Multiple Documents

Part	Description
1	Main Document
2	Affidavit Declaration of Carolina Rodriguez-Greer
3	Affidavit Declaration of Ameer Patel

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UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Mi Familia Vota, et al.,

Plaintiffs,

v.

Katie Hobbs, et al.,

Defendants.

Living United for Change in Arizona, et al.,

Plaintiffs,

v.

Katie Hobbs,

Defendant,

and

State of Arizona, et al.,

Intervenor-Defendants.

Case No. 2:22-cv-00509-SRB

MFV PLAINTIFFS' OPPOSITION TO STATE'S CONSOLIDATED MOTION TO DISMISS

Poder Latinx,

Plaintiff,

v.

Katie Hobbs, et al.,

Defendants.

United States of America,

Plaintiff,

v.

State of Arizona, et al.,

Defendants.

Democratic National Committee, et al.,

Plaintiffs,

v.

State of Arizona, et al.,

Defendants,

and

Republican National Committee,

Intervenor-Defendant.

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The State contends Mi Familia Vota and Voto Latino ("MFV/VL") lack standing and fail to state cognizable claims, moving to dismiss their Second Amended Complaint ("SAC") (ECF No. 65). MFV/VL are nonprofits with the mission of engaging Latinx communities politically, including through voter registration and mobilization in Arizona. SAC ¶¶ 16–21. They allege H.B. 2492: (1) imposes unjustifiable burdens on the right to vote; (2) strips current voters of the right to vote without sufficient due process; (3) violates equal protection by treating voters differently based on the form they use to register; (4) violates the NVRA; and (5) violates the Civil Rights Act. *See generally id*. These are viable claims and MFV/VL have standing to pursue them. The Motion should be denied.[1]

I. MFV/VL have standing and their claims are ripe.

MFV/VL have standing because they allege injuries in fact, traceable to Defendants, and redressable by this Court. *Lujan v. Defs. of Wildlife*, 504 U.S. 555, 560–61 (1992). The State challenges only their injury, as insufficient or not ripe.[2] It is wrong on both counts.

MFV/VL allege that H.B. 2492 threatens their missions by disenfranchising the communities they exist to educate, register, and mobilize, requiring them to divert resources to education about H.B. 2492 and to identify and re-register impacted voters. *See* SAC ¶¶ 18, 21; Decl. of Carolina Rodriguez-Greer ("MFV Decl.") ¶¶ 5, 12, 14, 15, 19; Decl. of Ameer Patel ("VL Decl.") ¶¶ 7, 11, 12, 19, 20, 23. MFV/VL's allegations are more than sufficient. *See, e.g.*, *Sabra v. Maricopa Cnty. Cmty. Coll. Dist.*, 44 F.4th 867, 879–80 (9th Cir. 2022); *Nat'l Council of La Raza v. Cegavske*, 800 F.3d 1032, 1036 (9th Cir. 2015); *Arcia v. Fla. Sec'y of State*, 772 F.3d 1335, 1341–42 (11th Cir. 2014). This is not like *La Asociación de Trabajadores de Lake Forest v. City of Lake Forest*, 624 F.3d 1083 (9th Cir. 2010), where the plaintiff "failed to assert any [facts] . . . that it was forced to divert resources . . . because of the defendants' actions." *Id.* at 1088. "Given that as part of their

[1] MFV/VL incorporate the oppositions filed by the other Plaintiffs.

[2] MFV/VL do not argue associational standing and filed suit against the Secretary, Attorney General, and all county election recorders. The State's arguments regarding associational standing, traceability, or redressability do not apply.

missions" MFV/VL work to enfranchise voters, "it cannot be said" they "are spending money to fix a problem that otherwise would not affect them." *We Are Am./Somos Am., Coal. of Ariz. v. Maricopa Cnty. Bd. of Supervisors*, 809 F. Supp. 2d 1084, 1099–1100 (D. Ariz. 2011) (distinguishing *City of Lake Forest*).[3]

Second, the matter is ripe for the reasons detailed in Poder Latinx's opposition. The statutory text *requires* voters to be removed from the rolls and threatened with investigation or prosecution, and the State has not said it will not enforce it. Accordingly, "the statute will be enforced against some" voters MFV/VL helped or will help register. *Fla. State Conf. of N.A.A.C.P. v. Browning*, 522 F.3d 1153, 1164 (11th Cir. 2008); MFV Decl. ¶ 13; VL Decl. ¶¶ 9, 13. MFV/VL must divert resources away from mission-critical efforts to prevent these threats. MFV Decl. ¶¶ 5, 12, 14, 15, 19; VL Decl. ¶¶ 7, 11, 12, 19, 20, 23.

II. Counts I, II, and III allege cognizable constitutional claims.

MFV/VL allege facts that, taken as true, allege claims that H.B. 2492 violates the right to vote, due process, and equal protection under any applicable framework. *See Boquist v. Courtney*, 32 F.4th 764, 773–74 (9th Cir. 2022). The Motion should be denied.

A. Legal standard.

In this Circuit, challenges to state election laws imposing burdens on the right to vote have generally been evaluated using the *Anderson-Burdick* test. This is no "litmus-paper test" neatly separating "valid from invalid restrictions"; in each case, the Court must carefully examine the facts to weigh "the character and magnitude of [plaintiffs'] asserted injury to the rights protected," against "the precise interests put forward by the State as justifications for the burden imposed by its rule." *Anderson v. Celebrezze*, 460 U.S. 780,

[3] The stage of this action also distinguishes *Friends of the Earth v. Sanderson Farms, Inc.*, 992 F.3d 939, 942–43 (9th Cir. 2021) (finding no standing after years of litigation and extended discovery); *Jacobson v. Fla. Sec'y of State*, 974 F.3d 1236, 1250 (11th Cir. 2020) (post-trial); and *NAACP v. City of Kyle*, 626 F.3d 233, 238–39 (5th Cir. 2010) (post-trial). Standing "must be supported with the manner and degree of evidence required at" relevant stage; on a motion to dismiss, general factual allegations of injury traceable to defendants' conduct are sufficient. *Mecinas v. Hobbs*, 30 F.4th 890, 896–97 (9th Cir. 2022).

