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SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

REPUBLICAN NATIONAL COMMITTEE, REPUBLICAN PARTY OF ARIZONA, LLC, and YAVAPAI COUNTY REPUBLICAN PARTY,

Plaintiffs,

v.

ADRIAN FONTES, in his official capacity as Arizona Secretary of State;

Defendant.

No: CV2024-050553

ARIZONA SECRETARY OF STATE'S REPLY IN SUPPORT OF MOTION TO DISMISS

(Assigned to the Hon. Frank Moskowitz)

Defendant Secretary of State Adrian Fontes respectfully requests that this Court dismiss Plaintiffs' Verified Complaint pursuant to Ariz. R. Civ. P. 12(b)(1) and (6).

INTRODUCTION

The Consolidated Response and Reply ("Response") filed by Plaintiffs the Republican National Committee, the Republican Party of Arizona, LLC, and the Yavapai County Republican Party (collectively, "Plaintiffs") is insufficient to justify their sweeping requested relief, whether against the entire Elections Procedures Manual ("EPM") or its discrete provisions. The statute empowering the Secretary to promulgate the EPM in conjunction with multiple other parties provides the only procedure for promulgating a valid EPM. Moreover, the expansion of the EPM is a direct result of the legislature's continued reliance on—and expansion of—the topics that are entrusted to the experts in election administration who create the EPM. Furthermore, the individual rules that Plaintiffs challenge are valid and should not be struck down.

I. Plaintiffs Lack Standing to Maintain this Action.

Plaintiffs have not met Arizona's standing requirement here. Plaintiffs' response to the arguments raised in the Secretary's Consolidated Motion to Dismiss and Response to Motion for Preliminary Injunction ("Motion") boils down to the fact that they are a recognized political party in Arizona. (Resp. 29). This fact is uncontested, but it is insufficient to confer standing. "To gain standing to bring an action, a plaintiff must allege a distinct and palpable injury. An allegation of generalized harm that is shared alike by all . . . generally is not sufficient to confer standing." *Sears v. Hull*, 192 Ariz. 65, 69, ¶ 16 (1998).

Plaintiffs' argument that because the violation of an EPM provision is a crime and "the conduct of persons campaigning, voting, observing, administering, and reporting on elections is governed by the EPM," then they have a distinct and palpable injury, is incorrect. (Resp. 29). As explained in the Motion, the EPM generally governs the actions of election officials, not political parties, candidates, or voters. Plaintiffs'

generalized, self-serving claim of an interest in imposing their preferred policy choices through the EPM is not enough when that is the same kind of harm any member of the general public may allege. *Arcadia Osborn Neighborhood v. Clear Channel Outdoor, LLC*, 256 Ariz. 88 at ¶ 29 (App. 2023). Similarly, the claim of diversion of resources by organizations has been disclaimed by Arizona courts, to "prevent[] parties from eviscerating the standing requirement by merely asserting an interest." *Ariz. Sch. Bds. Ass'n., Inc. v. State*, 252 Ariz. 219, 224 ¶ 18 (2022) (citations omitted).

The allegation that they are parties "who *[are] or may be* affected by a rule" likewise does not meet the standing requirement. (Resp. 29). As an initial matter, because the EPM was promulgated pursuant to A.R.S. §16-452, not Arizona's Administrative Procedures Act ("APA"), A.R.S. § 41-1034, the section upon which Plaintiffs rely for providing standing, does not apply. *See State Tax Comm'n v. Wallapai Brick & Clay Products, Inc.*, 85 Ariz. 23, 29 (1958) (explaining that A.R.S. § 41-1034 provides plaintiffs with the ability to pursue a declaratory judgment against a rule adopted under the APA). Moreover, the EPM binds election officials, not the parties. Because the APA does not apply, the Plaintiffs do not have standing to seek a declaratory judgment to enjoin the EPM.

Plaintiffs also argue they have a "beneficial[] interest[] in compelling the Secretary to perform his legal duty consistent with statute" as sufficient to confer standing. (Resp. 31). This argument relies upon *Ariz. Public Integrity All. v. Fontes*, 250 Ariz. 58 (2020). But that case explicitly and expressly applied "a more relaxed standard for standing in mandamus actions." *Id.* at ¶ 11. This is not a mandamus action. Accordingly, Plaintiffs must meet the traditional standing requirements and "allege a distinct and palpable injury" to have standing to bring a lawsuit. *Sears*, 192 Ariz. At 69, ¶ 16. They have failed to do so, and this Court should dismiss this case.

