

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.

Case No. 1:25-cv-00955

**ANSWER TO PLAINTIFFS' COMPLAINT FOR DECLARATORY AND INJUNCTIVE
RELIEF**

Defendants President Donald J. Trump, the U.S. Election Assistance Commission, Commissioner Benjamin W. Hovland, Commissioner Donald L. Palmer, Commissioner Thomas Hicks, Commissioner Christy McCormick, and Executive Director Brianna Schletz, by and through their attorneys, answer Plaintiffs' Complaint For Declaratory and Injunctive Relief, ECF No. 1, as follows:

1. This paragraph consists of legal conclusions, which require no response. To the extent it requires a response, it is denied.
2. This paragraph contains legal conclusions, which require no response. To the extent it requires a response, it is denied.
3. This paragraph characterizes the Executive Order to which Defendants refer for its complete and accurate contents. It also contains legal conclusions, which require no response. To the extent it requires a response, it is denied.

4. All but the last sentence of this paragraph characterizes the Executive Order to which Defendants refer for its complete and accurate contents. It also contains legal conclusions, which require no response. To the extent it requires a response, it is denied. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegation in the final sentence.

5. This paragraph characterizes the Executive Order to which Defendants refer for its complete and accurate contents. It also contains legal conclusions, which require no response. To the extent it requires a response, it is denied.

6. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. The second sentence of this paragraph also consists of a characterization of the complaint and legal conclusions, which require no response. To the extent it requires a response, denied.

7. This paragraph characterizes the Constitution to which Defendants refer for its complete and accurate contents. This paragraph also consists of legal conclusions, which require no response. To the extent it requires a response, it is denied.

8. This paragraph characterizes the Executive Order to which Defendants refer for its complete and accurate contents. It also consists of legal conclusions, which require no response. To the extent a response is required, it is denied.

9. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in the last sentence of this paragraph. This paragraph otherwise consists of legal conclusions, which require no response.

10. Defendants deny that Plaintiffs are entitled to any of the relief they request or any relief whatsoever.

11. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

12. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

13. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

14. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

15. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

16. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

17. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

18. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

19. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

20. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

21. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

22. Defendants lack knowledge or information sufficient to form a belief about the truth

of the allegations in this paragraph.

23. Admitted.

24. This paragraph consists of citations to federal statutes to which Defendants refer for their complete and accurate contents. To the extent this paragraph inaccurately characterizes those authorities, denied.

25. Admitted.

26. Admitted.

27. Admitted.

28. Admitted.

29. Admitted.

30. This paragraph consists of a legal conclusion, to which no response is required. To the extent a response is deemed required, deny that this court has jurisdiction.

31. This paragraph consists of a legal conclusion, to which no response is required.

32. This paragraph consists of a legal conclusion, to which no response is required.

33. This paragraph consists of a legal conclusion, to which no response is required.

34. This paragraph consists of legal conclusions, which require no response. To the extent a response is deemed required, Defendants deny any characterization inconsistent with the legal authorities relied upon in this paragraph.

35. This paragraph consists of legal conclusions, which require no response, and cites the U.S. Constitution to which Defendants refer for its complete and accurate contents. To the extent a response is deemed required, Defendants deny any characterization inconsistent with the legal authorities relied upon in this paragraph.

36. This paragraph consists of legal conclusions, to which no response is required. To

the extent a response is deemed required, Defendants deny any characterization inconsistent with the legal authorities relied upon in this paragraph.

37. This paragraph cites federal statutes and legislative materials, to which Defendants refer for their complete and accurate contents. To the extent a response is deemed required, Defendants deny any characterization inconsistent with the legal authorities relied upon in this paragraph.

38. This paragraph cites federal statutes to which Defendants refer for their complete and accurate contents. To the extent a response is deemed required, Defendants deny any characterization inconsistent with the legal authorities relied upon in this paragraph.

39. This paragraph cites and characterizes federal statutes to which Defendants refer for their complete and accurate contents. It also contains legal conclusions, which require no response. To the extent a response is deemed required, Defendants deny any characterization inconsistent with the legal authorities relied upon in this paragraph.

40. This paragraph cites federal statutes to which Defendants refer for their complete and accurate contents. To the extent a response is deemed required, Defendants deny any characterization inconsistent with the legal authorities relied upon in this paragraph.