789 (1983). It "also must consider the extent to which those interests make it necessary to burden the plaintiff's rights." *Id*. In other words, *Anderson-Burdick* applies a "means-end fit framework." *Pub. Integrity All. v. City of Tucson*, 836 F.3d 1019, 1024 (9th Cir. 2016).

Because this analysis is highly fact-intensive, *Anderson-Burdick* claims are generally not amenable to pre-discovery dismissal unless the burdens are truly *de minimis*. *See, e.g.*, *Soltysik v. Padilla*, 910 F.3d 438, 447, 450 (9th Cir. 2018) (reversing order granting dismissal as "premature": "without any factual record . . . we cannot say" the state's "justifications outweigh the constitutional burdens . . . as a matter of law"); *Mecinas*, 30 F.4th at 905 ("[T]he magnitude of the asserted injury . . . cannot be resolved on a motion to dismiss."). Where, as here, plaintiffs allege infringement on multiple rights, the burden is exacerbated. *See, e.g.*, *Yang v. Kosinski*, 960 F.3d 119, 130–34 (2d Cir. 2020) (holding burden substantial where law implicated rights to vote, due process, and association); *McLaughlin v. N.C. Bd. of Elections*, 65 F.3d 1215, 1221 (4th Cir. 1995) (finding law imposed severe burden because it "implicate[d] substantial voting, associational and expressive rights protected by the First and Fourteenth Amendments").[4]

B. MFV/VL sufficiently allege burdens to sustain each claim.

First, MFV/VL allege that H.B. 2492 severely burdens the right to vote by denying impacted Arizonans that right entirely in presidential elections and by mail, threatening them with criminal investigation, imposing unjustified costs on new voters, and complicating an already convoluted registration process. *See* SAC ¶¶ 3, 62–69, 79; *see also Pub. Integrity All.*, 836 F.3d at 1024 n.2 (holding when evaluating severity of burdens, courts may consider "its impact on subgroups, for whom the burden, when considered in context, may be more severe"). The State's reliance on *Short v. Brown*, 893 F.3d 671 (9th

[4] In *Arizona Democratic Party v. Hobbs*, 18 F.4th 1179, 1195 (9th Cir. 2021), the Ninth Circuit considered a procedural due process claim under *Anderson-Burdick* that plaintiffs "d[id] not argue . . . differ[ed] in some material way from their [right to vote] claim," thus not addressing a case, like here, with distinct due process allegations, as Poder Latinx's opposition explains. Under either test, MFV/VL survive a motion to dismiss.

Cir. 2018), is thoroughly misplaced. *Short* involved a pilot program to send ballots to all California voters, offered first in a subset of counties. *Id*. at 674. The plaintiffs sought an injunction, arguing the program "dilute[d]" votes in the "disfavored" counties. *Id*. at 677. In rejecting the challenge, the Ninth Circuit emphasized the law did "not burden anyone's right to vote," and "access to the ballot" for voters outside the test counties was "exactly the same" as before. *Id*. The plaintiffs had "not even alleged . . . that the [law] w[ould] prevent anyone from voting," nor did they cite "any authority explaining how a law that makes it easier to vote" could be unconstitutional. *Id.* at 677–78. H.B. 2492 does not make it easier to vote, and MFV Plaintiffs plausibly allege it will prevent voters who could have previously voted by mail or in presidential elections from doing so *at all*.[5]

Second, distinct from their right to vote claim, MFV/VL allege the law violates due process by stripping current federal-form voters of the right to vote by mail without notice and an opportunity to cure. SAC ¶¶ 3, 63–65, 84–85. *See, e.g.*, *Greene v. Lindsey*, 456 U.S. 444, 449 (1982) (noting due process at a minimum requires notice and an opportunity to cure). That the Ninth Circuit has evaluated election law challenges based on different rights using *Anderson-Burdick* does not collapse those rights into one indistinguishable, amorphous right, nor does it insulate the voting context from having to comply with procedural due process, a right explicitly guaranteed by the Fourteenth Amendment. *See* U.S. const., amend. 14 ("No State shall . . . deprive any person of life, liberty, or property, without due process of law . . . ."); *cf. Hufford v. McEnaney*, 249 F.3d 1142, 1151 (9th Cir. 2001) (holding if a "claim can be analyzed under an explicit textual source of rights in the Constitution, a court should not resort to" a more subjective standard). For each claim, the balancing of the injury's character and magnitude may differ, based on the *right at issue*.

[5] The State also cites *Crawford v. Marion County Election Board*, 553 U.S. 181 (2008), and *Gonzales v. Arizona*, 677 F.3d 383 (9th Cir. 2012), but both evaluated burdens *after* the record was developed. *See Crawford*, 553 U.S. at 187; *Gonzales*, 667 F.3d at 389. They provide no basis to find these plaintiffs will be unable to prove that H.B. 2492's burdens outweigh the State's proffered justifications for imposing them in this case or at this stage.

See, e.g., *Democracy N.C. v. N.C. State Bd. of Elections*, 476 F. Supp. 3d 158, 225–29 (M.D.N.C. 2020) (separately evaluating procedural due process and right to vote claims); *Self Advoc. Sols. N.D. v. Jaeger*, 464 F. Supp. 3d 1039, 1051–53 (D.N.D. 2020) (same).