II. The 2023 EPM Is Valid.

A. The Length of Prior EPMs Is Irrelevant and Misleading.

Plaintiffs begin with a recitation of the statutory history of A.R.S. § 16-452, which empowers the Secretary of State, in conjunction with many other elected officials—from Chinle to Yuma, Bisbee to Yucca—to create the EPM. (Resp. 3-4). However, that recitation quickly gives way to argument which falsely attempts to contrast prior versions of the EPM with the 2023 EPM. This contrast fails because the legislature has continued to add more subjects and procedures that must be covered by the EPM since 1996.

Plaintiffs compare, for example, the section on voter registration from 1996—nearly thirty years ago—to the 2023 EPM, without acknowledging the major changes that have occurred in election law since then. (Resp. 5). For example, Arizona created secured voter registration the same year the 1996 EPM was promulgated, adopted documentary proof of citizenship requirements ("DPOC") by citizens' initiative in 2004, created the statewide voter registration database after the 2002 adoption of the Help America Vote Act ("HAVA"), and adopted the Address Confidentiality Program in 2014. *See* EPM 2-54. In short, the expansion of the chapter on voter registration is directly attributable to new laws, at both the state and federal level. It is not, as Plaintiffs argue, a power grab by the Secretary. (Resp. 2-5).

B. The EPM is Exempt from the APA.

Plaintiffs argue that a "statute's silence does not exempt the [agency] from the APA's rulemaking procedure," which is correct, but inapposite. (Resp. 6) (quoting *Ariz. State Univ. ex rel. Ariz. Bd. of Regents v. Ariz. State Retirement Sys.* ("*ASU*"), 237 Ariz. 246, 252, ¶ 23 (App. 2015)). The Secretary does *not* argue that the silence of the statute provides the exemption; it is the provision of an alternative, and distinctly contradictory, express procedure that exempts the EPM from the APA. (Mot. 5-8). This is unlike the agency in *ASU*, which adopted a rule in a vacuum, without any direction from the legislature as to what procedures to follow to make the rule effective. *ASU*, 237 Ariz. at

252, ¶ 23; *see also Carondelet Health Servs., Inc. v. Ariz. Health Care Cost Containment Sys. Admin.*, 182 Ariz. 221, 228 (App. 1994) (requiring AHCCCS to set rates, providing no procedural direction for doing so, but referring to "rulemaking" which had previously been subject to the APA). Unlike the rules in *ASU* and *Carondelet*, the Secretary followed the express direction of the legislature to promulgate the 2023 EPM, and therefore, it is valid.

The APA is a statutory framework to ensure procedural guardrails on an individual agency's rulemaking authority, and the legislature provided similar guardrails in A.R.S. § 16-452. Plaintiffs agree that the legislature "of course is not limited in its placement of an exemption," but then argue that because the legislature did not state the exemption that Plaintiffs prefer, the 2023 EPM is invalid. (Resp. 7). It is the legislature's provision of different, contradictory guardrails on the Secretary's rulemaking authority when he promulgates the EPM—and *only* the EPM—that serves as the express exemption from the APA.

When Plaintiffs point to other statutes, like A.R.S. § 16-974(D), to support their argument of what satisfies an express exemption, they overlook the fact that the express exemptions they identify are a zero-sum alternative; either, the agency is subject to the APA or it is exempt from the APA. But with A.R.S. § 16-452, the legislature did something different: it provided a workable framework for promulgating the EPM that requires input from other officials in crafting such an important set of procedures, without requiring the application of the APA. At bottom, Plaintiffs' claim is that the legislature *should have* used a belt and suspenders approach, by providing a separate and contradictory framework from the APA *and* expressly using words like "rules adopted pursuant to this chapter are exempt from title 41, chapters 6 and 6.1." The law requires only one exemption from the APA, and that is embodied in A.R.S. § 16-452.

Moreover, the legislature has actively increased the scope of the EPM, and never hinted that the APA controlled by changing the terms of A.R.S. § 16-452. The legislature

has added to the Secretary's authority *at least fourteen times* since 2005, including one change this year. *See* 2024 Ariz. Leg. Serv. Ch. 79 (S.B. 1342). If the legislature believed that the Secretary was violating state law, it surely would have said so. Indeed, the legislature has taken steps in the recent past to address what it viewed as inadequacies of the procedure for promulgating the EPM. *See, e.g.*, 2019 Ariz. Leg. Serv. Ch. 99 (H.B. 2238) (amending the procedure to produce the EPM to include deadlines to submit to the attorney general and governor and provide a date by which the EPM must issue). Notably, this amendment followed many years when no updated EPM was issued.[1] The legislature's decision not to change the terms of A.R.S. § 16-452 in the face of this consistent application, coupled with the legislature's intentional expansion of the subjects governed by the EPM, all support the Secretary's position.

