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UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

American Encore, an Arizona non-profit corporation; Karen Glennon, an Arizona individual; America First Policy Institute, a non-profit corporation,

Plaintiffs,

v.

Adrian Fontes, in his official capacity as Arizona Secretary of State; Kris Mayes, in her official capacity as Arizona Attorney General; Katie Hobbs, in her official capacity as Governor of Arizona,

Defendants.

No. CV-24-01673-PHX-MTL

ATTORNEY GENERAL'S REPLY IN SUPPORT OF MOTION TO DISMISS COUNT 2 OF THE COMPLAINT WITH PREJUDICE

The Secretary does not have the power to amend or expand criminal statutes by removing the mens rea or otherwise. He does not have the power to create new crimes that apply to everyone in Arizona all of the time, much less blatantly unconstitutional crimes that ban protected speech by the public. And, the Attorney General cannot prosecute people under laws that do not apply to them. No one disputes any of this.

Yet, with Count 2, Plaintiffs ask this Court for a constitutional ruling about a provision of the EPM, Chapter 9, section III(D), that—as Defendants have repeatedly and unequivocally disavowed—does not regulate Plaintiffs or put them in any jeopardy of prosecution under A.R.S. § 16-452(C) whatsoever. Further, Plaintiffs seek that constitutional ruling based on an a-textual interpretation of section III(D) that everyone agrees would exceed the Secretary's statutory authority if it meant what Plaintiffs say it means. If nothing else, that undisputed statutory basis alone resolves this case, to say nothing of bedrock principles of constitutional avoidance. So, why are we here?

We should not be—there is no controversy save for Plaintiffs' say-so, which is flat wrong as a matter of law in multiple respects. This Court should dismiss.[1]

I. Section III(D) of the EPM does not regulate Plaintiffs, but it does serve other important purposes that protect the safety and security of elections.

Plaintiffs do not dispute that they lack standing (and that Count 2 fails) if section III(D) does not regulate them, nor could they. *E.g.*, Doc. 47 at 13. Thus, the Attorney

[1] Plaintiffs filed a 47-page brief (Doc. 47) combining their responses to Defendants' motions to dismiss (Docs. 31, 33) with their replies in support of their preliminary injunction motions (Docs. 14, 26). The Court is well aware of the procedural order of operations here, the distinct standards for analyzing those distinct motions, and the materials the Court can consider in evaluating each. *Cf. e.g.*, *Our Watch with Tim Thompson v. Bonta*, 682 F. Supp. 3d 838, 845 (E.D. Cal. 2023) ("Because defendant's motion to dismiss raises questions with respect to this court's subject matter jurisdiction over this action, the court will first address defendant's motion to dismiss before addressing plaintiff's motion for preliminary injunction.").

Accordingly, the Attorney General focuses on the allegations of the Complaint and relevant law, and need not respond to everything in Plaintiffs' "consolidated" document, including the evidentiary and extra-record citations; declining to do so is in no way a concession that Plaintiffs' assertions are accurate or meritorious.

General again starts with the threshold legal question of what section III(D) means. Plaintiffs' arguments in support of their erroneous reading fail in two primary ways.

A. Plaintiffs' method of interpretation ignores the plain text.

Plaintiffs apply a demonstrably absurd form of textual interpretation. To illustrate, imagine that the following hypothetical heading, subheading, and provision appear in an EPM Chapter titled, "Conduct of Elections/Election Day Operations":

> **Section I. Election Worker Dress Code.**
>
> **A. Apparel.**
>
> Campaign-affiliated apparel and apparel with political messages are prohibited. A.R.S. § 16-515(F). Any person must wear a green hat with the official seal of the state, county, or city or town. The officer in charge of elections has a responsibility to train poll workers regarding the appropriate dress code.

Using the exact same "plain-text reading" Plaintiffs use here, that hypothetical EPM provision requires *everyone* in Arizona to wear a green hat all of the time because "'any person' is a [requirement] applicable to any person," and it "contains a limitless geographic and temporal scope." Doc. 47 at 10, 16.