A protected liberty interest protected by procedural due process "may arise from an expectation or interest created by state laws or policies." *Marsh v. Cnty. of San Diego*, 680 F.3d 1148, 1155 (9th Cir. 2012). Arizona has long conferred the right to vote by mail, A.R.S. § 16-541, creating precisely such an expectation. In fact, Arizona has conferred on its voters the right to vote by mail for so long that more than 30 years ago a federal district court found Arizona voters were entitled to procedural due process protections before their absentee ballots were disqualified. *Raetzel v. Parks/Bellemont Absentee Election Bd.*, 762 F. Supp. 1354, 1356–58 (D. Ariz. 1990). Other courts have similarly found due process protects the right to vote absentee in states that have conferred that right. *See, e.g.*, *Democracy N.C.*, 476 F. Supp. 3d at 227 ("[H]aving 'authorized the use of absentee ballots,' [the state] must afford appropriate due process protections . . . ."); *Martin v. Kemp*, 341 F. Supp. 3d 1326, 1338 (N.D. Ga. 2018) (similar). The State argues that this liberty interest is constrained by the "mandatory language" that a voter provide DPOC, Mot. at 17, but this is a misstatement of the applicable precedent.[6] Moreover, it is only true prospectively; previously, voters did not need DPOC to vote by mail. "Once a state creates a liberty interest, it can't take it away without due process." *Marsh*, 680 F.3d at 1155.

Third, H.B. 2492 denies equal protection by unjustifiably treating similarly situated voters differently. SAC ¶¶ 89–90*; City of Cleburne v. Cleburne Living Ctr.*, 473 U.S. 432, 439 (1985) (holding equal protection requires "all persons similarly situated . . . be treated alike"); *Hobbs*, 18 F.4th at 1190 (noting burden may be heightened where allegations assert burden "falls disproportionately on a discrete group of voters"). Federal-form voters registering without DPOC will be permitted to vote in congressional elections, but state-

[6] Specifically, the "mandatory language" test for the creation of a liberty interest is a feature principally of prisoners' rights cases and has been abandoned by the Supreme Court in those circumstances. *See Sandin v. Conner*, 515 U.S. 472, 483–84 (1995).

form voters presenting the same documents will have their registration rejected entirely. H.B. 2492 also arbitrarily discriminates against federal-form voters on the Federal Only Voters List by prohibiting them from voting by mail or in presidential elections. Similarly situated eligible voters not on the List retain these rights. The State's only rationale—requiring more of state-form voters gives it more confidence they are citizens, Mot. at 18–19—neither explains the first distinction nor justifies the burdens of the second.

C. The State's interests cannot justify the burdens on the rights alleged.

Separately and together, the burdens alleged are severe. But at a minimum, dismissal is inappropriate because Plaintiffs plausibly allege H.B. 2492 imposes burdens that are more than *de minimis*, and the State fails to show that even lesser burdens are justified by its purported interests in the law, or that it is necessary to advance those interests.

The State's conclusory assertion that its generalized interest in "securing its elections and maintaining voter confidence easily sustains" Plaintiffs' burdens cannot sustain dismissal. Mot. at 16. *Anderson-Burdick* requires the Court to carefully consider whether (1) the State's proffered interests are sufficiently weighty to justify H.B. 2492's burdens, *and* (2) there is a means-end fit between the State's proffered interests and H.B. 2492. *See supra* at Sec. II(A). The State makes *no effort* to explain how its asserted interests outweigh Plaintiffs' specific burdens, much less show a means-end fit. Instead, it claims this case is like *Crawford*. Mot. at 16. But courts routinely reject attempts to broadly analogize to *Crawford* at this stage. *See, e.g.*, *Mecinas*, 30 F.4th at 905; *Soltysik*, 910 F.3d at 447; *Veasey v. Perry*, 29 F. Supp. 3d 896, 915 (S.D. Tex. 2014). This is because, as *Crawford* emphasizes, *Anderson-Burdick* does not "neatly separate valid from invalid restrictions"; in each case, courts must "make the 'hard judgment' that our adversary system demands," based on specific facts. 553 U.S. at 190 (citing *Anderson*, 460 U.S. at 789–90). And, in *Crawford*, the Court found the state's interests sufficient *after* petitioners failed to produce evidence of their burdens *at summary judgment*. *Id.* at 187.

Neither of the out-of-circuit cases the State cites relieves it of the responsibility to

advance sufficiently weighty justifications for the burdens alleged, or to satisfy the means-fit test. *Frank v. Walker*, 768 F.3d 744 (7th Cir. 2014), did not hold that "*Anderson/Burdick* treats the State's interests as a 'legislative fact.'" Mot. at 16. It found only that "*whether a photo ID requirement promotes public confidence in the electoral system* [wa]s a 'legislative fact.'" *Frank*, 768 F.3d at 750 (emphasis added). And the holding in *Mays v. LaRose*, 951 F.3d 775, 789 (6th Cir. 2020), that "[n]o opinion from this court or the Supreme Court has ever limited the record that the State can build," is not relevant here, where the State moves to dismiss before any record-building. The State's failure to show a means-fit between H.B. 2492 and the interests it invokes, or explain how those interests justify the law's alleged burdens, is enough to deny its Motion. This is particularly true when Defendant Hobbs, who oversees the State's voter registration system, has admitted that "Arizona's early voting system is well tested and well established" and "there is no evidence of widespread fraud in Arizona's elections." Secretary Hobbs' Answer to MFV Plaintiffs' SAC ¶ 5, ECF No. 123 [hereinafter SOS].

III. Count IV alleges a cognizable claim under the NVRA.

As set forth by the United States and DNC, MFV/VL properly allege NVRA claims. The State fails to address the NVRA violations alleged by MFV/VL, SAC ¶¶ 96, 97, and the Secretary admits the law's relevant provisions conflict with the NVRA. SOS ¶¶ 96, 97.