The APA exists to ensure that a single agency is not the final word on the creation, implementation, and enforcement of rules, but that concern does not apply to the multi-party promulgation procedure created by A.R.S. § 16-452. To attack the Secretary's argument, Plaintiffs argue that "the APA contemplates—and at times, requires—the governor's involvement in rulemakings covered by the APA," (Resp. 9), then cites A.R.S. § 41-1052. But this statute only refers to the Governor's Regulatory Review Council's ("GRRC") review of rules. It is self-evident that GRRC is *not* "the governor." Indeed, that agency is not in the office of the governor, either.[2] The participation of GRRC, like the approval by the attorney general as to form, is very different than the process here, where the governor is a required *participant* in promulgating the EPM. (Compl. ¶ 36 (stating that fifteen additional pages, including many of the discrete contested provisions, were added to the EPM after consultation with the Governor and

[1] Ariz. Memory Project, Ariz. Elections Procedures Manuals Publication Set, *available at* https://azmemory.azlibrary.gov/nodes/view/260970 (showing no EPM was produced between 2014 and 2019).

[2] *See* Ariz. Governor's Regulatory Review Council, "FAQ Page" *available at* https://grrc.az.gov/about/faq (providing "Is the Council within the Governor's Office? No. The Council is a division of the Department of Administration.").

Attorney General)). The governor's participation in this process is another indication that A.R.S. § 16-452 intended to exempt the EPM from the APA.

Plaintiffs also address at length an Attorney General opinion from the 1970s to support its position that the multi-party nature of the EPM's promulgating statute does not reflect the legislative intent to exempt the EPM from the APA, but that is incorrect. The opinion addresses the effect of a change in the framework applicable to emergency orders issued by the governor and the department of emergency management, but a change of promulgating frameworks is not at issue here, because the same one—A.R.S. § 16-452—has always controlled. Moreover, the opinion states that "[w]ith respect to [rules] made, amended or rescinded by counties or other political subdivision of the state, A.R.S. § 26-307.B specifies that such a rule 'is effective when a copy is filed in the office of the clerk of the political subdivision.' This procedure pertains only to these entities and *is an alternative to the APA*." (Resp. Exh. 1 at 6) (emphasis added). The upshot is that even the opinion that Plaintiffs cite agrees that statutory language providing an alternate procedure for promulgating rules exempts those rules from the APA.

C. Plaintiffs' Requested Relief Is Inequitable.

Plaintiffs' argument that "no inequitable result would come from applying the APA to the 2023 EPM" because Arizona elections would thus "merely revert to the 2019 EPM" lays bare the true intent of Plaintiffs—to force the adoption of Plaintiffs' preferred policy in contravention of the law. (Resp. 14). The 2023 EPM was promulgated using the same procedure used for every EPM since at least 1993. (Resp. 4). If the 2023 EPM is invalid because it was not promulgated pursuant to the APA, as Plaintiffs argue, then the 2019 EPM is invalid for the same reason. The result that Plaintiffs want to elide is that *no* EPMs would be valid under their theory of the law.

Plaintiffs' remedy would require this Court to graft the APA onto the express procedure to create the EPM provided by the legislature, but it would also require the Court to overrule the legislature's explicit requirement that a host of other procedures in

statutes throughout Titles 16 and 19 are controlled by the EPM. Such a result, on the eve of a presidential election in which Arizona may well prove decisive, would be burdensome to elections officials required to administer the elections, among others. Moreover, the 2019 EPM is now out of date. There have been numerous statutory changes and court decisions affecting election law since the 2019 EPM. The argument that elections officials could just continue to rely on an out of date document, instead of the current EPM, is wrong and sure to cause confusion on the eve of an upcoming election. *See Purcell v. Gonzalez*, 549 U.S. 1, 4-5 (2006) (declining to enjoin Arizona's voter identification law due to the potential for voter confusion).