And, under Plaintiffs' theory, the first sentence amends A.R.S. § 16-515(F)—which on its face only restricts election officials and party representatives—and makes it a prohibition applicable to *all* Arizonans, forbidding them from wearing political apparel anywhere. The provision necessarily expands the statute, Plaintiffs would say, because it does not fully quote the language of § 16-515(F), and the word "'prohibit' unambiguously means 'to forbid' or 'officially refuse to allow something.'" Doc. 47 at 14. Thus, according to Plaintiffs' interpretive approach, any Arizonan can now be prosecuted under A.R.S. § 16-452(C) at any point for wearing political apparel or not wearing a green hat because "any provision of the EPM" is a rule, and "the EPM has the force of law." *Id.*

To get to that interpretation though, one must ignore that the chapter title, preceding headings, and surrounding text are clearly addressed to election officials. Just like with Chapter 9, section III(A)-(D). *See* Doc. 16-2 at 3, 188-97.

One must ignore that the text of A.R.S. § 16-515(F) clearly restricts only "an election official, a representative of a political party, [and an authorized] challenger," which does not change simply because the statute also says "*[a]ny person* violating this section is guilty of a class 2 misdemeanor." A.R.S. § 16-515(H) (emphasis added). Clearly, the words "[a]ny person" must be read in context and refer only to the people that section regulates. The same is true here: the relevant voter intimidation, coercion, and harassment statutes all specify the conduct they prohibit and the necessary mens rea. *See* A.R.S. §§ 16-1013, 16-1017, 13-2921. And the EPM's section III(D) does not amend or expand the scope of those statutes simply because it does not fully quote their statutory language, nor because § 16-452(C) refers to "[a] person."[2]

In addition, one must ignore that the last sentence in the very same hypothetical provision confirms the intended audience and reason for paraphrasing the relevant law (i.e., to inform required training), just as section III(D) does. *See* Doc. 16-2 at 195-96. But, as Plaintiffs would say: "By its plain text, the [hypothetical Apparel Provision] explicitly applies to anyone that is a 'person'—which means ordinary members of the public just as much as election officials." Doc. 47 at 15. In Plaintiffs' eyes, all other surrounding text, context, and normal principles of construction are just noise.

In this same way, anyone could take any number of unambiguous EPM provisions out of context and turn them into generally applicable criminal laws. Thus, "Write-in candidates are prohibited" turns into a prohibition on any voters ever writing in a candidate, even though the chapter and section are expressly related to eligibility to participate in the Presidential Preference Election. Doc. 16-2 at 136. Or, perhaps the hypothetical Apparel Provision is not so hypothetical after all. The provision "Observers may not wear … any materials that identify or express support or opposition for a political

[2] Relatedly, section III(D)'s language "inside or outside the 75-foot limit at a voting location" merely reflects the scope of the statutory prohibitions against voter intimidation, coercion, and harassment. Doc. 16-2 at 195. The EPM's description of those laws does not convert the description *itself* into a statewide prohibition. *Contra* Doc. 47 at 16.

party….” does not limit who the “observers” are. Doc. 16-2 at 154. So, in Plaintiffs’ telling, it must apply to any and all onlookers without limitation.

Plaintiffs’ theory and interpretation of section III(D) are just as absurd as these examples. Indeed, their construction is even more specious given that the EPM expressly recognizes what Plaintiffs claim it lacks: it says that “persons [must be allowed] to engage in electioneering and other political activity in public areas … outside the 75-foot limit” so long as such “[e]lectioneering or political activity [does] not result in voter intimidation” and “access to parking spaces [is] not … blocked or impaired.” Doc. 16-2 at 144; *cf. Yates v. United States*, 574 U.S. 528, 543 (2015) (relying on principle that “a word is known by the company it keeps—to ‘avoid ascribing to one word a meaning so broad that it is inconsistent with its accompanying words’” (citation omitted)). But Plaintiffs simply ignore this part of the EPM too.

