

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

LEAGUE OF WOMEN VOTERS EDUCATION
FUND, *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States, *et al.*,

Defendants.

Civil Action No. 25-0955 (CKK)

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

Thomas R. McCarthy (D.C. Bar 489651)
Gilbert C. Dickey (D.C. Bar 1645164)
Conor D. Woodfin (D.C. Bar 1780807)
William Bock IV* (Ohio Bar o105262)
CONSOVOY MCCARTHY PLLC
1600 Wilson Blvd., Ste. 700
Arlington, VA 22209
(703) 243-9423
tom@consovoymccarthy.com
gilbert@consovoymccarthy.com
conor@consovoymccarthy.com
wbock@consovoymccarthy.com

Lee E. Goodman (D.C. Bar 435493)
Michael Columbo (D.C. Bar 476738)
DHILLON LAW GROUP
lgoodman@dhillonlaw.com
mcolumbo@dhillonlaw.com
2121 Eisenhower Ave., Suite 608
Alexandria, VA 22314
(415) 433-1700

**pro hac vice forthcoming*

*Counsel for Applicant Intervenor-Defendant
The Republican National Committee*

Proposed Intervenor—the Republican National Committee—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. The allegations in this paragraph are legal conclusions to which no response is required.
3. The allegations in this paragraph are legal conclusions to which no response is required.
4. The Executive Order speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.
5. The Executive Order speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.
6. Intervenor admits that Plaintiffs are challenging the Executive Order’s documentary proof-of-citizenship requirement but denies the allegations in the rest of the paragraph.
7. Deny.
8. Deny.
9. Deny.
10. Intervenor denies that Plaintiffs are entitled to the requested relief.

PARTIES

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

23. Admit.

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

25. Admit.

26. Admit.

27. Admit.

28. Admit.

29. Admit.

JURISDICTION AND VENUE

30. 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.

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

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

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

FACTUAL ALLEGATIONS

34. Admit.

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

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

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

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

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

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

41. The cited statutes speak for themselves. Intervenor otherwise lacks sufficient information to admit or deny the allegations in this paragraph.

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

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

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

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

46. The cited statutes speak for themselves. Intervenor otherwise lacks sufficient information to admit or deny the allegations in this paragraph.

47. The cited statutes speak for themselves. Intervenor otherwise lacks sufficient information to admit or deny the allegations in this paragraph.

48. The cited authority speaks for itself. Intervenor otherwise denies the allegations in this paragraph.

49. The cited authority and portion of the Congressional Record speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

50. The cited statute and quotation from the Federal Register speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

51. The cited authority and agency decisions speak for themselves. Intervenor denies that the EAC has “correctly implemented the guidance of the NVRA” previously.

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

53. The cited Executive Order speaks for itself. Intervenor denies that the Executive Order “directly conflict[s] with the rules enacted by Congress.”

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

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

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

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

58. Deny.

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

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

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

62. Intervenor denies that the Executive Order burdens voters. Intervenor otherwise lacks sufficient information to admit or deny the allegations made in this paragraph.

63. The cited Executive Order speaks for itself.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

79. Deny.

80. Deny.

81. The allegations in the first sentence of this paragraph are denied. Intervenor otherwise lacks sufficient information to admit or deny the allegations made in the rest of this paragraph.

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

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

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

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

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

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

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

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

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

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

92. Deny.

93. Deny.

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

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

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

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

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

99. Intervenor denies the first sentence of the paragraph. Intervenor otherwise lacks sufficient information to admit or deny the allegations made in this paragraph.

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

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

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

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

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

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

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

CLAIMS FOR RELIEF

COUNT I

107. Intervenor incorporates its prior responses.

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

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

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

111. The allegations in the first two sentences of this paragraph are legal conclusions to which no response is required. Intervenor denies that the President has “no authority” to “regulate how the EAC maintains or makes determinations concerning the Federal Form.”

112. Deny.

113. Deny.

114. Deny.

115. Deny.

COUNT II

116. Intervenor incorporates its prior responses.

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

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

119. Deny.

120. Deny.

121. Deny.

122. Deny.

123. Deny.

PRAYER FOR RELIEF

1. Intervenor denies that Plaintiffs are entitled to the requested relief.
2. Intervenor denies that Plaintiffs are entitled to the requested relief.
3. Intervenor denies that Plaintiffs are entitled to the requested relief.
4. 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 lack statutory standing to sue.
3. Plaintiffs relief is foreclosed by the *Purcell* principle.

Respectfully submitted this 3rd day of June, 2025,

/s/ Thomas R. McCarthy

Lee E. Goodman (D.C. Bar 435493)
Michael Columbo (D.C. Bar 476738)
DHILLON LAW GROUP
2121 Eisenhower Ave., Ste. 608
Alexandria, VA 22314
(415) 433-1700
lgoodman@dhillonlaw.com
mcolumbo@dhillonlaw.com

Thomas R. McCarthy (D.C. Bar 489651)
Gilbert C. Dickey (D.C. Bar 1645164)
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William Bock IV* (Ohio Bar o105262)
CONSOVOY MCCARTHY PLLC
1600 Wilson Blvd., Ste. 700
Arlington, Virginia 22209
(703) 243-9423
tom@consovoymccarthy.com
gilbert@consovoymccarthy.com
conor@consovoymccarthy.com
wbock@consovoymccarthy.com

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*Counsel for Proposed Intervenor-Defendant
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