IV. Count V alleges a cognizable claim under the Civil Rights Act.

The Civil Rights Act's Materiality Provision, 52 U.S.C. § 10101(a)(2)(B) ("MP"), prohibits "acting under color of law" to deny the right to vote because of an error or omission on a registration form that is immaterial to qualifications to vote. Plaintiffs allege H.B. 2492 violates this by forbidding voters from registering if they provide DPOC but fail to check a box indicating they are citizens or fail to list their birthplace on the state form, and prohibiting federal-form voters from voting in presidential elections or by mail absent DPOC. *See* SAC ¶¶ 102–05. The State first contends the MP has no private right of action; second, it argues the claim does not apply here. Both lack merit.

A. Private plaintiffs may enforce the Materiality Provision.

The statutory text, legislative history, and Supreme Court precedent all support finding there is a private right of action to enforce the MP. The Ninth Circuit has not considered the question, but the Eleventh Circuit thoroughly rejected the arguments that the State makes here in *Schwier v. Cox*, 340 F.3d 1284 (11th Cir. 2003).

The Court first asks "whether Congress intended to create a federal right." *Gonzaga Univ. v. Doe*, 536 U.S. 273, 283 (2002). Section 10101(a)(2)(B)'s rights-creating language—"no person" "shall" deny an individual's right to vote—evinces clear congressional intent to create a private right of action: it directly parallels language in Title VI, 42 U.S.C. § 2000d, and Title IX, 20 U.S.C. § 1681, which the Supreme Court has held creates private rights of action. *Gonzaga*, 536 U.S. at 284 n.3 (pointing to the "right- or duty-creating language" of Titles VI and IX of "no person" and "shall"); *see also Schwier*, 340 F.3d at 1296; *La Unión del Pueblo Entero v. Abbott*, No. 5:21-cv-0844-XR, 2022 WL 3045657 at *29–30 (W.D. Tex. Aug. 2, 2022). Section 10101(a)(1) includes further rights-creating language, which unambiguously confers a personal right, stating: "*[a]ll citizens* . . . who are otherwise qualified by law to vote . . . *shall be entitled and allowed to vote at all such elections*." (emphasis added); *see also Planned Parenthood Ariz. Inc. v. Betlach*, 727 F.3d 960, 966 (9th Cir. 2013) ("While express use of the term individuals (or persons or similar terms) is not essential to finding a right for § 1983 purposes, usually such use is sufficient for that purpose." (quotations omitted)); *Watson v. Weeks*, 436 F.3d 1152, 1160–61 (9th Cir. 2006) (holding right existed to enforce statute due to mandatory language conferring benefits for "all individuals").

When a statute includes clear rights-conferring language, § 1983 private enforcement is presumed unless "Congress specifically foreclosed a remedy." *Gonzaga*, 536 U.S. at 284 n.4 (quotations omitted). The Court "should 'not lightly conclude that Congress intended to preclude reliance on § 1983 as a remedy' for deprivation of a federally secured right." *Watson*, 436 F.3d at 1161 (quoting *Golden State Transit Corp. v.*

Los Angeles, 493 U.S. 103, 107 (1989)). To overcome the presumption of a private right of action, the State must point to "express[]" statutory evidence or "a comprehensive enforcement scheme" incompatible with § 1983 enforcement. *Id.* at 1158–59. Whether Congress established a "more restrictive private remedy" "has been the dividing line" if a § 1983 action lies. *Fitzgerald v. Barnstable Sch. Comm.*, 555 U.S. 246, 256 (2009) (quoting *City of Rancho Palos Verdes v. Abrams*, 544 U.S. 113, 121 (2005)).

No "more restrictive private" enforcement scheme exists here. *Id.* The State points to the Attorney General's enforcement power, Mot. at 25–26, but that is compatible with private enforcement. *See Gonzaga*, 536 U.S. at 284 n.4. Here, as in *Fitzgerald*—which held Title IX enforceable through § 1983—aggrieved parties can "file directly in court" without preconditions or exhaustion requirements. *Id.* at 255; 52 U.S.C. § 10101(d). The Attorney General's enforcement is not mandatory, 52 U.S.C. § 10101(c), and the legislative history shows Congress did not intend to preclude private enforcement. *See* H.R. Rep. No. 85-291 (1957) (The bill's purpose was "to provide means of *further* securing and protecting [individuals'] civil rights.") (emphasis added). The Attorney General's contemporaneous testimony shows this: "Under the laws amended [here], private people will retain the right they have now to sue." *Civil Rights Act of 1957: Hearings on S. 83*, 85th Cong. 73, 203, 1; 60–61, 67–73 (1957).[7]

To support its contrary position, the State relies primarily on *Hayden v. Pataki*, No. 00 Civ. 8586 (LMM), 2004 WL 1335921 (S.D.N.Y. June 14, 2004), which relies on *McKay v. Thompson*, 226 F.3d 752, 756 (6th Cir. 2000), amongst other conclusory cases. But *McKay* is flatly incorrect: it is entirely based on a 1978 Kansas case whose analysis runs

[7] Beyond § 1983, the Materiality Provision itself also demonstrates "an intent to create not just a private right but also a private remedy," *Alexander v. Sandoval*, 532 U.S. 275, 286 (2001), as evidenced by section 10101(d). *See, e.g.*, *Verizon Md., Inc. v. Public Serv. Comm'n of Md.*, 535 U.S. 635, 644 (2002) (provision allowing "any party aggrieved" to "bring an action" "reads like the conferral of a private right of action"); *see also* Brief for the U.S. as Amicus Curiae, *Migliori v. Lehigh Cnty. Bd. of Elections*, 36 F.4th 153 (3rd Cir. 2022) (No. 45), 2022 WL 1045078 at 7–21.

afoul of statutory language and Supreme Court precedent. *Schwier*, 340 F.3d at 1294–95. The State also cites *Northeast Ohio Coalition for Homeless v. Husted*, 837 F.3d 612, 630 (6th Cir. 2016), ignoring it was bound to follow *McKay* and conducted no independent analysis. *See id.* Otherwise, the State cites one other unpublished district court case, Mot. at 26, which contains little analysis. None of these cases rebut the Eleventh Circuits' well-supported approach.