41. This paragraph cites legislative materials to which Defendants refer for their complete and accurate contents. To the extent a response is deemed required, Defendants deny any characterization inconsistent with the legal authorities relied upon in this paragraph.

42. This paragraph consists of citations to federal statutes to which Defendants refer for their complete and accurate contents. It also consists of legal conclusions, which require no response. To the extent a response is deemed required, Defendants deny any characterization inconsistent with the legal authorities relied upon in this paragraph.

43. This paragraph consists of citations to federal statutes and a judicial decision to which Defendants refer for their complete and accurate contents. To the extent a response is deemed required, Defendants deny any characterization inconsistent with the legal authorities relied upon in this paragraph.

44. This paragraph cites a federal statute to which Defendants refer for its complete and accurate contents and contains a legal conclusion, which require no response. To the extent a response is deemed required, Defendants deny any characterization inconsistent with the legal authorities relied upon in this paragraph.

45. This paragraph cites federal regulations to which Defendants refer for its complete and accurate contents. It also contains a legal conclusion, which requires no response. To the extent a response is deemed required, Defendants deny any characterization inconsistent with the legal authorities relied upon in this paragraph.

46. This paragraph cites federal statutes to which Defendants refer for their complete and accurate contents. It also contains legal conclusions, which require no response. To the extent a response is deemed required, Defendants deny any characterization inconsistent with the legal authorities relied upon in this paragraph. Defendants lack sufficient information or knowledge to form a belief about the truth of the allegations in the fifth sentence.

47. This paragraph cites and characterizes federal statutes to which Defendants refer for their complete and accurate contents. To the extent a response is deemed required, Defendants deny any characterization inconsistent with the legal authorities relied upon in this paragraph.

48. This paragraph cites a judicial decision to which Defendants refer for its complete and accurate contents. It also contains legal conclusions, which require no response. To the extent a response is deemed required, Defendants deny any characterization inconsistent with the legal

authorities relied upon in this paragraph. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in the final sentence.

49. This paragraph cites a judicial decisions and other legal authorities to which Defendants refer for its complete and accurate contents. To the extent a response is deemed required, Defendants deny any characterization inconsistent with the legal authorities relied upon in this paragraph.

50. This paragraph cites and characterizes a federal statute and federal regulations to which Defendants refer for their complete and accurate contents. To the extent a response is deemed required, Defendants deny any characterization inconsistent with the legal authorities relied upon in this paragraph.

51. This paragraph consists of legal conclusions, which require no response, and cites EAC Memoranda and a judicial decision to which Defendants refer for their complete and accurate contents. To the extent a response is deemed required, Defendants deny any characterization inconsistent with the legal authorities relied upon in this paragraph.

52. This paragraph consists of a legal conclusion, which requires no response. To the extent a response is deemed required, Defendants deny any characterization inconsistent with the legal authorities relied upon in this paragraph.

53. This paragraph cites and characterizes the Executive Order to which Defendants refer for its complete and accurate contents. It also consists of legal conclusions, which require no response. To the extent a response is deemed required, Defendants deny any characterization inconsistent with the legal authorities relied upon in this paragraph.

54. This paragraph cites the Executive Order to which Defendants refer for its complete and accurate contents. To the extent a response is deemed required, Defendants deny any

characterization inconsistent with the legal authorities relied upon in this paragraph.

55. This paragraph cites the Executive Order to which Defendants refer for its complete and accurate contents. To the extent a response is deemed required, Defendants deny any characterization inconsistent with the legal authorities relied upon in this paragraph.

56. This paragraph cites the Executive Order to which Defendants refer for its complete and accurate contents. To the extent a response is deemed required, Defendants deny any characterization inconsistent with the legal authorities relied upon in this paragraph.

57. This paragraph cites the Executive Order to which Defendants refer for its complete and accurate contents. To the extent a response is deemed required, Defendants deny any characterization inconsistent with the legal authorities relied upon in this paragraph.

58. This paragraph cites the Executive Order to which Defendants refer for its complete and accurate contents. It also consists of legal conclusions, which require no response.

59. This paragraph cites and characterizes the Executive Order to which Defendants refer for its complete and accurate contents. It also consists of legal conclusions, which require no response. To the extent a response is deemed required, Defendants deny any characterization inconsistent with the legal authorities relied upon in this paragraph.

