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

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

ZENAIDA DAGUSEN, an individual;
REPUBLICAN NATIONAL
COMMITTEE; NEVADA REPUBLICAN
PARTY; DONALD J. TRUMP FOR
PRESIDENT 2024, INC.

Plaintiffs.

V.

FRANCISCO AGUILAR, in his official capacity as NEVADA SECRETARY OF STATE; DEMOCRATIC NATIONAL COMMITTEE, NEVADA STATE DEMOCRATIC PARTY.

Defendants

and

NAACP TRI-STATE CONFERENCE OF IDAHO-NEVADA-UTAH

Defendant-Intervenor

Case No.: 24 OC 00153 1B

Dept. No.: I

**DEFENDANTS DEMOCRATIC
NATIONAL COMMITTEE AND
NEVADA STATE DEMOCRATIC
PARTY ANSWER TO FIRST
AMENDED COMPLAINT**

Defendants Democratic National Committee and Nevada State Democratic Party (collectively, “Defendants”), by and through their attorneys of record, hereby answers the First Amended Complaint as follows:

INTRODUCTION

2 1. Paragraph 1 contains legal contentions, characterizations, conclusions,
3 and opinions to which no response is required. To the extent a response is required,
4 denied.

5 2. Paragraph 2 contains legal contentions, characterizations, conclusions,
6 and opinions to which no response is required. To the extent a response is required,
7 denied.

8 3. Paragraph 3 contains legal contentions, characterizations, conclusions,
9 and opinions to which no response is required. To the extent a response is required,
10 Defendants lack knowledge and information sufficient to form a belief as to the truth
11 of the allegations and therefore deny them.

12 4. Defendants lack knowledge and information sufficient to form a belief
13 as to the truth of the allegations in Paragraph 4 and therefore deny them.

14 5. Defendants lack knowledge and information sufficient to form a belief
15 as to the truth of the allegations in Paragraph 5 and therefore deny them.

16 6. Paragraph 6 contains legal contentions, characterizations, conclusions,
17 and opinions to which no response is required. To the extent a response is required,
18 Defendants lack knowledge and information sufficient to form a belief as to the truth
19 of the allegations and therefore deny them.

20 7. Paragraph 7 contains legal contentions, characterizations, conclusions,
21 and opinions to which no response is required. To the extent a response is required,
22 Defendants lack knowledge and information sufficient to form a belief as to the truth
23 of the allegations and therefore deny them.

24 8. Paragraph 8 contains legal contentions, characterizations, conclusions,
25 and opinions to which no response is required. To the extent a response is required,
26 Defendants lack knowledge and information sufficient to form a belief as to the truth
27 of the allegations and therefore deny them.

1 9. Paragraph 9 contains legal contentions, characterizations, conclusions,
2 and opinions to which no response is required. To the extent a response is required,
3 Defendants lack knowledge and information sufficient to form a belief as to the truth
4 of the allegations and therefore deny them.

5 10. Paragraph 10 contains legal contentions, characterizations, conclusions,
6 and opinions to which no response is required. To the extent a response is required,
7 Defendants lack knowledge and information sufficient to form a belief as to the truth
8 of the allegations and therefore deny them.

JURISDICTION AND VENUE

10 11. Paragraph 11 contains legal contentions, characterizations, conclusions,
11 and opinions to which no response is required. To the extent a response is required,
12 denied.

PARTIES

14 12. Defendants lack knowledge and information sufficient to form a belief
15 as to the truth of the allegations in Paragraph 12 and therefore deny them.

16 13. Admitted.

17 14. Defendants lack knowledge and information sufficient to form a belief
18 as to the truth of the allegations in Paragraph 14 and therefore deny them.

19 15. Defendants lack knowledge and information sufficient to form a belief
20 as to the truth of the allegations in Paragraph 15 and therefore deny them.

21 16. Admitted

22 17. Defendants lack knowledge and information sufficient to form a belief
23 as to the truth of the allegations in Paragraph 17 and therefore deny them.

