

1 AARON D. FORD
2 Attorney General
LAENA ST-JULES (Bar No. 15156)
3 Senior Deputy Attorney General
Office of the Attorney General
100 North Carson Street
4 Carson City, NV 89701-4717
T: (775) 684-1265
5 F: (775) 684-1108
E: lstjules@ag.nv.gov

6 *Attorneys for Defendant Secretary of State*



ORIGINAL

REC'D & FILE'D

2025 MAR 14 PM 2:53

WILLIAM SCD, JR.

BY

W
DEPOT

9 **IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA**

10 **IN AND FOR CARSON CITY**

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

Case No.: 24 OC 00153 1B

12 Plaintiffs,

Dept. No. I

13 vs.

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

Defendants,

16 and

17 NATIONAL ASSOCIATION FOR THE
18 ADVANCEMENT OF COLORED PEOPLE,

19 Intervenor-Defendant.

20

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

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

Consequently, the Secretary corrects lines 18–20 on page 9 of his Motion to Dismiss and lines 9–11 of the proposed order submitted with the Motion to Dismiss¹ as follows:

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

DATED this 14th day of March, 2025.

AARON D. FORD
Attorney General

By: LAENA ST-JULES (Bar No. 15156)
Senior Deputy Attorney General

Attorneys for Defendant Secretary of State

¹ 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:

Brian R. Hardy
Harry L. Arnold
MARQUIS AURBACH
bhardy@maclaw.com
harnold@maclaw.com

Attorneys for Plaintiffs

Bradley S. Schrager
Daniel Bravo
BRAVO SCHRAGER LLP
bradley@bravoschrager.com
daniel@bravoschrager.com

David R. Fox
ELIAS LAW GROUP LLP
dfox@elias.law

*Attorneys for Defendants Democratic
National Committee
and Nevada State Democratic Party*

W. Chris Wicker
Jose A. Tafoya
WOODBURN AND WEDGE
wwicker@woodburnandwedge.com
itafoya@woodburnandwedge.com

Lee H. Rubin
Rachel J. Lamorte
Robert C. Double III
MAYER BROWN LLP
lrubin@mayerbrown.com
rlamorte@mayerbrown.com
rdouble@mayerbrown.com

Amira Mattar
John Bonifaz
Courtney Hostetler
FREE SPEECH FOR PEOPLE
amira@freespeechforpeople.org
bonifaz@freespeechforpeople.org
chostetler@freespeechforpeople.org

*Attorneys for Intervenor-Defendant
NAACP Tri-State Conference of
Idaho-Nevada-Utah*

Employee of the Office of the
Attorney General