegations in Paragraph
26 53 and therefore denies the same.

27 **Causes of Cancellation**

28 54. This paragraph includes legal conclusions that require no response. To the

1 extent a response is required, the Attorney General lacks sufficient information to admit or
2 deny the allegations in Paragraph 54 and therefore denies the same.

3 55. This paragraph includes legal conclusions that require no response. To the
4 extent a response is required, the Attorney General lacks sufficient information to admit or
5 deny the allegations in Paragraph 55 and therefore denies the same.

6 56. This paragraph includes legal conclusions that require no response. The
7 Attorney General alleges that HB 2243 speaks for itself and is accurately quoted, and further
8 denies any allegations contained in this paragraph that are inconsistent with or otherwise
9 mischaracterize HB 2243. The Attorney General lacks information to admit or deny all
10 remaining allegations in Paragraph 56 and therefore denies the same.

11 57. This paragraph includes legal conclusions that require no response. The
12 Attorney General alleges that HB 2243 speaks for itself and is accurately quoted, and further
13 denies any allegations contained in this paragraph that are inconsistent with or otherwise
14 mischaracterize HB 2243. The Attorney General lacks information to admit or deny all
15 remaining allegations in Paragraph 57 and therefore denies the same.

16 58. This paragraph includes legal conclusions that require no response. The
17 Attorney General alleges that HB 2243 speaks for itself and is accurately quoted, and further
18 denies any allegations contained in this paragraph that are inconsistent with or otherwise
19 mischaracterize HB 2243. The Attorney General lacks information to admit or deny all
20 remaining allegations in Paragraph 58 and therefore denies the same.

21 59. This paragraph includes legal conclusions that require no response. The
22 Attorney General alleges that HB 2243 speaks for itself and is accurately quoted, and further
23 denies any allegations contained in this paragraph that are inconsistent with or otherwise
24 mischaracterize HB 2243. The Attorney General lacks information to admit or deny all
25 remaining allegations in Paragraph 59 and therefore denies the same.

26 60. This paragraph includes legal conclusions that require no response. The
27 Attorney General alleges that HB 2243 speaks for itself and is accurately quoted, and further
28 denies any allegations contained in this paragraph that are inconsistent with or otherwise

1 mischaracterize HB 2243. The Attorney General lacks information to admit or deny all
2 remaining allegations in Paragraph 60 and therefore denies the same.

3 61. This paragraph includes legal conclusions that require no response. The
4 Attorney General alleges that HB 2243 speaks for itself and further denies any allegations
5 contained in this paragraph that are inconsistent with or otherwise mischaracterize HB 2243.
6 The Attorney General lacks information to admit or deny all remaining allegations in
7 Paragraph 61 and therefore denies the same.

8 **Effects of Registration Cancellations and Voter Purges**

9 62. Deny.

10 63. The Attorney General lacks sufficient information to admit or deny the
11 allegations in Paragraph 63 and therefore denies the same.

12 64. The Attorney General lacks sufficient information to admit or deny the
13 allegations in Paragraph 64 and therefore denies the same.

14 65. The Attorney General lacks sufficient information to admit or deny the
15 allegations in Paragraph 65 and therefore denies the same.

16 66. This paragraph includes legal conclusions that require no response. To the
17 extent a response is required, the Attorney General lacks sufficient information to admit or
18 deny the allegations in Paragraph 66 and therefore denies the same.

19 67. This paragraph includes legal conclusions that require no response. To the
20 extent a response is required, the Attorney General lacks sufficient information to admit or
21 deny the allegations in Paragraph 67 and therefore denies the same.

22 68. This paragraph includes legal conclusions that require no response. To the
23 extent a response is required, the Attorney General lacks sufficient information to admit or
24 deny the allegations in Paragraph 68 and therefore denies the same.

25 69. This paragraph includes legal conclusions that require no response. To the
26 extent a response is required, the Attorney General lacks sufficient information to admit or
27 deny the allegations in Paragraph 69 and therefore denies the same.

28 70. This paragraph includes legal conclusions that require no response. To the

1 extent a response is required, the Attorney General lacks sufficient information to admit or
2 deny the allegations in Paragraph 70 and therefore denies the same.

3 71. This paragraph includes legal conclusions that require no response. The
4 Attorney General alleges that HB 2243 speaks for itself and is accurately quoted, and further
5 denies any allegations contained in this paragraph that are inconsistent with or otherwise
6 mischaracterize HB 2243. The Attorney General lacks information to admit or deny all
7 remaining allegations in Paragraph 71 and therefore denies the same.

8 72. The Attorney General lacks sufficient information to admit or deny the
9 allegations in Paragraph 72 and therefore denies the same.

