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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

RED WINE & BLUE, *et al*,

Plaintiffs,

v.

FRANK LAROSE, *et al.*,

Defendants.

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Civil Case No. 1:25-cv-01760

UNITED STATES' MEMORANDUM
IN SUPPORT OF ITS UNOPPOSED
MOTION FOR LEAVE TO FILE A
STATEMENT OF INTEREST

MEMORANDUM IN SUPPORT OF MOTION FOR LEAVE

Pursuant to L.R. 7.1(c), the United States includes this Memorandum in Support of its Motion for Leave.

The Attorney General of the United States is authorized under federal law “to attend to the interests of the United States in a suit pending in a court of the United States.” 28 U.S.C. § 517. This case presents important questions regarding the application of the Tenth Amendment, the proper interpretation of federal election statutes, and enforcement of the Fourteenth Amendments’ voting rights protections, in which the United States has a substantial interest. *See, e.g., Crawford v. Marion Cnty. Election Bd.*, 553 U.S. 181 (2008). The United States has “an interest in . . . honest and fair elections.” *United States v. Gradwell*, 243 U.S. 476, 480 (1917). “Confidence in the integrity of our electoral processes is essential to the functioning of our participatory democracy.” *Purcell v. Gonzalez*, 549 U.S. 1, 4 (2006).

The United States also satisfies the standard for filing an amicus brief. *Laufman v. Oakley Building & Loan Co.*, 404 F.Supp. 791, 791-92 (S.D. Ohio 1975) (accepting plaintiffs’ position that “no special showing is required of the United States in connection with an application by it to enter a case as an amicus curiae”). A party amicus should generally “aid the Court in resolving doubtful issues of law rather than present a partisan view of the facts.” *Bounty Minerals, LLC v. Chesapeake Exploration, LLC*, 2019 WL 7048981, *10 (N.D. Ohio 2019).

While there is “no established standard” for district courts to “evaluate motions for leave to file amicus curiae briefs,” they have broad discretion to allow such briefs “when they provide unique information or perspective that can help the court beyond the help that the lawyers for the parties are able to provide.” *League of Women Voters of Ohio v. LaRose*, 741 F.Supp.3d 694, 725 (N.D. Ohio 2024) quoting *Washington Alliance of Technology Workers v. United States*

Department of Homeland Security, 50 F.4th 164, 193 (D.D.C. 2022). The Court should grant leave to file an amicus where the proffered brief is useful and timely, where it would “address matters or advance arguments different from those raised by the parties,” and where the proposed amici have a cognizable interest in the outcome of the case. *League of Women Voters of Ohio*, 741 F.Supp.3d at 725. *See also Bounty Minerals*, 2019 WL 7048981, *10 (same).

As noted above, the United States’ interest is substantial. The United States’ Statement of Interest filing also would be timely. Plaintiffs filed this case on August 22, 2025, ECF No. 1, and their motion for a preliminary injunction on April 28, 2026. ECF No. 29. The Defendants filed their answer and motion to dismiss on September 18, 2025, ECF Nos. 14, 15, and opposition to the preliminary injunction on June 4, 2026. ECF No. 35. The case should be fully briefed on or about June 11, 2026, according to this Court’s briefing schedule, with the first hearing date scheduled for June 25, 2026. ECF No. 34. Accordingly, the Court should grant the United States motion for leave to file the attached Statement of Interest.

[Signatures next page]

Date: June 11, 2026

Respectfully submitted,

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