In other words, with any willingness to read the EPM as a whole and in context (and with any lick of common sense), it is implausible to read section III(D)—which repeatedly refers to conduct “at a voting location” (Doc. 16-2 at 195-97)—as a blanket criminal prohibition applicable within “the entire territory of Arizona’s borders.” Doc. 47 at 16. And yet, Plaintiffs maintain that “is the only possible construction.” *Id.*

Importantly, this Court is not bound to repeat the superior court’s legal errors in the parallel state case.[3] The court’s analysis there further illustrates Plaintiffs’ same erroneous method of misconstruing the EPM. In sum, the superior court found that all of “the EPM applies to all Arizonans, not just those professionally involved with elections,”

[3] Plaintiffs vigorously opposed abstention as to Count 2. Doc. 41. Nonetheless, although they urge this Court to continue its review, Plaintiffs cite the superior court’s ruling in the state case as a “well-reasoned decision,” suggesting that it should be persuasive here. Doc. 47 at 17-18. Plaintiffs cannot have it both ways. Either deference to the state courts is appropriate and this Court should abstain until those proceedings have concluded; or, Plaintiffs so desperately need to cover the waterfront to ensure they will obtain relief that this federal litigation must continue in parallel. But if Plaintiffs want this Court to proceed, then this Court should conduct an independent review and exercise its independent judgment; Defendants are entitled to that much if Plaintiffs insist on litigating essentially the same case in two forums.

based almost entirely on isolating the heading "Instructions to Voters and Election Officers" and the use of the words "you" and "your" in a different, unchallenged section of the EPM. Doc. 41-1 at 13-14. Even though that cited heading appears in a section specifically addressed to "the election board" and is about setting up "[u]pon arriving at the voting location." Doc. 16-2 at 188-89. And even though the words "you" and "your" appear in exemplar form "notices and signs" to voters that contain information which "must be displayed at the voting location"—again, all in the context of a section (and surrounded by other sections) with commands to election officials. Doc. 16-2 at 188-92.

B. Plaintiffs misunderstand the EPM and section III(D).

Plaintiffs' flawed interpretation of section III(D) flows, in part, from their misunderstanding of the EPM and relevant law generally. To start, Plaintiffs seem to believe that the Secretary can promulgate rules "to implement A.R.S. § 16-1013," a criminal statute. Doc. 47 at 15. The Secretary of State does not "promulgate guidance [or rules] applying" criminal laws, whatever Plaintiffs mean by that. Doc. 47 at 21-22.

At the same time, Plaintiffs also seem to think that *all* rules in the EPM are promulgated pursuant to A.R.S. § 16-452(A), and that the EPM is comprised only of rules. Doc. 47 at 14. That is why they misunderstand the language in A.R.S. § 16-452(C) "any rule adopted pursuant to this section" to mean "*i.e.*, *any* provision of the EPM." Doc. 47 at 14 (emphasis added). But there are several other statutes under which the Secretary promulgates rules in the EPM. *See, e.g.*, A.R.S. §§ 16-168(I), 16-246(G), 16-411(B)(5)(b), 16-542(I), 16-542(A), 16-544(B). And only "rule[s] adopted pursuant to [subsection (A) in § 16-452]" can form the basis of a prosecution under § 16-452(C).

Further, not everything in the EPM is an enforceable rule, some of it is simply guidance to local election officials. *See McKenna v. Soto*, 481 P.3d 695, 699 ¶ 21 (Ariz. 2021). That latter distinction especially matters because Plaintiffs continue to believe that section III(D) either "applies to everyone" in Arizona or does nothing at all. Doc. 47 at 15, 19-20. Those are not the only two options.

Section III(D) contains a mixture of guidance and rules that apply to election

officials. *See* Doc. 16-2 at 195-97. For example, here's a clear command: "The officer in charge of elections has a responsibility to train poll workers and establish policies to prevent and promptly remedy any instances of voter intimidation." Doc. 16-2 at 195. If the officer failed to establish such training and policies, he would be violating an express instruction.

Here's another: "The inspector must utilize the marshal to preserve order and remove disruptive persons from the voting location." Doc. 16-2 at 196. An inspector might have some fact-specific discretion as to when "order" is threatened or when a person becomes "disruptive" and requires removal. But if disruptive persons were undermining order and the inspector took no action, or if the inspector called in a private militia to manage the voting location instead of "utiliz[ing] the marshal," he would be violating an express instruction.