24 18. Defendants admit that Plaintiff Nevada Republican Party is a political
25 party, and Defendants lack knowledge and information sufficient to form a belief as
26 to the truth of the remaining allegations in Paragraph 18 and therefore deny them.

27 19. Defendants lack knowledge and information sufficient to form a belief

1 as to the truth of the allegations in Paragraph 19 and therefore deny them.

2 20. Defendants lack knowledge and information sufficient to form a belief
3 as to the truth of the allegations in Paragraph 20 and therefore deny them.

4 21. Defendants lack knowledge and information sufficient to form a belief
5 as to the truth of the allegations in Paragraph 21 and therefore deny them.

6 | 22. Admitted.

7 23. Defendants admit that Defendants Democratic National Committee and
8 Nevada State Democratic Party are political parties representing and protecting the
9 interests of its members and in interests of Democrat candidates both nationally and
10 in Nevada. Paragraph 23 contains legal contentions, characterizations, conclusions,
11 and opinions to which no response is required. To the extent a response is required,
12 denied.

FACTUAL BACKGROUND

14 24. Paragraph 24 contains legal contentions, characterizations, conclusions,
15 and opinions to which no response is required. To the extent a response is required,
16 denied.

17 25. Paragraph 25 contains legal contentions, characterizations, conclusions,
18 and opinions to which no response is required. To the extent a response is required,
19 denied.

20 26. Paragraph 26 contains legal contentions, characterizations, conclusions,
21 and opinions to which no response is required. To the extent a response is required,
22 denied

23 27. Paragraph 27 contains legal contentions, characterizations, conclusions,
24 and opinions to which no response is required. To the extent a response is required,
25 denied.

26 28. Paragraph 28 contains legal contentions, characterizations, conclusions,
27 and opinions to which no response is required. To the extent a response is required

denied.

29. Paragraph 29 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, denied.

30. Paragraph 30 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, denied.

31. Paragraph 31 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, denied.

32. Paragraph 32 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, denied.

33. Paragraph 33 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, denied.

34. Paragraph 34 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, denied.

35. Defendants lack knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 35 and therefore deny them.

36. Paragraph 36 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, denied.

37. Paragraph 37 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, denied.

1 38. Paragraph 38 contains legal contentions, characterizations, conclusions,
2 and opinions to which no response is required. To the extent a response is required,
3 denied.

4 39. Paragraph 39 contains legal contentions, characterizations, conclusions,
5 and opinions to which no response is required. To the extent a response is required,
6 denied.

7 40. Paragraph 40 contains legal contentions, characterizations, conclusions,
8 and opinions to which no response is required. To the extent a response is required,
9 denied.

10 41. Paragraph 41 contains legal contentions, characterizations, conclusions,
11 and opinions to which no response is required. To the extent a response is required,
12 denied.

13 42. Paragraph 42 contains legal contentions, characterizations, conclusions,
14 and opinions to which no response is required. To the extent a response is required,
15 denied.

16 43. Paragraph 43 contains legal contentions, characterizations, conclusions,
17 and opinions to which no response is required. To the extent a response is required,
18 denied.

19 44. Paragraph 44 contains legal contentions, characterizations, conclusions,
20 and opinions to which no response is required. To the extent a response is required,
21 denied.

22 45. Paragraph 45 contains legal contentions, characterizations, conclusions,
23 and opinions to which no response is required. To the extent a response is required,
24 denied.

25 46. Paragraph 46 contains legal contentions, characterizations, conclusions,
26 and opinions to which no response is required. To the extent a response is required,
27 denied.

1 47. Paragraph 47 contains legal contentions, characterizations, conclusions,
2 and opinions to which no response is required. To the extent a response is required,
3 denied.

4 48. Paragraph 48 contains legal contentions, characterizations, conclusions,
5 and opinions to which no response is required. To the extent a response is required,
6 denied.

7 49. Paragraph 49 contains legal contentions, characterizations, conclusions,
8 and opinions to which no response is required. To the extent a response is required,
9 denied.

10 50. Paragraph 50 contains legal contentions, characterizations, conclusions,
11 and opinions to which no response is required. To the extent a response is required,
12 denied.