10 73. The Attorney General lacks sufficient information to admit or deny the
11 allegations in Paragraph 73 and therefore denies the same.

12 74. The Attorney General lacks sufficient information to admit or deny the
13 allegations in Paragraph 74 and therefore denies the same.

14 75. This paragraph includes legal conclusions that require no response. To the
15 extent a response is required, the Attorney General lacks sufficient information to admit or
16 deny the allegations in Paragraph 75 and therefore denies the same.

17 76. This paragraph includes legal conclusions that require no response. To the
18 extent a response is required, the Attorney General denies that HB 2243 discriminates based
19 on race and national origin and lacks sufficient information to admit or deny the remaining
20 allegations in Paragraph 76 and therefore denies the same.

21 77. This paragraph includes legal conclusions that require no response. To the
22 extent a response is required, the Attorney General lacks sufficient information to admit or
23 deny the allegations in Paragraph 77 and therefore denies the same.

24 78. This paragraph includes legal conclusions that require no response. To the
25 extent a response is required, the Attorney General lacks sufficient information to admit or
26 deny the allegations in Paragraph 78 and therefore denies the same.

27 79. This paragraph includes legal conclusions that require no response. To the
28 extent a response is required, the Attorney General denies that HB 2243 violates federal law

1 and lacks sufficient information to admit or deny the remaining allegations in Paragraph 79
2 and therefore denies the same.

3 80. The Attorney General lacks sufficient information to admit or deny the
4 allegations in Paragraph 80 and therefore denies the same.

5 81. The Attorney General lacks sufficient information to admit or deny the
6 allegations in Paragraph 81 and therefore denies the same.

7 82. The Attorney General lacks sufficient information to admit or deny the
8 allegations in Paragraph 82 and therefore denies the same.

9 83. The Attorney General lacks sufficient information to admit or deny the
10 allegations in Paragraph 83 and therefore denies the same.

11 84. The Attorney General lacks sufficient information to admit or deny the
12 allegations in Paragraph 84 and therefore denies the same.

13 85. The Attorney General lacks sufficient information to admit or deny the
14 allegations in Paragraph 85 and therefore denies the same.

15 86. The Attorney General lacks sufficient information to admit or deny the
16 allegations in Paragraph 86 and therefore denies the same.

17 87. The Attorney General lacks sufficient information to admit or deny the
18 allegations in Paragraph 87 and therefore denies the same.

19 **FIRST CAUSE OF ACTION**

20 **Violation of the First and Fourteenth Amendments**
21 **U.S. Const. Amend., I and XIV; 42 U.S.C. § 1983**
(Undue Burden on the Right to Vote)

22 88. The Attorney General incorporates by reference all preceding paragraphs as
23 if fully set forth herein.

24 89. This paragraph includes legal conclusions that require no response. To the
25 extent a response is required, the Attorney General denies the allegations in Paragraph 89.

26 90. This paragraph includes legal conclusions that require no response. To the
27 extent a response is required, the Attorney General admits the quoted language is accurately
28 reproduced.

1 91. This paragraph includes legal conclusions that require no response. To the
2 extent a response is required, the Attorney General admits the quoted language is accurately
3 reproduced, but she lacks sufficient information to admit or deny any remaining allegations
4 in Paragraph 91 and therefore denies the same.

5 92. This paragraph includes legal conclusions that require no response. To the
6 extent a response is required, the Attorney General admits the quoted language is accurately
7 reproduced, but she lacks sufficient information to admit or deny any remaining allegations
8 in Paragraph 92 and therefore denies the same.

9 93. This paragraph includes legal conclusions that require no response. To the
10 extent a response is required, the Attorney General admits the quoted language is accurately
11 reproduced.

12 94. This paragraph includes legal conclusions that require no response. To the
13 extent a response is required, the Attorney General admits the quoted language is accurately
14 reproduced, but she lacks sufficient information to admit or deny any remaining allegations
15 in Paragraph 94 and therefore denies the same.

16 95. This paragraph includes legal conclusions that require no response. To the
17 extent a response is required, the Attorney General admits the quoted language is accurately
18 reproduced, but she lacks sufficient information to admit or deny any remaining allegations
19 in Paragraph 95 and therefore denies the same.

20 96. This paragraph includes legal conclusions that require no response. To the
21 extent a response is required, the Attorney General admits the quoted language is accurately
22 reproduced, but she lacks sufficient information to admit or deny any remaining allegations
23 in Paragraph 96 and therefore denies the same.

24 97. Deny.

25 98. The Attorney General admits that Plaintiffs generally describe the nature of
26 their claims in this action.

27 99. Deny.

28 100. The Attorney General lacks sufficient information to admit or deny the

1 allegations in Paragraph 100 and therefore denies the same.

2 101. Deny.