60. This paragraph cites the Executive Order to which Defendants refer for its complete and accurate contents. It also consists of legal conclusions, which require no response. To the extent a response is deemed required, Defendants deny any characterization inconsistent with the legal authorities relied upon in this paragraph. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in sentences two and three of this paragraph.

61. This paragraph cites the Executive Order to which Defendants refer for its complete

and accurate contents. It also consists of legal conclusions, which require no response. To the extent a response is deemed required, Defendants deny any characterization inconsistent with the legal authorities relied upon in this paragraph.

62. Defendants lack information or knowledge sufficient to form a belief about the truth of the allegations in this paragraph.

63. This paragraph characterizes the Executive Order to which Defendants refer for its complete and accurate contents. To the extent a response is deemed required, Defendants deny any characterization inconsistent with the legal authorities relied upon in this paragraph.

64. The first sentence characterizes the Executive Order to which Defendants refer for its complete and accurate contents. Defendants lack sufficient information or knowledge to form a belief about the truth of the allegations in this paragraph.

65. The first sentence of this paragraph cites and characterizes the Executive Order and federal statutes to which Defendants refer for their complete and accurate contents. It also contains legal conclusions, which require no response. To the extent a response is deemed required, Defendants deny any characterization inconsistent with the legal authorities relied upon in this paragraph.

66. Defendants lack sufficient information or knowledge to form a belief about the truth of the allegations in this paragraph. It also consists of legal conclusions, which require no response. To the extent a response is deemed required, Defendants deny any characterization inconsistent with the legal authorities relied upon in this paragraph.

67. This paragraph cites and characterizes the Executive Order to which Defendants refer for its complete and accurate contents. To the extent a response is deemed required, Defendants deny any characterization inconsistent with the legal authorities relied upon in this

paragraph. Defendants admit that military identification cards do not always indicate citizenship.

68. This paragraph cites and characterizes the Executive Order to which Defendants refer for its complete and accurate contents. This paragraph also consist of legal conclusions, which require no response. To the extent a response is deemed required, Defendants deny any characterization inconsistent with the legal authorities relied upon in this paragraph.

69. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

70. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

71. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

72. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

73. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

74. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

75. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

76. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

77. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

78. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

79. This paragraph contains a legal conclusion, which requires no response.

80. This paragraph contains a legal conclusion, which requires no response. To the extent it requires a response, it is denied.

81. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

82. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. It also consists of legal conclusions, which require no response. To the extent a response is deemed required, denied.

83. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. It also consists of legal conclusions, which require no response. To the extent a response is deemed required, denied.

84. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

85. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

86. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

87. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

88. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

89. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

90. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

91. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

92. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. This paragraph also contains a legal conclusion, which requires no response. To the extent a response is deemed required, denied.

93. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. This paragraph also contains a legal conclusion, which requires no response. To the extent a response is deemed required, denied.

94. This paragraph cites a judicial decision and a state statute to which Defendants refer for their complete and accurate contents. To the extent a response is deemed required, Defendants deny any characterization inconsistent with the legal authorities relied upon in this paragraph.

95. This paragraph cites and characterizes a state statute and a judicial decision to which Defendants refer for their complete and accurate contents. To the extent a response is deemed required, Defendants deny any characterization inconsistent with the legal authorities relied upon in this paragraph.

96. This paragraph cites and characterizes a state statute and judicial decisions to which Defendants refer for their complete and accurate contents. To the extent a response is deemed required, Defendants deny any characterization inconsistent with the legal authorities relied upon in this paragraph. This paragraph also consists of legal conclusions, which require no response.

97. This paragraph cites and characterizes the Executive Order to which Defendants refer for its complete and accurate contents. Defendants lack knowledge or information sufficient to form a belief about the allegations in this paragraph.

98. This paragraph characterizes the Executive Order to which Defendants refer for its complete and accurate contents. To the extent it characterizes Arizona's requirements, that is a legal conclusion to which no response is required.

99. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. This paragraph also contains legal conclusions, which require no response.

100. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

101. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

102. This paragraph characterizes the Executive Order to which Defendants refer for its complete and accurate contents. It also contains a legal conclusion, which requires no response. Defendants lack knowledge and information sufficient to form a belief about the truth of the allegations in the first sentence.

103. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

104. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

105. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph.

106. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph. This paragraph also consists of legal conclusions, which require no response.