B. MFV/VL sufficiently plead a Materiality Provision claim.

For the reasons set forth by Poder Latinx and the United States, the State's argument that the MP only applies to executive action beyond state law must be rejected. Next, the State claims that, because H.B. 2492 includes notice and cure provisions, it cannot violate the MP. Mot. at 27–28. Courts have properly rejected the argument that cure opportunities solve MP violations. *See, e.g.*, *Wash. Ass'n of Churches v. Reed*, 492 F. Supp. 2d 1264, 1271 (W.D. Wash. Aug. 1, 2006); *La Unión*, 2022 WL 1651215 at *21 (May 24, 2022).[8] Lastly, the State claims the information demanded *is* material. Mot. at 28–29. Not so. H.B. 2492 disenfranchises Arizonans who fail to check a box regarding citizenship or state their birthplace. Birthplace is never material to a voter's qualifications. And applicants *already* provide citizenship information (DPOC for state-form, citizenship attestation for federal-form); the new requirements are duplicative and immaterial. SOS ¶ 102 (admitting same regarding checkbox); *League of Women Voters of Ark. v. Thurston*, No. 5:20-CV-05174, 2021 WL 5312640 at *4 (W.D. Ark. Nov. 15, 2021).[9] The same is true for registered voters now required to provide DPOC: their citizenship was *previously* otherwise verified. *See, e.g.*, *Martin v. Crittenden*, 347 F. Supp. 3d 1302, 1309 (N.D. Ga. 2018).

[8] The cure opportunities the State references here deal solely with new registrants. This is separate from the provision of H.B. 2492 discussed earlier, which strips current federal form registrants of rights without notice or an opportunity to cure.

[9] *Diaz v. Cobb*, 435 F. Supp. 2d 1206 (S.D. Fla. 2006), is not analogous. There the court found checkboxes pertaining to specific qualifications were material because the voter oath there was a "general affirmation of eligibility." *Id.* at 1212–13. Here, the duplicative questions ask for the *same information*—i.e., information pertaining to citizenship.

Dated: October 17, 2022

Respectfully submitted,

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DECLARATION OF CAROLINA RODRIGUEZ-GREER

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Republican National Committee,

Intervenor-Defendant.

DECLARATION OF CAROLINA RODRIGUEZ-GREER

I, Carolina Rodriguez-Greer, according to 28 U.S. § 1746, hereby state:

1. My name is Carolina Rodriguez-Greer. I am over 18 years of age, am competent to testify, and declare the following facts based on my personal knowledge.

2. I am currently employed as the State Director of Mi Familia Vota, a national, nonprofit civic engagement organization with a mission of uniting Latino, immigrant, and allied communities to promote social and economic justice. Mi Familia Vota seeks to further this mission through increased civic participation by encouraging leadership development, citizenship, and issue organizing. I have been in this position since August of 2021. My duties require me to be knowledgeable about Mi Familia Vota's voting and voter-registration activities. I am also familiar with Mi Familia Vota's resource-allocation decisions. Mi Familia Vota operates in seven states, including Arizona, where it is headquartered. For nearly 20 years, Mi Familia Vota has been doing work to increase the civic participation of Arizonans and since 2016 has registered over 60,000 new voters.

3. To further its mission, Mi Familia Vota seeks to build Latino political power by expanding the electorate, strengthening local infrastructures, and conducting year-round voter engagement efforts. Accordingly, it spends significant resources on voter education, non-partisan registration, and mobilization both nationwide and in Arizona. These efforts take the form of voter registration drives where paid canvassers guide voters through filling out voter registration forms (including the Federal Form), Get-Out-The-Vote campaigns, text and phone banking drives, email and social media campaigns, radio and TV programming through major news and media outlets, strategic partnership collaborations, voter assistance events such as driving voters to the polls, and more. Mi Familia Vota has also challenged voter suppression around the nation through litigation. Through these efforts, Mi Familia Vota has helped countless eligible voters, including in Arizona, register to vote and successfully access the franchise.

4. The cost of carrying out these initiatives is significant. For the 2022 election cycle, Mi Familia Vota's program costs in Arizona alone, as of the date of this filing, have already cost $2 million and are expected to exceed $3 million. Mi Familia Vota expects to continue making expenditures in the millions of dollars to continue its critical initiatives to educate, register, mobilize, and turn out Latinx voters across the United States, including in Arizona. In fact, Arizona is one of Mi Familia Vota's highest priority states. In 2020, Mi Familia Vota collected well over 14,000 unique voter registration applications in Arizona. It currently has 35 field staff active in the state.

5. Given the importance of Arizona to Mi Familia Vota carrying out its mission, Arizona's House Bill 2492 ("HB 2492") will significantly frustrate this mission and harm the organization. Mi Familia Vota will be forced to divert money, personnel, time, and resources away from its other education, mobilization, and registration initiatives, both in Arizona and nationally, toward efforts to ensure that Latinx voters in Arizona can navigate the restrictions imposed by HB 2492.

6. I am aware of HB 2492's proof of citizenship requirements, which based on my understanding of the law will prohibit new registrants who register using the Federal Form from voting in presidential elections or by mail for any office unless they provide independent documentary proof of citizenship and prohibit currently registered voters who registered using the Federal Form without providing independent documentary proof of citizenship from voting in presidential elections or by mail for any office. I am also aware that the law goes into effect on January 1, 2023.

