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WILLIAM S. ...

BY

*Attorneys for Defendant Secretary of State*

**IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA  
IN AND FOR CARSON CITY**

ZENAIDA DAGUSEN, an individual, *et al.*,

Plaintiffs,

vs.

FRANCISCO AGUILAR, in his official  
capacity as Nevada Secretary of State, *et al.*,

Defendants,

and

NATIONAL ASSOCIATION FOR THE  
ADVANCEMENT OF COLORED PEOPLE,

Intervenor-Defendant.

Case No.: 24 OC 00153 1B

Dept. No. I

**ERRATA TO SECRETARY OF STATE'S MOTION TO DISMISS**

Defendant Francisco Aguilar, in his official capacity as Nevada Secretary of State ("Secretary"), submits this Errata to his Motion to Dismiss. The Secretary has learned that the Motion to Dismiss misidentifies the number of votes cast in Nevada's 2024 general election. The Motion to Dismiss states that over two million votes were cast in that election, but instead, 1,487,887 votes were cast. See Silver State 2024 General Election Results, Voter Turnout, 2024 General Election Total, <https://silverstateelection.nv.gov/vote-turnout/>.

1           Consequently, the Secretary corrects lines 18–20 on page 9 of his Motion to Dismiss  
2 and lines 9–11 of the proposed order submitted with the Motion to Dismiss<sup>1</sup> as follows:

3           Plaintiffs allege a mere 3,731 “noncitizen” votes, Compl. ¶ 99, out of nearly 1.5  
4 million ~~over two million~~ votes cast in the 2024 general election, or (0.25% ~~0.18%~~ of the vote).

5           DATED this 14th day of March, 2025.

6                           AARON D. FORD  
7                           Attorney General

8                           By:   
9                           LAENA ST-JULES (Bar No. 15156)  
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10                           *Attorneys for Defendant Secretary of State*

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28                           <sup>1</sup> This error is already corrected in the proposed order submitted to the Court on  
March 14, 2025.

CERTIFICATE OF SERVICE

I certify that I am an employee of the State of Nevada, Office of the Attorney General, and that on this 14th day of March, 2025, I served a true and correct copy of the foregoing SECRETARY OF STATE'S SUPPLEMENTAL BRIEF ON UNAWARDABLE RELIEF by electronic mail addressed to:

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