What Plaintiffs challenge (the first part of the introductory paragraph on page 181 and the illustrations of possible factors to consider on page 182-83) is guidance. *See* Doc. 16-2 at 195-97. Those parts of section III(D) simply explain to lay election officials what kind of conduct "may" be considered intimidating and disruptive, as the Attorney General explained in her Motion to Dismiss. Doc. 31 at 3-8. Those illustrations, and the brief paraphrase of the general legal principles that precedes them, are intended to guide election officials who are required to preserve safety and order at the polls, thus ensuring that voters can securely exercise their constitutionally guaranteed franchise.

For example, imagine that an elections officer saw a man just "outside the 75-foot limit at a voting location" who was shaking a woman's shoulders and could be heard saying, "you better vote for him, or else." Or imagine that a heated group of supporters for a particular candidate formed a large circle around the voting location just outside the 75-foot limit, with only a couple of feet of space between each person for voters to pass. Out of concern that they were witnessing *possible* "instances of voter intimidation," threats, or harassment within the meaning of Arizona's statutes, the "inspector and/or marshal [might very well] use [their] sound judgment … to contact law enforcement" in

those situations. Doc. 16-2 at 195-96. And the law is even more protective within the 75-foot limit.

But for any of these or other examples, calling the police or asking disruptive people to desist or leave is not election officials exercising "enforcement power against the public" or enforcing a "prohibition on speech and expressive conduct." Doc. 47 at 19.[4] Those officials would simply be fulfilling *their* duty that the EPM imposes on *them*: they are charged with preserving order and safety, not enforcing criminal laws. Plaintiffs continue to repeat this idea that "law enforcement cannot be called when there is no law to enforce." Doc. 47 at 45. But that's nonsense.

Stepping outside the EPM context, imagine that Congress requires the Transportation Security Administration to promulgate a handbook of rules for TSA agents and airport security officers to ensure consistent safety standards. The TSA's handbook then includes certain instructions, requires the creation of training about federal laws, and lists examples of behaviors that might be signs of criminality—such as leaving a bag unattended—to guide agents and officers in determining whether they should elevate a concern to other authorities. Plainly, that handbook itself is not a criminal prohibition on passengers who leave a bag unattended. And its guidance to federal and state agents about when action might be appropriate does turn it into a "binding prohibition[]." Doc. 47 at 45. It is guidance that includes descriptions of other binding laws.

Back to this case. As far as ordinary voters and members of the public are concerned, Arizona's election and general criminal statutes are the only source of law that bind them on this subject, and the police and prosecutors are the actors with criminal enforcement power. Never before has anyone had any trouble understanding this, nor has any voter feared prosecution under A.R.S. § 16-452(C) for "violating" commands and

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[4] Importantly, as the Attorney General's Motion to Dismiss explained (Doc. 31 at 17-18), this not actually Plaintiffs' claim. They do not allege that they will be asked to leave a voting location or told to leave as a result of some election officials' interpretation of section III(D). Their claim is based *solely* on the theory that they will be prosecuted under A.R.S. § 16-452(C) for violating the EPM's section III(D).

guidance directed solely at election officials. Plaintiffs do not believe that section III(D) requires them to create training for election workers or use the marshal to preserve order; it's not clear why they believe the rest of section III(D) applies to them either.

If section III(D) excluded the guidance that Plaintiffs challenge, it would have no real world or legal effect on Plaintiffs at all. Those parts of the section do not regulate them now—and therefore do not "prohibit[] something that the underlying statutes [do] not"—and the underlying statutes that *do* regulate them would still be in place. Doc. 47 at 20. But removing that guidance *would* make section III(D) far less useful to election officials trying to carry out the EPM's commands to *them* to preserve order.

Although they would be lacking that helpful guidance, those election officials would still have the same "responsibilities for preserving order and security." Doc. 47 at 20. Thus, presumably, those officials would take the same kinds of actions as necessary (i.e., asking disruptive people to leave, calling law enforcement). But without section III(D)'s practical guide and explanation, officials might take necessary action too infrequently, to the detriment of the voters. And in all events, lay election officials could very well be confused about why their duties to preserve order and the underlying statutes are still in place and constitutional, but the non-binding guidance that helped them do their jobs is suddenly unconstitutional and cannot be considered.