7. I am also aware of HB 2492's Attorney General referral requirements, which requires county recorders to research the citizenship of any voter who submits a Federal Form and (in addition to prohibiting them from voting in any election if the county recorder cannot determine they are a citizen) refer them to the county attorney and Attorney General for investigation. HB 2492 also requires the Secretary of State and county recorders to provide a list to the Attorney General of any voters who are registered to vote without what

the statute deems satisfactory proof of citizenship and requires the Attorney General to investigate the citizenship of these individuals, report their findings, and prosecute any individuals they believe are not citizens.

8. HB 2492's proof of citizenship requirement frustrates Mi Familia Vota's ability to fulfill its mission of uniting Latino, immigrant, and allied communities to promote social and economic justice by making it harder for eligible voters to register to vote, creating barriers for already lawfully registered voters to exercise their right to vote, making vote by mail and voting for certain offices harder to do, and confusing voters with convoluted registration requirements. These harms are especially likely to impact and disenfranchise Mi Familia Vota's core population, Latinx voters, as, in Mi Familia Vota's experience, Latinx voters are more likely to be naturalized citizens than non-Latinx voters, are less likely to be fluent English speakers, and are more likely to be from underserved communities.

9. Moreover, early voting and voting by mail are of great importance to the Latinx community in Arizona. In addition to its voter registration work, Mi Familia Vota has focused its Get-Out-The-Vote efforts on increasing Latinx vote-by-mail and early-vote turnout. HB 2492 targets vote by mail, jeopardizing a significant aspect of Mi Familia Vota's strategy in furtherance of its mission. Because HB 2492's proof of citizenship requirements threaten to disenfranchise individuals by preventing them from registering and from voting by mail without any clarity as to what notice, if any, voters will be given, HB 2492 threatens Mi Familia Vota's constituents' fundamental rights and strike directly at the heart of the organization's mission to grow the political engagement of the Latinx community.

10. HB 2492's Attorney General referral requirements are also likely to have a chilling effect on eligible voters' willingness to access the franchise because voters may fear wrongful investigation and prosecution and therefore choose to not risk registering to vote. This is especially true for Mi Familia Vota's constituents as historically

underrepresented communities, like Latinx communities, tend to have more negative relationships with, and to be more fearful of, law enforcement.

11. All of these independently and collectively have the potential to make the voters Mi Familia Vota seeks to register and mobilize less willing to exercise their right to the franchise, frustrating Mi Familia Vota's mission.

12. To guarantee that Mi Familia Vota can continue to educate, mobilize, and register voters in Arizona, despite the significant chilling effects of the law, Mi Familia Vota will have to divert resources from its other mission-critical work, both nationwide and within the state, to ensure that Latinx voters in Arizona can navigate the restrictions imposed by HB 2492 and know what to do if they are wrongly investigated and prosecuted. To that end, Mi Familia Vota will need to retain and recruit employees and volunteers and divert funds, time, and existing staff.

13. Because of the far-reaching effects of HB 2492, including the potential disenfranchisement of already registered voters and the risks of criminal investigation and prosecution, Mi Familia Vota's efforts to combat the law's effects will include Mi Familia Vota undertaking a massive media campaign aimed at educating voters about the law on both Spanish and English networks, to ensure all voters, including those who have previously registered to vote, are aware of HB 2492's requirements and potential consequences.

14. As Mi Familia Vota has never undertaken creating a large-scale English-language media campaign, Mi Familia Vota will not only need to spend resources to thoroughly understand the law and create an effective media campaign for both television and radio, but it will need to create this campaign in two different languages, tailor it to two different audiences, and identify and break into strategic English-media markets. This will cost Mi Familia Vota hundreds of thousands of dollars more than it spends on typical voter education and outreach campaigns. This campaign will also be accompanied by related

social media campaigns, further increasing the overall costs and resources Mi Familia Vota must expend.

15. HB 2492 and the massive educational outreach and media efforts Mi Familia Vota will need to undertake as a result, will accordingly require Mi Familia Vota to divert critical resources that it would otherwise spend to register thousands of more voters in Arizona alone, growing the electorate, and to motivate those voters to turn out to vote once registered, especially newly eligible voters who just recently turned 18. Because of HB 2492, Mi Familia Vota's mission of not just educating and registering voters, but of mobilizing voters and actually getting them to the polls, will be severely impeded. Many of Mi Familia Vota's ordinary activities will not be able to be supported at all, due to the diversion of resources needed to combat HB 2492 and its effects.

16. Moreover, due to the sensitive nature of the citizenship documents HB 2492 requires, Mi Familia Vota will also need to develop a plan to securely review registrants' documentation to ensure compliance with the statute. These unprecedented efforts will cost Mi Familia Vota tens of thousands of dollars in training staff and volunteers and in creating secure IT infrastructures for Mi Familia Vota to handle such sensitive information for the communities it serves. It is impossible to quantify all the costs and resources Mi Familia Vota will need to expend to ensure the communities it serves will trust it with this information. But such an effort is necessary so that Mi Familia Vota can ensure that voters are properly registered and not at risk of criminal investigation and prosecution.

17. Additionally, Mi Familia Vota will need to develop new training materials to educate its employees and volunteers about HB 2492's requirements. Mi Familia Vota will then need to expend significant resources retraining its employees and volunteers with these new materials.

18. For all of these reasons, HB 2492 imposes a severe burden on Mi Familia Vota, its employees and volunteers, and its constituents. HB 2492 will make it more costly and time-consuming for Mi Familia Vota to achieve its mission, chill Mi Familia Vota's

engagement with its constituents, undermine Mi Familia Vota's efforts to politically engage and empower that constituency, and subject Mi Familia Vota's constituents to potential wrongful investigation and prosecution.