13 51. Paragraph 51 contains legal contentions, characterizations, conclusions,
14 and opinions to which no response is required. To the extent a response is required,
15 denied.

16 52. Defendants lack knowledge and information sufficient to form a belief
17 as to the truth of the allegations in Paragraph 52 and therefore deny them.

18 53. Paragraph 53 contains legal contentions, characterizations, conclusions,
19 and opinions to which no response is required. To the extent a response is required,
20 denied.

21 54. Paragraph 54 contains legal contentions, characterizations, conclusions,
22 and opinions to which no response is required. To the extent a response is required,
23 denied.

24 55. Paragraph 55 contains legal contentions, characterizations, conclusions,
25 and opinions to which no response is required. To the extent a response is required,
26 denied.

27 56. Defendants lack knowledge and information sufficient to form a belief

1 as to the truth of the allegations in Paragraph 56 and therefore deny them.

2 57. Defendants lack knowledge and information sufficient to form a belief
3 as to the truth of the allegations in Paragraph 57 and therefore deny them.

4 58. Defendants lack knowledge and information sufficient to form a belief
5 as to the truth of the allegations in Paragraph 58 and therefore deny them.

6 59. Defendants lack knowledge and information sufficient to form a belief
7 as to the truth of the allegations in Paragraph 59 and therefore deny them.

8 60. Defendants lack knowledge and information sufficient to form a belief
9 as to the truth of the allegations in Paragraph 60 and therefore deny them.

10 61. Defendants lack knowledge and information sufficient to form a belief
11 as to the truth of the allegations in Paragraph 61 and therefore deny them.

12 62. Defendants lack knowledge and information sufficient to form a belief
13 as to the truth of the allegations in Paragraph 62 and therefore deny them.

14 63. Defendants lack knowledge and information sufficient to form a belief
15 as to the truth of the allegations in Paragraph 63 and therefore deny them.

16 64. Defendants lack knowledge and information sufficient to form a belief
17 as to the truth of the allegations in Paragraph 64 and therefore deny them.

18 65. Defendants lack knowledge and information sufficient to form a belief
19 as to the truth of the allegations in Paragraph 65 and therefore deny them.

20 66. Defendants lack knowledge and information sufficient to form a belief
21 as to the truth of the allegations in Paragraph 66 and therefore deny them.

22 67. Defendants lack knowledge and information sufficient to form a belief
23 as to the truth of the allegations in Paragraph 67 and therefore deny them.

24 68. Defendants lack knowledge and information sufficient to form a belief
25 as to the truth of the allegations in Paragraph 68 and therefore deny them.

26 69. Defendants lack knowledge and information sufficient to form a belief
27 as to the truth of the allegations in Paragraph 69 and therefore deny them.

1 70. Defendants lack knowledge and information sufficient to form a belief
2 as to the truth of the allegations in Paragraph 70 and therefore deny them.

3 71. Defendants lack knowledge and information sufficient to form a belief
4 as to the truth of the allegations in Paragraph 71 and therefore deny them.

5 72. Defendants lack knowledge and information sufficient to form a belief
6 as to the truth of the allegations in Paragraph 72 and therefore deny them.

7 73. Defendants lack knowledge and information sufficient to form a belief
8 as to the truth of the allegations in Paragraph 73 and therefore deny them.

9 74. Defendants lack knowledge and information sufficient to form a belief
10 as to the truth of the allegations in Paragraph 74 and therefore deny them.

11 75. Defendants lack knowledge and information sufficient to form a belief
12 as to the truth of the allegations in Paragraph 75 and therefore deny them.

13 76. Defendants lack knowledge and information sufficient to form a belief
14 as to the truth of the allegations in Paragraph 76 and therefore deny them.

15 77. Defendants lack knowledge and information sufficient to form a belief
16 as to the truth of the allegations in Paragraph 77 and therefore deny them.

17 78. Paragraph 78 contains legal contentions, characterizations, conclusions,
18 and opinions to which no response is required. To the extent a response is required,
19 denied.