That possibility—which is not at all unlikely, especially in this charged climate and given the events of the past few years—is why Defendants defend section III(D) and have sought a stay. Defendants do not seek to "enforce" something against Plaintiffs. They seek to preserve guidance for election officials and rebut an erroneous reading of the EPM that poses no threat to Plaintiffs but does pose a threat to voter safety.

II. Plaintiffs lack standing as a matter of law under Rule 12(b)(1).

Plaintiffs initially recognize that whether section III(D) regulates them is a pure legal issue that this Court answers for itself. Doc. 47 at 13. But then Plaintiffs pivot and say that "this Court must accept Plaintiffs' interpretation of [section III(D)] for standing

purposes." Doc. 47 at 29. They had it right the first time.[5]

"'The jurisdictional question of standing precedes, and does not require, analysis of the merits.' … But 'this is not to say that a plaintiff may rely on a bare legal conclusion to assert injury-in-fact.'" *Hart v. Kennedy*, No. CV-19-08111-PCT-GMS, 2019 WL 3767005, at *1 (D. Ariz. Aug. 9, 2019) (citations and original alterations omitted). Plaintiffs' interpretation that section III(D) regulates them is a pure legal conclusion. And courts do not "credit legal conclusions" as true, *Maya v. Centex Corp.*, 658 F.3d 1060, 1067 (9th Cir. 2011), or allow plaintiffs to "rely on a bare legal conclusion to assert injury-in-fact," *Daniel v. Nat'l Park Serv.*, 891 F.3d 762, 767 (9th Cir. 2018) (citation omitted).

Indeed, it is flatly incorrect that "this Court must accept Plaintiffs' interpretation of [section III]" to assess their standing. Doc. 47 at 29. A plaintiff cannot "establish standing simply by claiming that they experienced a 'chilling effect' that resulted from a governmental policy *that does not regulate, constrain, or compel any action on their part*." *Clapper v. Amnesty Int'l USA*, 568 U.S. 398, 419 (2013) (emphasis added). And therefore, the Ninth Circuit has repeatedly found "a plaintiff has not established an injury in fact where the statute 'clearly fails to cover [his] conduct.'" *Lopez v. Candaele*, 630 F.3d 775, 788 (9th Cir. 2010) (citation omitted, citing cases).

If Plaintiffs were correct, then courts would not require plaintiffs to establish "a credible threat of enforcement" for pre-enforcement standing, or ever need to inquire into "whether the [challenged] law even applies to the plaintiff," as they routinely do under these circumstances. *Italian Colors Rest. v. Becerra*, 878 F.3d 1165, 1171-72 (9th Cir. 2018); *see also, e.g.*, *Christian Action League of Minn. v. Freeman*, 31 F.4th 1068, 1072 (8th Cir. 2022) ("So this appeal turns on a single question: is CAL's planned conduct criminalized by the Statute? If … the Statute doesn't prohibit CAL's conduct, then CAL isn't affected by the Statute and has no injury in fact.").

[5] Strangely, Plaintiffs cite A.R.S. § 12-910(F). Doc. 47 at 13. That statute does not apply here; it "applies in any action for judicial review of any agency action" when state courts are "reviewing the administrative record and … evidence presented."

This blackletter law is no less applicable in the First Amendment context, where still, a plaintiff's "naked assertion that its speech has been chilled is 'a bare legal conclusion' upon which it cannot rely to assert injury-in-fact." *Twitter, Inc. v. Paxton*, 56 F.4th 1170, 1175 (9th Cir. 2022). "Even in the First Amendment context, a plaintiff must show a credible threat of enforcement." *Italian Colors*, 878 F.3d at 1171.

