

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

LEAGUE OF UNITED LATIN AMERICAN
CITIZENS, *et al.*,

Plaintiffs,

v.

EXECUTIVE OFFICE OF THE PRESIDENT, *et al.*,

Defendants.

Civil Action No. 25-0946 (CKK)

**[PROPOSED] ANSWER
BY THE REPUBLICAN NATIONAL COMMITTEE
TO THE LULAC PLAINTIFFS' COMPLAINT**

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**pro hac vice forthcoming*

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The Republican National Committee*

Proposed Intervenor—the Republican National Committee—now answers Plaintiffs’ complaint. Unless expressly admitted below, every allegation in the complaint is denied. Accordingly, the Republican National Committee states:

INTRODUCTION

1. Intervenor admits that the President issued the Executive Order on March 25, 2025. The Executive Order speaks for itself. The remaining allegations in this paragraph are denied.
2. Deny.
3. Intervenor admits that Plaintiffs have filed this action but otherwise denies the remaining allegations in this paragraph.
4. Deny.

JURISDICTION AND VENUE

5. Intervenor admits that Plaintiffs have filed their action under the cited provisions of federal law but denies that Plaintiffs have any valid claim under these laws.
6. Intervenor lacks sufficient information to admit or deny the allegations made in this paragraph.

PARTIES

7. Intervenor lacks sufficient information to admit or deny the allegations made in this paragraph.
8. Intervenor lacks sufficient information to admit or deny the allegations made in this paragraph.
9. Intervenor lacks sufficient information to admit or deny the allegations made in this paragraph.

10. Intervenor lacks sufficient information to admit or deny the allegations made in this paragraph.

11. Intervenor lacks sufficient information to admit or deny the allegations made in this paragraph.

12. Intervenor lacks sufficient information to admit or deny the allegations made in this paragraph.

13. Intervenor lacks sufficient information to admit or deny the allegations made in this paragraph.

14. Intervenor lacks sufficient information to admit or deny the allegations made in this paragraph.

15. Intervenor lacks sufficient information to admit or deny the allegations made in this paragraph.

16. Intervenor lacks sufficient information to admit or deny the allegations made in this paragraph.

17. Intervenor lacks sufficient information to admit or deny the allegations made in this paragraph.

18. Intervenor lacks sufficient information to admit or deny the allegations made in this paragraph.

19. The cited statute speaks for itself. Intervenor otherwise lacks sufficient information to admit or deny the allegations made in this paragraph.

20. Intervenor lacks sufficient information to admit or deny the allegations made in this paragraph.

21. Intervenor lacks sufficient information to admit or deny the allegations made in this paragraph.

22. Admit.

23. The cited statutes speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

24. Admit.

25. Admit.

26. Admit.

27. Admit.

28. Admit.

29. Admit.

30. Admit.

31. Admit.

32. Admit.

33. Admit.

34. Admit.

FACTUAL ALLEGATIONS AND LEGAL BACKGROUND

35. Admit.

36. Deny.

37. The cited Executive Order speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

38. The cited Executive Order speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

39. The cited Executive Order speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

40. The cited Executive Order speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

41. Intervenor lacks sufficient information to admit or deny the allegations in this paragraph.

42. Intervenor lacks sufficient information to admit or deny the allegations in this paragraph.

43. Intervenor lacks sufficient information to admit or deny the allegations in this paragraph.

44. The cited Executive Order speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

45. This paragraph consists of legal conclusions to which no response is required.

46. The cited Executive Order speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

47. The cited statutes speak for themselves. The remaining allegations in this paragraph are denied.

48. The cited Executive Order speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

49. The cited Executive Order speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

50. The cited Executive Order speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

51. The cited Executive Order speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

52. The cited Executive Order speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

53. The allegations in this paragraph are legal conclusions to which no response is required.

54. The allegations in this paragraph are legal conclusions to which no response is required.

55. The cited constitutional provisions speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

56. The cited authority speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

57. The cited authority speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

58. The cited Federalist Papers speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

59. The cited Federalist Papers speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

60. The cited statute speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

61. The cited statutes speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

62. The cited statute speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

63. The cited statute speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

64. The allegations in this paragraph are legal conclusions to which no response is required.

65. The cited statute speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

66. The cited statute speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

67. The cited statute speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

68. The cited statutes speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

69. The cited statutes speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

70. The cited statutes speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

71. The cited statute speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

72. The cited statute speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

73. The cited statutes speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

74. The cited statute speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

75. The cited statute speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

76. The cited statute speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

77. The allegations in this paragraph are legal conclusions to which no response is required.

78. The cited statute speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

79. The cited statutes and authority speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

80. The cited portions of the Congressional Record speak for themselves. Intervenor otherwise lacks sufficient information to admit or deny the allegations in this paragraph.