19. Mi Familia Vota does not have unlimited resources, so putting more money towards all of the efforts described above, which follow from HB 2492, necessitates that it spend less on its campaigns to mobilize voters in Arizona and takes away from its efforts in other states to mobilize, register, and educate voters.

20. Through its significant direct harms on Mi Familia Vota's organizational mission and the additional resources it will force Mi Familia Vota to spend, HB 2492 greatly harms Mi Familia Vota and the voters it serves.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 14, 2022

Carolina Rodriguez-Greer

Carolina Rodriguez-Greer

State Director, Mi Familia Vota

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UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Mi Familia Vota, et al.,

Plaintiffs,

v.

Katie Hobbs, et al.,

Defendants.

Living United for Change in Arizona, et al.,

Plaintiffs,

v.

Katie Hobbs,

Defendant,

and

State of Arizona, et al.,

Intervenor-Defendants.

Case No. 2:22-cv-00509-SRB

DECLARATION OF AMEER PATEL

Poder Latinx,

Plaintiff,

v.

Katie Hobbs, et al.,

Defendants.

United States of America,

Plaintiff,

v.

State of Arizona, et al.,

Defendants.

Democratic National Committee, et al.,

Plaintiffs,

v.

State of Arizona, et al.,

Defendants,

and

Republican National Committee,

Intervenor-Defendant.

DECLARATION OF AMEER PATEL

I, Ameer Patel, according to 28 U.S. § 1746, hereby state:

1. My name is Ameer Patel. I am over 18 years of age, am competent to testify, and declare the following facts based on my personal knowledge.

2. I am currently employed as the Vice President of Programs of Voto Latino, a nonprofit corporation organized under section 501(c)(4) of the Internal Revenue Code. I have been in this position since September of 2019. My duties require me to be knowledgeable about Voto Latino's voting and voter-registration activities. I am also familiar with Voto Latino's resource-allocation decisions.

3. Voto Latino is the largest Latinx advocacy organization in the nation. Its mission is to educate, empower, and grow political engagement in historically underrepresented communities, especially its core constituency: Latinx voters. In 2020, Voto Latino, along with its sister organization, Voto Latino Foundation, Inc. (a non-profit, non-partisan 501(c)(3) organization), successfully registered over 650,000 voters nationwide. From 2017 to 2020, Voto Latino registered over 50,000 new voters in Arizona alone. Countless of the individuals Voto Latino assisted in Arizona registered using the Federal Form and were not required to submit documentary proof of citizenship, and have voted by mail in previous elections. Voto Latino considers eligible Latinx voters in Arizona to be a core constituency.

4. To further its mission, Voto Latino spends significant resources, both nationally and in Arizona, on voter education, registration, and mobilization initiatives. This includes efforts to educate voters on the voting process for elections in their state, encourage voters to vote, remind them (and show them how) to update their voter registrations, and inform them about (and help them utilize) available means of voting, such as early voting and voting by mail. These initiatives take the form of voter registration drives, email and

social media campaigns, paid online advertising, Get-Out-The-Vote campaigns, collaborations with strategic partners, and phone and text banking, among others.

5. The cost of carrying out these initiatives is significant. For the 2022 election cycle, Voto Latino's programs in Arizona alone, as of the date of this filing are expected to exceed $2 million. Voto Latino expects to continue making expenditures in the millions of dollars to continue its critical initiatives to educate, register, mobilize, and turn out Latinx voters across the United States, including in Arizona.

6. In fact, Arizona is one of Voto Latino's highest priority states. In 2020, Voto Latino and Voto Latino Foundation, Inc. collected over 50,000 unique voter registration applications in Arizona. There are currently approximately 650,000 unregistered Latinx voters in Arizona, and the largest bloc of Latinx voters in Arizona are young voters (age 18-29). Voto Latino currently has over 200 volunteers active in the state.

7. Given the importance of Arizona to Voto Latino carrying out its mission, Arizona's House Bill ("HB") 2492 will significantly frustrate its mission and harm the organization. Voto Latino will be forced to divert money, personnel, time, and resources away from its other mission-critical education, mobilization, and registration initiatives, both in Arizona and nationally, toward efforts to ensure that Latinx voters in Arizona can navigate the restrictions imposed by HB 2492.

8. I am aware of HB 2492's proof of citizenship requirements, which based on my understanding of the law will prohibit new registrants who register using the Federal Form from voting in presidential elections or by mail for any office unless they provide independent documentary proof of citizenship and prohibit currently registered voters who registered using the Federal Form without providing independent documentary proof of citizenship from voting in presidential elections or by mail for any office. I am also aware that the law goes into effect on January 1, 2023.

9. The proof of citizenship requirement frustrates Voto Latino's ability to fulfill its mission by making it harder for eligible voters to register to vote, creating barriers for

already lawfully registered voters to exercise their right to vote, making vote by mail and voting for certain offices harder to do, and confusing voters with convoluted registration requirements. All of these roadblocks independently and collectively have the potential to dissuade voters from exercising the right to vote. This is especially true for Voto Latino's core population, Latinx voters, as, in Voto Latino's experience, Latinx voters are more likely to be naturalized citizens than non-Latinx voters (and therefore more likely to be impacted by HB 2492's requirements), are less likely to be fluent English speakers, and are more likely to be from underserved communities.

10. Moreover, early voting and voting by mail are of great importance to the Latinx community in Arizona. In addition to its voter registration work, Voto Latino has focused its Get-Out-The-Vote efforts on increasing Latinx vote-by-mail and early-vote turnout. HB 2492 targets vote by mail, jeopardizing a significant aspect of Voto Latino's strategy in furtherance of its mission. Because HB 2492's proof of citizenship requirements threaten to disenfranchise individuals by preventing them from voting by mail without any clarity as to what notice, if any, voters will be given, HB 2492 threatens Voto Latino's constituents' fundamental rights and strike at the heart of the organization's mission to grow the political engagement of the Latinx community.