D. Waiver and Laches Bar Plaintiffs' Claims.

Waiver and laches prevent the Plaintiffs from pursuing the APA claim in this action. While Plaintiffs may not be equitably barred from making claims against rules that were not officially promulgated, that is not the argument here. Plaintiffs knew that the Secretary—like every administration before him—would follow the procedure in A.R.S. § 16-452 in promulgating the EPM, rather than the APA. It further had confirmation of that fact when the Secretary provided that public comment would be taken for fifteen days, rather than thirty. (Compl. ¶ 32). Plaintiffs complained of this fact in their comments, but nonetheless did not bring suit until February. And instead of contesting specific provisions of the EPM, which may have changed before the final rules were issued and thus could justify Plaintiffs' delay, they waited more than *six months* before suing to void the 2023 EPM in its entirety. The scope of the relief sought weighs heavily in favor of finding laches and waiver.

III. Plaintiffs' Claims Against the Individual EPM Provisions Fail.

Unable to completely upend election administration in Arizona by striking the EPM *in toto*, Plaintiffs are left to nibble around the edges on seven specific provisions of the 2023 EPM.[3] But, as explained in greater detail in the Motion to Dismiss, Plaintiffs'

[3] Plaintiffs Complaint challenges eight provisions of the EPM, but they now concede that their Count IV, challenging the EPM provisions concerning A.R.S. § 16-127(A)(2),

attempt to supplant EPM provisions created through consultation with county election officials and the multi-agency process described above with their preferred interpretation of Arizona law does not establish that any of the challenged provisions should be stricken from the manual.

As an initial matter, Plaintiffs' claims about some of the challenged provisions are not based on "an actual controversy between the parties." *Brush & Nib Studio, LC v. City of Phoenix*, 247 Ariz. 269, 280, ¶ 36 (2019); *see also Mills v. Ariz. Bd. of Tech. Registration*, 253 Ariz. 415, 424-25, ¶¶ 29-30 (2022) (conditioning standing to seek declaratory judgment on "whether an actual controversy exists" because the plaintiff has a "real and present need" to resolve the case to avoid imminent harm). Several of Plaintiff's claims relate to hypothetical future situations, not present controversies. In particular, Plaintiffs acknowledge that the EPM provision challenged in Count V accurately reflects what is currently practicable for county election officials. (Resp. at 23). But they assert that "[i]f the databases become available to county recorders while the 2023 EPM is effective" a conflict will arise between statute and the EPM. (*Id.*) If that happens, and county recorders do not check the identified databases when practicable, Plaintiffs can raise that claim. But until then, the claims is not ripe and there is no justiciable controversy warranting the declaratory relief Plaintiffs seek. Similarly, Plaintiffs argue that their claim regarding federal-only voters participating in the PPE is ripe because "there is no guarantee of a new EPM before the next PPE." (*Id.* at 21). There is, however, such a guarantee—A.R.S. § 16-452(B). *See Donaldson v. Sisk*, 57 Ariz. 318, 324 (1941) ("It is presumed that every public officer does his duty."). Plaintiffs cannot rely on a previous failure to carry out statutory duties to make Count III anything but a request for an advisory opinion about a future EPM.

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relating to federal-only voters voting by mail, fails in the face of the district court's decision in *Mi Familia Vota v. Fontes*, No. CV-22-00509-PHX-SRB, 2023 WL 8181307, at *7-8 (D. Ariz. Sept. 14, 2023). (Resp. at 21 n.8).

A. The EPM Is Consistent With A.R.S. § 16-165(A)(10).

Plaintiff's argument regarding Count II focuses on what constitutes confirmation of citizenship, but nothing in their argument demonstrates that the EPM's direction to county recorders contravenes A.R.S. § 16-165(A)(10). *See, e.g., Leibsohn v. Hobbs*, 254 Ariz. 1, 7, ¶ 22 (2002). The challenged EPM provision instructs county recorders not to request documentary proof of citizenship from a voter who has already provided DPOC, because that voter has already established that the voter is a United States citizen. *See* 2023 EPM, at 43. Plaintiffs argue that A.R.S. § 16-165(A)(10) "provides a confirmation mechanism—a letter requiring submission of DPOC." (Resp. at 17). But they misread the statute. A.R.S. § 16-165(A)(10) directs county recorders to send a letter to the registered voter asking for DPOC only *after* the recorder has "confirm[ed] that the registrant is not a citizen." Reviewing their own records showing that the voter provided DPOC obviates such confirmation. Plaintiffs would have county recorders ignore the information that they have received directly from voters demonstrating that they are citizens and instead require them to rely on a summary report from the jury commissioner that may contain errors or reflect a person's misguided attempt to avoid serving on a jury.