81. The cited regulations speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

82. The cited regulations speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

83. The cited authority and regulations speak for themselves. Intervenor otherwise lacks sufficient information to admit or deny the allegations in this paragraph.

84. The Executive Order speaks for itself.

85. Deny.

86. The allegations in this paragraph are legal conclusions to which no response is required.

87. The cited statute speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

88. The cited statute and authority speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

89. The cited statute and regulation speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

90. The cited authority speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

91. The cited statutes speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

92. The cited statutes speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

93. The cited statute speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

94. The cited authorities speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

95. The cited authority speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

96. The cited authorities speak for themselves. Intervenor otherwise denies the allegations in this paragraph.

97. The cited statute speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

98. The cited authorities speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

99. The cited authorities speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

100. The cited statute speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

101. The allegations in this paragraph are legal conclusions to which no response is required.

102. The allegations in this paragraph are legal conclusions to which no response is required.

103. The cited statute speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

104. The cited statutes and regulation speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

105. The cited statute speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

106. The cited statutes speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

107. The cited Executive Order speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

108. The cited statute speaks for itself. The remaining allegations in this paragraph are denied.

109. The cited statute speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

110. The cited statutes and regulation speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

111. The cited authority and constitutional provision speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

112. The allegations in this paragraph are legal conclusions to which no response is required.

113. Intervenor admits the allegations in the first sentence of this paragraph but otherwise denies the allegations in the rest of this paragraph.

114. The allegations in this paragraph are legal conclusions to which no response is required.

115. The cited authority, statute, and Executive Order speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

116. Intervenor lacks sufficient information to admit or deny the allegations in this paragraph.

117. The cited statute speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

118. Intervenor lacks sufficient information to admit or deny the allegations in this paragraph.

119. Deny.

120. The cited statute and Executive Order speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

121. The allegations in this paragraph are legal conclusions to which no response is required.

122. The cited statute speaks for itself. The remaining allegations in this paragraph are denied.

123. Deny.

124. The Executive Order speaks for itself. The remaining allegations in this paragraph are denied.

125. The allegations in this paragraph are legal conclusions to which no response is required.

126. The cited Executive Order speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

127. The cited Executive Order speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

128. Deny.

129. The cited statutes speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

130. The cited statute speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

131. The cited statute speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

132. The cited statutes speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

133. The cited statute speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

134. The cited statutes speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

135. The cited Executive Order speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

136. Intervenor lacks sufficient information to admit or deny the allegations in this paragraph.

137. Intervenor lacks sufficient information to admit or deny the allegations in this paragraph.

138. Intervenor lacks sufficient information to admit or deny the allegations in this paragraph.

139. Intervenor lacks sufficient information to admit or deny the allegations in this paragraph.

140. The cited Executive Order speaks for itself. The remaining allegations in this paragraph are denied.

141. Intervenor lacks sufficient information to admit or deny the allegations in this paragraph.

142. Intervenor lacks sufficient information to admit or deny the allegations in this paragraph.

143. Intervenor lacks sufficient information to admit or deny the allegations in this paragraph.

144. Intervenor lacks sufficient information to admit or deny the allegations in this paragraph.

145. Intervenor lacks sufficient information to admit or deny the allegations in this paragraph.

146. Intervenor lacks sufficient information to admit or deny the allegations in this paragraph.

147. Intervenor lacks sufficient information to admit or deny the allegations in this paragraph.

148. Intervenor lacks sufficient information to admit or deny the allegations in this paragraph.

149. Intervenor lacks sufficient information to admit or deny the allegations in this paragraph.

150. Intervenor lacks sufficient information to admit or deny the allegations in this paragraph.

151. Intervenor lacks sufficient information to admit or deny the allegations in this paragraph.

152. The cited portion of the Congressional Record speaks for itself. Intervenor otherwise lacks sufficient information to admit or deny the allegations in this paragraph.

153. Deny.

154. Intervenor lacks sufficient information to admit or deny the allegations in this paragraph.

155. Intervenor denies the allegations in the first sentence of this paragraph but otherwise lacks sufficient information to admit or deny the allegations in the rest of this paragraph.

156. Intervenor lacks sufficient information to admit or deny the allegations in this paragraph.

157. The cited Executive Order speaks for itself. Intervenor otherwise lacks sufficient information to admit or deny the allegations in this paragraph.

158. Intervenor lacks sufficient information to admit or deny the allegations in this paragraph.

159. Intervenor lacks sufficient information to admit or deny the allegations in this paragraph.

160. Intervenor lacks sufficient information to admit or deny the allegations in this paragraph.

161. The Executive Order speaks for itself. Intervenor otherwise lacks sufficient information to admit or deny the allegations in this paragraph.

162. The Executive Order speaks for itself. Intervenor otherwise lacks sufficient information to admit or deny the allegations in this paragraph.