20 79. Defendants lack knowledge and information sufficient to form a belief
21 as to the truth of the allegations in Paragraph 79 and therefore deny them.

22 80. Defendants lack knowledge and information sufficient to form a belief
23 as to the truth of the allegations in Paragraph 80 and therefore deny them.

24 81. Defendants lack knowledge and information sufficient to form a belief
25 as to the truth of the allegations in Paragraph 81 and therefore deny them.

26 82. Defendants lack knowledge and information sufficient to form a belief
27 as to the truth of the allegations in Paragraph 82 and therefore deny them.

1 83. Defendants lack knowledge and information sufficient to form a belief
2 as to the truth of the allegations in Paragraph 83 and therefore deny them.

3 84. Defendants lack knowledge and information sufficient to form a belief
4 as to the truth of the allegations in Paragraph 84 and therefore deny them.

5 85. Defendants lack knowledge and information sufficient to form a belief
6 as to the truth of the allegations in Paragraph 85 and therefore deny them.

7 86. Defendants lack knowledge and information sufficient to form a belief
8 as to the truth of the allegations in Paragraph 86 and therefore deny them.

9 87. Defendants lack knowledge and information sufficient to form a belief
10 as to the truth of the allegations in Paragraph 87 and therefore deny them.

11 88. Defendants lack knowledge and information sufficient to form a belief
12 as to the truth of the allegations in Paragraph 88 and therefore deny them.

13 89. Defendants lack knowledge and information sufficient to form a belief
14 as to the truth of the allegations in Paragraph 89 and therefore deny them.

15 90. Defendants lack knowledge and information sufficient to form a belief
16 as to the truth of the allegations in Paragraph 90 and therefore deny them.

17 91. Paragraph 91 contains legal contentions, characterizations, conclusions,
18 and opinions to which no response is required. To the extent a response is required,
19 denied.

20 92. Defendants lack knowledge and information sufficient to form a belief
21 as to the truth of the allegations in Paragraph 92 and therefore deny them.

22 93. Defendants lack knowledge and information sufficient to form a belief
23 as to the truth of the allegations in Paragraph 93 and therefore deny them.

24 94. Defendants lack knowledge and information sufficient to form a belief
25 as to the truth of the allegations in Paragraph 94 and therefore deny them.

26 95. Defendants lack knowledge and information sufficient to form a belief
27 as to the truth of the allegations in Paragraph 95 and therefore deny them.

1 96. Defendants lack knowledge and information sufficient to form a belief
2 as to the truth of the allegations in Paragraph 96 and therefore deny them.

3 97. Defendants lack knowledge and information sufficient to form a belief
4 as to the truth of the allegations in Paragraph 97 and therefore deny them.

5 98. Defendants lack knowledge and information sufficient to form a belief
6 as to the truth of the allegations in Paragraph 98 and therefore deny them.

7 99. Defendants lack knowledge and information sufficient to form a belief
8 as to the truth of the allegations in Paragraph 99 and therefore deny them.

9 100. Defendants lack knowledge and information sufficient to form a belief
10 as to the truth of the allegations in Paragraph 100 and therefore deny them.

11 101. Paragraph 101 contains legal contentions, characterizations,
12 conclusions, and opinions to which no response is required. To the extent a response
13 is required, denied.

14 102. Defendants lack knowledge and information sufficient to form a belief
15 as to the truth of the allegations in Paragraph 102 and therefore deny them.

COUNT I

Equal Protection Under the Nevada Constitution (Nev. Const. art. IV, §21)

20 103. Defendants incorporate their responses to Paragraphs 1 through 102 as
21 if set forth fully herein.

22 104. Paragraph 104 contains legal contentions, characterizations,
23 conclusions, and opinions to which no response is required. To the extent a response
24 is required, denied.

25 105. Paragraph 105 contains legal contentions, characterizations,
26 conclusions, and opinions to which no response is required. To the extent a response

1 is required, denied.