107. This paragraph consists of a characterization of Plaintiffs' complaint, which requires no response.

108. This paragraph consists of citations to a judicial decision to which Defendants refer to for its complete and accurate contents. To the extent a response is deemed required, Defendants deny any characterization inconsistent with the legal authority relied upon in this paragraph.

109. This paragraph consists of citations to and characterizations of judicial decisions to which Defendants refer to for their complete and accurate contents. To the extent a response is deemed required, Defendants deny any characterization inconsistent with the legal authorities relied upon in this paragraph.

110. This paragraph consists of citations to federal statutes and the U.S. Constitution, to which Defendants refer to for their complete and accurate contents, and legal conclusions, which require no response. To the extent a response is deemed required, Defendants deny any characterization inconsistent with the legal authorities relied upon in this paragraph.

111. This paragraph consists of legal conclusions, which require no response. To the extent a response is deemed required, Defendants deny any characterization inconsistent with the legal authorities relied upon in this paragraph.

112. This paragraph consists of legal conclusions, which require no response. It also cites and characterizes the Executive Order to which Defendants refer for its complete and accurate contents. To the extent a response is required, it is denied.

113. This paragraph consists of legal conclusions, which require no response. To the

extent a response is required, it is denied.

114. This paragraph consists of legal conclusions, which require no response, and characterizes the Executive Order to which Defendants refer for its complete and accurate contents. Defendants deny that Plaintiffs are entitled to any relief.

115. This paragraph consists of a legal conclusion, which requires no response. To the extent a response is required, it is denied.

116. This paragraph consists of a characterization of Plaintiffs' complaint, which requires no response.

117. This paragraph cites a judicial decision to which Defendants refer for its complete and accurate contents. To the extent a response is deemed required, Defendants deny any characterization inconsistent with the legal authority relied upon in this paragraph.

118. This paragraph cites federal statutes to which Defendants refer for their complete and accurate contents. To the extent a response is deemed required, Defendants deny any characterization inconsistent with the legal authorities relied upon in this paragraph.

119. This paragraph characterizes the Executive Order to which Defendants refer for its complete and accurate contents. It also consists of legal conclusions, which require no response.

120. This paragraph cites and characterizes the Executive Order and federal statutes to which Defendants refer for their complete and accurate contents. To the extent a response is deemed required, Defendants deny any characterization inconsistent with the legal authorities relied upon in this paragraph. It also consists of legal conclusions, which require no response.

121. This paragraph consists of a legal conclusion, which requires no response. To the extent a response is require, it is denied.

122. This paragraph consists of legal conclusions, which require no response, and

characterizes the Executive Order to which Defendants refer for its complete and accurate contents. Defendants deny that Plaintiffs are entitled to any relief.

123. This paragraph consists of legal conclusion, which require no response.

The remainder of the complaint contains Plaintiffs' prayer for relief, to which no response is required. To the extent a response is deemed necessary, Defendants deny that Plaintiffs are entitled to any of the relief they request or any relief whatsoever.

AFFIRMATIVE DEFENSES

First Defense

Plaintiffs' claims are not ripe or prudentially ripe.

Second Defense

Plaintiffs lack standing, including prudential standing, to bring their claims.

Having fully answered Plaintiffs' complaint, Defendants respectfully request that:

1. This Court enter judgment for Defendants and dismiss this action with prejudice;
2. Defendants be granted such further relief as the Court may deem just and proper.

Dated: June 7, 2025

Respectfully submitted,

YAAKOV M. ROTH
Acting Assistant Attorney General

ERIC J. HAMILTON
Deputy Assistant Attorney General
Civil Division, Federal Programs Branch

LESLEY FARBY
Deputy Director
Civil Division, Federal Programs Branch

/s/ Bridget K. O'Hickey
BRIDGET K. O'HICKEY
Counsel to the Assistant Attorney General
U.S. Department of Justice, Civil Division
950 Pennsylvania Avenue, NW Washington,
DC 20530
(202) 353-8679
Bridget.K.O'Hickey@usdoj.gov

Attorneys for Defendants

CERTIFICATE OF SERVICE

I, Bridget O'Hickey, hereby certify that I served a true copy of the above document upon all counsel of record via this court's electronic filing system and upon any non-registered participants via first class mail.

Dated: June 7, 2025

/s/ Bridget K. O'Hickey
BRIDGET K. O'HICKEY
Counsel to the Assistant Attorney General