11. To guarantee that Voto Latino can continue to educate, mobilize, and register voters in Arizona, it will have to divert resources from its other mission-critical work, both nationwide and within the state, to ensure that Latinx voters in Arizona can navigate the restrictions imposed by HB 2492 and counteract any potential chilling effects or disenfranchisement HB 2492 may produce. To this end, Voto Latino will need to retain and recruit employees and volunteers and divert funds, time, and existing staff. This will include expending staff time and money seeking to acquire data on individuals who will lose their right to vote by mail and vote in presidential elections due to the proof of citizenship requirement and working to ensure that voters who can no longer vote by mail are aware of this limitation and are still able to exercise the franchise.

12. Voto Latino will also need to rethink the way it carries out its voter registration work. Voto Latino has no way to verify a voter's citizenship status and lacks the infrastructure to securely collect and verify citizenship documents from voters. It will therefore be unable to help voters ensure that they have the proper documentation they need to comply with the new law, making it harder for them to ensure that they are helping voters at every stage of the registration process. It will also, for the first time ever, need to divert money and time to gather and educate voters on the resources available for attaining citizenship verification documents for those voters who have lost or no longer have access to the forms that satisfy HB 2492's requirements.

13. Instead of continuing to use its resources on existing social media campaigns for voter engagement and mobilization, both nationally and in Arizona, Voto Latino will need to create brand new educational campaigns on the new process to register to vote in Arizona. This will include creating campaigns for voters who Voto Latino has *already* registered to vote, but who may be at risk of nevertheless being disenfranchised by HB 2492 because they did not provide proof of citizenship when they registered. But for HB 2492, Voto Latino would be using its resources to mobilize and encourage these voters (who Voto Latino already spent money and resources educating and registering to vote) to go to the polls, instead of dedicating resources towards asking these voters to once again ensure that they are properly registered. Because Voto Latino seeks not only to register voters but to then mobilize those voters to vote, HB 2492 will frustrate a critical part of Voto Latino's mission.

14. Moreover, when Voto Latino conducts its mobilization and GOTV efforts it will be unable to know who was previously registered using the federal form versus the state form. Voto Latino will therefore need to either develop separate mobilization and GOTV campaigns for federal form and state form voters, although it would likely be practically impossible to target voters based on which form they completed, or instead

revise its mobilization and GOTV efforts to account for the fact that some of the voters it is reaching may be unable to vote by mail or in presidential elections.

15. Relatedly, it costs Voto Latino more, per voter, to register voters in Arizona than in almost any other state. Because of HB 2492, these costs will only get higher. Money and resources that could have gone towards registering more voters in Arizona and in other states will instead be dedicated towards registering less voters in Arizona.

16. Voto Latino will also need to develop new training materials to educate its employees and volunteers about HB 2492's requirements. Voto Latino will then need to expend significant resources retraining its employees and volunteers with these new materials.

17. I am also aware of HB 2492's Attorney General referral requirements, which as I understand requires county recorders to research the citizenship of any voter who submits a Federal Form and (in addition to prohibiting them from voting in any election if the county recorder cannot determine they are a citizen) refer them to the county attorney and Attorney General for investigation. My understanding is that HB 2492 also requires the Secretary of State and county recorders to provide a list to the Attorney General of any voters who are registered to vote without what the statute deems satisfactory proof of citizenship and requires the Attorney General's office to investigate the citizenship of these individuals, report their findings, and prosecute any individuals they believe are not citizens.

18. HB 2492's Attorney General referral requirements are likely to have a chilling effect on eligible voters' willingness to access the franchise because voters may fear wrongful investigation and prosecution and therefore choose to not risk registering to vote. This is especially true for Voto Latino's constituents as historically underrepresented communities, like Latinx communities, tend to have more negative relationships with and to be more fearful of law enforcement.

19. To counteract the harms imposed by the Attorney General referral requirements, Voto Latino will need to divert further resources to educate voters on the

law's requirements and what to do if they are wrongly investigated and prosecuted. This will be a first for Voto Latino, which has never had to contend with how to best educate and mobilize voters in Arizona when some who register face the potential of criminal investigation and prosecution.

20. Voto Latino will also need to allocate resources towards investigating which databases county recorders will be using to verify voters' citizenship status and towards assisting voters in navigating how to ensure said databases contain accurate information. This is time and money Voto Latino would otherwise be spending on achieving its goal of increasing the Latinx voting share across key states, including Arizona.

21. Moreover, from its efforts in other states, Voto Latino has seen firsthand that it is harder to recruit and keep volunteers when a voting statute or requirement carries with it the potential for criminal investigation and prosecution. Voto Latino relies on volunteer work to further its mission and will therefore have to dedicate more resources to recruiting and keeping volunteers than it has in the past in Arizona.

22. For all of these reasons, HB 2492 imposes a severe burden on Voto Latino, its employees and volunteers, and its constituents. HB 2492 will make it more costly and time-consuming for Voto Latino to achieve its mission, chill Voto Latino's engagement with its constituents, undermine its efforts to politically engage and empower that constituency, and subject its constituents to potential wrongful investigation and prosecution.

23. The only way for Voto Latino to mitigate these harms will be to expend more resources (including both staff time and money) on its voter registration and voter education efforts in Arizona. Voto Latino does not have unlimited resources, so putting more money towards these efforts necessitates that it spend less on its campaigns to mobilize voters in Arizona and also takes away from its efforts in other states to mobilize, register, and educate voters.

24. Through its significant direct harms on Voto Latino's organizational mission and the additional resources it will force Voto Latino to spend, HB 2492 greatly harms Voto Latino and the voters it serves.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 14, 2022

Ameer Patel

Ameer Patel
Vice President of Programs, Voto Latino