2 106. Paragraph 106 contains legal contentions, characterizations,
3 conclusions, and opinions to which no response is required. To the extent a response
4 is required, denied.

107. Paragraph 107 contains legal contentions, characterizations, conclusions, and opinions to which no response is required. To the extent a response is required, denied.

8 108. Paragraph 108 contains legal contentions, characterizations,
9 conclusions, and opinions to which no response is required. To the extent a response
10 is required, denied.

11 109. Paragraph 109 contains legal contentions, characterizations,
12 conclusions, and opinions to which no response is required. To the extent a response
13 is required Defendants lack knowledge and information sufficient to form a belief as
14 to the truth of the allegations and therefore deny them.

15 110. Defendants lack knowledge and information sufficient to form a belief
16 as to the truth of the allegations in Paragraph 110 and therefore deny them.

17 111. Paragraph 111 contains legal contentions, characterizations,
18 conclusions, and opinions to which no response is required. To the extent a response
19 is required, denied.

COUNT II

Right to Due Process Under the Nevada Constitution (Nev. Const. art. I, §8)

24 112. Defendants incorporate their responses to Paragraphs 1 through 111 as
25 if set forth fully herein.

113. Paragraph 113 contains legal contentions, characterizations,

1 conclusions, and opinions to which no response is required. To the extent a response
2 is required, denied.

3 114. Paragraph 114 contains legal contentions, characterizations,
4 conclusions, and opinions to which no response is required. To the extent a response
5 is required, denied.

6 115. Paragraph 115 contains legal contentions, characterizations,
7 conclusions, and opinions to which no response is required. To the extent a response
8 is required, Defendants lack knowledge and information sufficient to form a belief as
9 to the truth of the allegations and therefore deny them.

10 116. Paragraph 116 contains legal contentions, characterizations,
11 conclusions, and opinions to which no response is required. To the extent a response
12 is required, Defendants lack knowledge and information sufficient to form a belief as
13 to the truth of the allegations and therefore deny them.

14 117. Paragraph 117 contains legal contentions, characterizations,
15 conclusions, and opinions to which no response is required. To the extent a response
16 is required, denied.

17 **GENERAL DENIAL**

18 Defendants deny every allegation in the First Amended Complaint that is not
19 expressly admitted herein.

20 **AFFIRMATIVE DEFENSES**

21 Defendants set forth their affirmative defenses without assuming the burden
22 of proving any fact, issue, or element of a cause of action where such burden properly
23 belongs to Plaintiffs. Moreover, nothing stated here is intended or shall be construed
24 as an admission that any particular issue or subject matter is relevant to the
25 allegations in the First Amended Complaint. Defendants reserve the right to amend
26 or supplement their affirmative defenses as additional facts concerning defenses
27 become known.

1 Defendants assert the following affirmative defenses:

2 Plaintiffs' claims are barred by the doctrine of laches.

3 Plaintiffs' claims are barred due to failure to exhaust administrative remedies.

4 Plaintiffs' claims are barred because Defendant Francisco Aguilar, in his official
5 capacity as Nevada Secretary of State acted in good faith and in accordance with
6 all applicable laws and regulations.

7 Plaintiffs fail to state a claim on which relief can be granted.

8 Plaintiffs lack standing to pursue their claims.

9 **PRAYER FOR RELIEF**

10 WHEREFORE, Defendants respectfully request that this Court:

11 A. Deny that Plaintiffs are entitled to any relief;

12 B. Dismiss the First Amended Complaint in its entirety, with prejudice;

13 and

14 C. Grant such other and further relief as the Court may deem just and
15 proper.

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AFFIRMATION

2 The undersigned hereby affirm that the foregoing document does not contain
3 the social security number of any person.

4 Dated this 26th day of September, 2025.

BRAVO SCHRAGER LLP

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Democratic Party*

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of September, 2025, a true and correct copy of the foregoing **DEFENDANTS DEMOCRATIC NATIONAL COMMITTEE AND NEVADA STATE DEMOCRATIC PARTY ANSWER TO FIRST AMENDED COMPLAINT** was served via electronic mail per agreement as follows:

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