163. Intervenor lacks sufficient information to admit or deny the allegations in this paragraph.

164. Intervenor lacks sufficient information to admit or deny the allegations in this paragraph.

165. Intervenor lacks sufficient information to admit or deny the allegations in this paragraph.

166. The cited Executive Order speaks for itself. Intervenor otherwise lacks sufficient information to admit or deny the allegations in this paragraph.

167. The cited Executive Order speaks for itself. Intervenor otherwise lacks sufficient information to admit or deny the allegations in this paragraph.

168. Intervenor lacks sufficient information to admit or deny the allegations in this paragraph.

169. Intervenor lacks sufficient information to admit or deny the allegations in this paragraph.

170. Intervenor lacks sufficient information to admit or deny the allegations in this paragraph.

171. Intervenor lacks sufficient information to admit or deny the allegations in this paragraph.

172. Intervenor lacks sufficient information to admit or deny the allegations in this paragraph.

173. Intervenor lacks sufficient information to admit or deny the allegations in this paragraph.

174. Intervenor lacks sufficient information to admit or deny the allegations in this paragraph.

175. Intervenor denies the allegations in the first and last sentences of this paragraph. Intervenor otherwise lacks sufficient information to admit or deny the allegations in this paragraph.

176. Intervenor lacks sufficient information to admit or deny the allegations in this paragraph.

177. Intervenor lacks sufficient information to admit or deny the allegations in this paragraph.

178. Intervenor lacks sufficient information to admit or deny the allegations in this paragraph.

179. Intervenor lacks sufficient information to admit or deny the allegations in this paragraph.

180. Intervenor lacks sufficient information to admit or deny the allegations in this paragraph.

181. Intervenor lacks sufficient information to admit or deny the allegations in this paragraph.

182. Intervenor lacks sufficient information to admit or deny the allegations in this paragraph.

183. Intervenor lacks sufficient information to admit or deny the allegations in this paragraph.

CLAIMS

COUNT ONE

184. Intervenor incorporates its prior responses.

185. The cited authority speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

186. The cited authority speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

187. The cited statute speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

188. Intervenor admits the allegations in the first sentence in this paragraph but denies the allegations made in the rest of this paragraph.

189. The cited authority speaks for itself. The remaining allegations in this paragraph are denied.

190. The allegations in the first sentence of this paragraph are legal conclusions to which no response is required. The allegations in the last two sentences of this paragraph are denied.

191. The allegations in this paragraph are legal conclusions to which no response is required.

192. Deny.

193. Deny.

COUNT TWO

194. Intervenor incorporates its prior responses.

195. The cited constitutional provision speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

196. The cited authorities speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

197. Deny.

198. Deny.

199. The allegations in this paragraph are legal conclusions to which no response is required.

200. Deny.

COUNT THREE

201. Intervenor incorporates its prior responses.

202. The cited constitutional provision speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

203. The allegations in this paragraph are legal conclusions to which no response is required.

204. Deny.

205. Deny.

206. Deny.

207. Deny.

COUNT FOUR

208. Intervenor incorporates its prior responses.

209. Intervenor admits the allegations in the first sentence of this paragraph but denies the allegations made in the rest of this paragraph.

210. The allegations in the first sentence of this paragraph are legal conclusions to which no response is required. The allegations in the second sentence of this paragraph are denied.

211. The allegations in this paragraph are legal conclusions to which no response is required.

212. Deny.

COUNT FIVE

213. Intervenor incorporates its prior responses.

214. The cited statute speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

215. The cited authority and statute speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

216. Deny.

217. Deny.

218. The allegations in this paragraph are legal conclusions to which no response is required.

219. The cited statute speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

220. The allegations in this paragraph are legal conclusions to which no response is required.

221. Deny.

COUNT SIX

222. Intervenor incorporates its prior responses.

223. The cited statute speaks for itself. Intervenor otherwise lacks sufficient information to admit or deny the allegations in this paragraph.

224. The allegations in this paragraph are legal conclusions to which no response is required.

225. The allegations in the first sentence of this paragraph are legal conclusions to which no response is required. Intervenor denies the allegations made in the rest of this paragraph.

226. Deny.

PRAYER FOR RELIEF

A. Intervenor denies that Plaintiffs are entitled to the requested relief.

B. Intervenor denies that Plaintiffs are entitled to the requested relief.

C. Intervenor denies that Plaintiffs are entitled to the requested relief.

D. Intervenor denies that Plaintiffs are entitled to the requested relief.

E. Intervenor denies that Plaintiffs are entitled to the requested relief.

AFFIRMATIVE DEFENSES

1. The complaint fails to state a claim upon which relief may be granted.
2. Plaintiffs' requested relief is foreclosed by the *Purcell* principle.

Respectfully submitted this 3rd day of June, 2025.

/s/ Thomas R. McCarthy

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