3 102. The Attorney General lacks sufficient information to admit or deny the
4 allegations in Paragraph 102 and therefore denies the same.

5 103. The Attorney General lacks sufficient information to admit or deny the
6 allegations in Paragraph 103 and therefore denies the same.

7 104. Deny.

8 **SECOND CAUSE OF ACTION**

9 **Violation of the Fourteenth Amendment**
10 **U.S. Const. Amend., XIV; 42 U.S.C. § 1983**
11 **(Race or National Origin Discrimination)**

12 105. The Attorney General incorporates by reference all preceding paragraphs as
13 if fully set forth herein.

14 106. This paragraph includes legal conclusions that require no response. To the
15 extent a response is required, the Attorney General lacks sufficient information to admit or
16 deny the allegations in Paragraph 106 and therefore denies the same.

17 107. This paragraph includes legal conclusions that require no response. To the
18 extent a response is required, the Attorney General admits the quoted language is accurately
19 reproduced.

20 108. This paragraph includes legal conclusions that require no response. To the
21 extent a response is required, the Attorney General lacks sufficient information to admit or
22 deny the allegations in Paragraph 108 and therefore denies the same.

23 109. This paragraph includes legal conclusions that require no response. To the
24 extent a response is required, the Attorney General admits the quoted language is accurately
25 reproduced, but she lacks sufficient information to admit or deny any remaining allegations
26 in Paragraph 109 and therefore denies the same.

27 110. This paragraph includes legal conclusions that require no response. To the
28 extent a response is required, the Attorney General lacks sufficient information to admit or
deny the allegations in Paragraph 110 and therefore denies the same.

1 111. This paragraph includes legal conclusions that require no response. To the
2 extent a response is required, the Attorney General lacks sufficient information to admit or
3 deny the allegations in Paragraph 111 and therefore denies the same.

4 112. Deny.

5 113. Deny.

6 114. The Attorney General lacks sufficient information to admit or deny the
7 allegations in Paragraph 114 and therefore denies the same.

8 115. The Attorney General lacks sufficient information to admit or deny the
9 allegations in Paragraph 115 and therefore denies the same.

10 116. The Attorney General lacks sufficient information to admit or deny the
11 allegations in Paragraph 116 and therefore denies the same.

12 117. The Attorney General lacks sufficient information to admit or deny the
13 allegations in Paragraph 117 and therefore denies the same.

14 118. Deny.

15 119. The Attorney General lacks sufficient information to admit or deny the
16 allegations in Paragraph 119 and therefore denies the same.

17 120. The Attorney General lacks sufficient information to admit or deny the
18 allegations in Paragraph 120 and therefore denies the same.

19 121. Deny.

20 122. Deny.

21 **THIRD CAUSE OF ACTION**

22 **Violation of the Fourteenth Amendment**
23 **U.S. Const. Amend., XIV; 42 U.S.C. § 1983**
(National Origin or Alienage Discrimination)

24 123. The Attorney General incorporates by reference all preceding paragraphs as
25 if fully set forth herein.

26 124. This paragraph includes legal conclusions that require no response. To the
27 extent a response is required, the Attorney General lacks sufficient information to admit or
28 deny the allegations in Paragraph 124 and therefore denies the same.

1 125. This paragraph includes legal conclusions that require no response. To the
2 extent a response is required, the Attorney General admits the quoted language is accurately
3 reproduced.

4 126. This paragraph includes legal conclusions that require no response. To the
5 extent a response is required, the Attorney General admits the quoted language is accurately
6 reproduced.

7 127. This paragraph includes legal conclusions that require no response. To the
8 extent a response is required, the Attorney General admits the quoted language is accurately
9 reproduced, but she lacks sufficient information to admit or deny any remaining allegations
10 in Paragraph 127 and therefore denies the same.

11 128. This paragraph includes legal conclusions that require no response. To the
12 extent a response is required, the Attorney General admits the quoted language is accurately
13 reproduced.

14 129. Deny.

15 130. Deny.

16 131. This paragraph includes legal conclusions that require no response. To the
17 extent a response is required, the Attorney General lacks sufficient information to admit or
18 deny any remaining allegations in Paragraph 131 and therefore denies the same.

19 132. This paragraph includes legal conclusions that require no response. To the
20 extent a response is required, the Attorney General lacks sufficient information to admit or
21 deny any remaining allegations in Paragraph 132 and therefore denies the same.

22 133. This paragraph includes legal conclusions that require no response. To the
23 extent a response is required, the Attorney General lacks sufficient information to admit or
24 deny any remaining allegations in Paragraph 133 and therefore denies the same.