B. The EPM Properly Reflects Federal-Only Voters' Right to Vote in PPEs.

While they acknowledge the effect on one of their claims of the federal court's decision in *Mi Familia Vota*, which concluded that the NVRA preempts A.R.S. § 16-127(A), Plaintiffs argue that with respect to the Presidential Preference Election ("PPE"), the district court's determination does not apply because PPEs are not governed by the U.S. Constitution's Electors Clause. (Resp. at 20). In addition, they argue that the selection of delegates to a party's presidential nominating convention is different from a primary for another office. (*Id.*). Essentially their argument is that the PPE is not a presidential election. But that argument has a fatal flaw. A.R.S. § 16-127(A)(1) provides that federal-only voters are not permitted to vote in "presidential elections." If the PPE is

not a presidential election, then A.R.S. § 16-127, by its own terms, does not apply to the PPE, and Arizona law contains no prohibition on federal-only voters casting PPE ballots.

C. The EPM Does Not Unlawfully Bar Plaintiffs' Access to Signatures.

Much like the unripe claims discussed above, Plaintiffs' argument regarding public access to voter signatures in the voter registration record seems to be merely theoretical—not a live controversy needing this Court's resolution. Plaintiffs expound on the absence of an oxford comma in A.R.S. § 16-168(F) not having the meaning that one of the Intervenors ascribes to it, but they wholly fail to explain how the EPM bars them or any other person from accessing voter signatures to which A.R.S. § 16-168(F) says they are entitled. (Resp. at 24-25). Indeed, Plaintiffs argue that the canons of statutory construction dictate that "election purposes" in A.R.S. § 16-168(F) must mean something, but they do not explain what that is. (*Id.*). Nor do they identify any purpose for which they have been denied access to voter signatures by a county recorder following the EPM that contravenes A.R.S. § 16-168(F).

D. Voters Temporarily Out of State Can Receive an Early Ballot.

With respect to Count VII, Plaintiffs argue that the EPM conflicts with A.R.S. § 16-544 because it does not require voters on the Active Early Voting List ("AEVL") to conduct three separate transactions to have an early ballot sent to a temporary out of state address on a one-time basis. (Resp. at 25). Plaintiff's argument, however, completely ignores the language of the statute, which bars using a non-Arizona address "for the purpose of the *active early voting list*." A.R.S. § 16-544(B) (emphasis added). The statute does not say "for the purpose of early voting." Accordingly, the EPM provision that plainly states that an AEVL voter "may not request that ballots be automatically sent to an out-of-state address for each election," but allows for a one-time request that will not change the voter's address on AEVL is wholly consistent with A.R.S. § 16-544(B). 2023 EPM, at 59.

E. Early Ballot Challenges Must Occur Before Envelopes Are Opened.

Plaintiffs arguments regarding the timing of early ballot challenges are similarly unavailing. They posit a circumstance in which a challenge is made when an early ballot envelope has been opened, but the ballot has not yet been separated from the envelope. This is a surprising position for Plaintiffs to take. Indeed, just last year, one of the Plaintiffs argued (unsuccessfully) to the Arizona Court of Appeals that voting by mail violated the Arizona Constitution's guarantee of ballot secrecy. *Ariz. Republican Party v. Fontes,* No. 1 CA-CV 22-0388, 2023 WL 193620, at *1, ¶ 1 (Ariz. App. Jan. 17, 2023) (memorandum decision). But their interpretation of the time elements of A.R.S. § 16-552(D), permitting a challenge when an envelope has been opened, would risk harming the secrecy of the challenged voter's ballot.

F. Plaintiffs Should Not Be Allowed to Disenfranchise Voters.

Finally, Plaintiffs complain that the EPM's common-sense instruction to election workers that they use the technology to which they have access to make sure that a voter casting a provisional ballot receives a ballot that will be counted because it contains the right races for that voter violates A.R.S. § 16-122. (Resp. at 26-27). As explained in the Secretary's Motion, Plaintiffs' argument ignores the provisional ballot requirement in A.R.S. § 16-584, which implements federal HAVA requirements. (Mot. at 21-22). In view of the fact that more than 83% of Arizona voters live in vote center counties, and provisional ballots are very small percentage of ballots cast in any election, this is hardly the "sea change" Plaintiffs fear. It is instead one small way that counties can avoid disenfranchising the few voters who show up to vote on election day, but find themselves in a voting location that is not assigned to their precinct. Plaintiffs seem to prefer that such voters lose their right to vote that day.

CONCLUSION

For all the foregoing reasons, this Court should dismiss Plaintiffs' claims.

Respectfully submitted this 22nd day of April, 2024.

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