To illustrate, if a legislature passed a statute requiring all tomato farmers to affix a certain label and message to their products, *poultry* farmers would not have standing to challenge that law as compelled speech under the First Amendment on the basis that they feared prosecution for not complying. The law would not apply to them, and a court should not credit their erroneous legal conclusion to the contrary in order to reach the constitutional merits, especially if "the enforcing authority expressly interpreted the challenged law as not applying to the plaintiffs' activities." *Lopez*, 630 F.3d at 788.[6]

Thus, Defendants do not "argue that Plaintiffs must confess to violating the law to establish standing." Doc. 47 at 30. To the contrary, Defendants are urging Plaintiffs to understand that Plaintiffs *cannot* violate section III(D) because it does not regulate them, and therefore they have no credible fear of prosecution under A.R.S. § 16-452(C).[7] Plaintiffs cite no authority for the proposition that they can ignore this lack of any real threat and Defendants' "disavowal[s] [as] premised on clear legal errors." Doc. 47 at 30.

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[6] *FEC v. Ted Cruz for Senate*, 596 U.S. 289 (2022), on which Plaintiffs rely (Doc. 47 at 27), is distinguishable because there was no dispute that the challenged law could apply to the plaintiffs. *See id.* at 297-98. Indeed, "the FEC[] [had] threatened enforcement of the provisions" plaintiffs challenged. *Id.* at 297. The Court simply held that there was not a lack of traceability when plaintiffs voluntarily took actions that implicated a statute that applied to them. *Id.* at 296-97. Notably though, the Court reiterated the principle from *Clapper*—which is actually relevant here—that a plaintiff cannot "manufacture standing by voluntarily" incurring costs when "they [can]not show that they had been or were likely to be subjected to [the challenged] policy." *Id.* at 297. This is why Plaintiffs' so-called "compliance costs" do not confer standing here.

[7] Plaintiffs say that "AFPI could not have incurred compliance costs in the 2020 election cycle or challenged the 2019 EPM's [section III(D)]" because it was not formed until 2021. Doc. 47 at 27-28. But that is inconsistent with Plaintiffs' fundamental premise that section III(D) is a prohibition that applies to everyone all of the time, and is not limited to elections or voting locations.

III. Count 2 fails to state a claim for relief under Rule 12(b)(6).

Plainly, "[a] regulation that purports to prohibit speech" based on nothing more than "insulting or offensive language" or "raising one's voice"—and without a mens rea to boot—would be unconstitutional. Doc. 47 at 12. Defendants would have no desire or basis to defend such a law against the people they serve.

Although Plaintiffs continue to repeat those sorts of basic, undisputed speech and due process principles, they simply have nothing to do with this case. Section III(D) is not a blatantly unconstitutional regulation and does not purport to be a regulation of any sort on members of the public like Plaintiffs. Defendants would be glad to resolve this case by stipulating that section III(D) does not and cannot regulate Plaintiffs or ordinary voters and members of the public, and does not and cannot amend or expand criminal statutes—if only Plaintiffs would accept that. But Plaintiffs will not; instead, they insist on an unconstitutional reading that would allow the prosecutions they purport to fear.

For all the reasons discussed, the Attorney General is reluctant to engage in an unnecessary constitutional analysis of section III(D) as if it were a statute that binds or regulates Plaintiffs. But even if it were, Plaintiffs' overbreadth challenge would fail because section III(D) would plainly have a legitimate constitutional sweep; it simply provides guidance regarding the relevant voter intimidation, coercion, and harassment statutes, and does not purport to do or prohibit anything more—in other words, "the Venn Diagram" Plaintiffs imagine is just a circle. Doc. 47 at 20.[8]

As explained, the Court should construe section III(D) to avoid these unnecessary constitutional issues, *see, e.g.*, Doc. 31 at 8, and dismiss Count 2 with prejudice.[9]

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[8] For accuracy's sake, Defendants note that the phrase "compelling interest[s]" *is* in their briefing (Doc. 31 at 18:14), contrary to Plaintiffs' assertions (Doc. 47 at 45). But that really is neither here nor there, given that section III(D) is not a criminal prohibition.

[9] Plaintiffs' arguments (Doc. 47 at 47) about Count 1 against the Attorney General seem to be based primarily on the same "approval" theory that was inadequate to keep the Governor in this case. In any event, the Attorney General continues to join in the Secretary's arguments as to why Count 1 fails to state a claim.

RESPECTFULLY SUBMITTED this 5th day of September, 2024.

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