25 134. This paragraph includes legal conclusions that require no response. To the
26 extent a response is required, the Attorney General lacks sufficient information to admit or
27 deny any remaining allegations in Paragraph 134 and therefore denies the same.

28 135. Deny.

1 136. Deny.

2 **FOURTH CAUSE OF ACTION**

3 **Violation of the Fourteenth Amendment**
4 **U.S. Const. Amend., XIV; 42 U.S.C. § 1983**
5 **(Void for Vagueness; Denial of Due Process)**

6 137. The Attorney General incorporates by reference all preceding paragraphs as
7 if fully set forth herein.

8 138. This paragraph includes legal conclusions that require no response. To the
9 extent a response is required, the Attorney General admits the quoted language is accurately
10 reproduced, but she lacks sufficient information to admit or deny any remaining allegations
11 in Paragraph 138 and therefore denies the same.

12 139. This paragraph includes legal conclusions that require no response, and the
13 Attorney General alleges that HB 2243 speaks for itself and further denies any allegations
14 contained in this paragraph that are inconsistent with or otherwise mischaracterize HB 2243.
15 The Attorney General lacks information to admit or deny all remaining allegations in
16 Paragraph 139 and therefore denies the same.

17 140. This paragraph includes legal conclusions that require no response. To the
18 extent a response is required, the Attorney General lacks sufficient information to admit or
19 deny any remaining allegations in Paragraph 140 and therefore denies the same.

20 141. Deny.

21 142. Deny.

22 **FIFTH CAUSE OF ACTION**

23 **Violation of the Fifteenth Amendment**
24 **U.S. Const. Amend., XV; 42 U.S.C. § 1983**
25 **(Intentional Race Discrimination in Voting)**

26 143. The Attorney General incorporates by reference all preceding paragraphs as
27 if fully set forth herein.

28 144. This paragraph includes legal conclusions that require no response. To the
extent a response is required, the Attorney General admits the quoted language is accurately

1 reproduced, but she lacks sufficient information to admit or deny any remaining allegations
2 in Paragraph 144 and therefore denies the same.

3 145. This paragraph includes legal conclusions that require no response. To the
4 extent a response is required, the Attorney General admits the quoted language is accurately
5 reproduced, but she lacks sufficient information to admit or deny any remaining allegations
6 in Paragraph 145 and therefore denies the same.

7 146. Deny.

8 147. Deny.

9 148. Deny.

10 149. Deny.

11 150. Deny.

12 **SIXTH CAUSE OF ACTION**

13 **Violation of Section 8 of the National Voter Registration Act of 1993**
14 **42 U.S.C. § 1973gg, et seq.**
15 **(Purging of Voter Rolls)**

16 151. The Attorney General incorporates by reference all preceding paragraphs as
17 if fully set forth herein.

18 152. This paragraph includes legal conclusions that require no response. To the
19 extent a response is required, the Attorney General admits the quoted language is accurately
20 reproduced, but she lacks sufficient information to admit or deny any remaining allegations
21 in Paragraph 152 and therefore denies the same.

22 153. This paragraph includes legal conclusions that require no response. To the
23 extent a response is required, the Attorney General admits the quoted language is accurately
24 reproduced, but she lacks sufficient information to admit or deny any remaining allegations
25 in Paragraph 153 and therefore denies the same.

26 154. The Attorney General admits the quoted language is accurately reproduced,
27 but she lacks sufficient information to admit or deny any remaining allegations in Paragraph
28 154 and therefore denies the same.

1 155. Deny.

2 156. Deny.

3 157. Deny.

4 158. Deny.

5 **AFFIRMATIVE DEFENSES**

6 1. The Court lacks jurisdiction for lack of standing.

7 2. Plaintiffs' claims fail because they are not ripe, and thus, not yet fit for judicial
8 review.

9 3. Plaintiffs fail to state a claim upon which relief can be granted.

10 4. Plaintiffs fail to meet the requirements for declaratory relief or preliminary or
11 permanent injunctive relief.

12 WHEREFORE, having fully answered Plaintiffs' Complaint, the Attorney General
13 respectfully requests that the Court dismiss the remaining counts of Plaintiffs' Complaint
14 with prejudice, deny Plaintiffs' request for injunctive relief, deny Plaintiffs' request for
15 declaratory relief, order that Plaintiffs take nothing, and award the Attorney General any
16 such other and further relief as the Court deems appropriate.

17 **DEMAND FOR JURY TRIAL**

18 Pursuant to Rule 38 of the Federal Rules of Civil Procedure, the Attorney General
19 hereby demands a trial by jury in this action of all issues so triable.
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DATED this 17th day of March, 2023.

KRISTIN K. MAYES
ATTORNEY GENERAL

By: /s/ Hayleigh S. Crawford
Hayleigh S. Crawford (No. 032326)
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