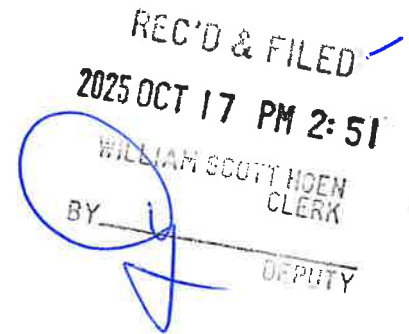


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*Attorneys for Intervenor-Defendants NAACP  
Tri-State Conference of Idaho-Nevada-Utah*



**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; and  
DONALD J. TRUMP FOR PRESIDENT  
2024, INC.

Plaintiffs,

vs.

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

Complaint filed: September 11, 2024  
FAC filed: September 11, 2025  
Trial Date: None Set

**ANSWER TO FIRST AMENDED COMPLAINT BY INTERVENOR-DEFENDANT  
NAACP TRI-STATE CONFERENCE OF IDAHO-NEVADA-UTAH**

Intervenor-Defendant NAACP Tri-State Conference of Idaho-Nevada-Utah ("Tri-State NAACP"), by and through their attorneys, submit the following Answer to Plaintiffs' First Amended Complaint for Declaratory and Injunctive Relief ("FAC"). Tri-State NAACP responds to the allegations in the FAC as follows:

## INTRODUCTION

1  
2           1.       The allegations in Paragraph 1 state legal conclusions to which no response is  
3 required. To the extent any response is required, Tri-State NAACP admits that United States  
4 citizenship is a requirement to vote in federal, state, and local elections in Nevada. Tri-State  
5 NAACP lacks knowledge or information sufficient to form a belief as to the truth of the remaining  
6 allegations in Paragraph 1 and therefore denies them.

7           2.       The allegations in Paragraph 2 state legal conclusions to which no response is  
8 required. To the extent any response is required, Tri-State NAACP admits that United States  
9 citizenship is a requirement to vote in federal, state, and local elections in Nevada. Tri-State  
10 NAACP lacks knowledge or information sufficient to form a belief as to the truth of the remaining  
11 allegations in Paragraph 2 and therefore denies them.

12           3.       The allegations in Paragraph 3 state legal conclusions to which no response is  
13 required. To the extent any response is required, Tri-State NAACP admits that United States  
14 citizenship is a requirement to vote in federal, state, and local elections in Nevada. Upon  
15 information and belief, Tri-State NAACP denies that noncitizens are “registered and voting in  
16 Nevada elections.” Tri-State NAACP lacks knowledge or information sufficient to form a belief as  
17 to the truth of the remaining allegations in Paragraph 3 and therefore denies them.

18           4.       The allegations in Paragraph 4 state legal conclusions to which no response is  
19 required. To the extent any response is required, upon information and belief, Tri-State NAACP  
20 denies that “[p]ast and recent evidence shows that noncitizen registration is worsening.” Tri-State  
21 NAACP lacks knowledge or information sufficient to form a belief as to the truth of the remaining  
22 allegations in Paragraph 4 and therefore denies them.

23           5.       The allegations in Paragraph 5 state legal conclusions to which no response is  
24 required. Tri-State NAACP lacks knowledge or information sufficient to form a belief as to the  
25 truth of the remaining allegations in Paragraph 5 and therefore denies them.

26           6.       The allegations in Paragraph 6 state legal conclusions to which no response is  
27 required. To the extent any response is required, Tri-State NAACP admits that “legally present,”  
28

1 noncitizen “immigrants . . . cannot legally vote in Nevada elections.” Tri-State NAACP also admits  
2 that Section 1 of Article 2 of the Constitution of the State of Nevada exists and that the FAC  
3 purports to characterize such source. Tri-State NAACP lacks knowledge or information sufficient  
4 to form a belief as to the truth of the remaining allegations in Paragraph 6 and therefore denies  
5 them.

6 7. Tri-State NAACP lacks knowledge or information sufficient to form a belief as to  
7 the truth of the allegations in Paragraph 7 regarding Individual Plaintiff’s residency and voter  
8 registration status, and therefore denies them. The remaining allegations in Paragraph 7 state legal  
9 conclusions to which no response is required.

10 8. Tri-State NAACP lacks knowledge or information sufficient to form a belief as to  
11 the truth of the allegations in Paragraph 8 regarding the composition of the Republican Party  
12 Plaintiffs’ membership and therefore denies them. The remaining allegations in Paragraph 8 state  
13 legal conclusions to which no response is required.

14 9. Tri-State NAACP lacks knowledge or information sufficient to form a belief as to  
15 the truth of the allegations in Paragraph 9 and therefore denies them.

16 10. The allegations in Paragraph 10 state legal conclusions to which no response is  
17 required. To the extent any response is required, Tri-State NAACP lacks knowledge or information  
18 sufficient to form a belief as to the truth of the remaining allegations in Paragraph 10 and therefore  
19 denies them.

## 20 **JURISDICTION AND VENUE**

21 11. The allegations in Paragraph 11 state legal conclusions to which no response is  
22 required. To the extent any response is required, Tri-State NAACP admits that this action is  
23 “against a public officer” and denies the remaining allegations in Paragraph 11.

## 24 **PARTIES**

25 12. Tri-State NAACP lacks knowledge and information sufficient to form a belief as to  
26 the truth of the allegations in Paragraph 12 and therefore denies them.

1           13.     Tri-State NAACP lacks knowledge or information sufficient to form a belief as to  
2 the truth of the allegations in Paragraph 13 and therefore denies them.

3           14.     Tri-State NAACP lacks knowledge or information sufficient to form a belief as to  
4 the truth of the allegations in Paragraph 14 and therefore denies them.

5           15.     Tri-State NAACP lacks knowledge and information sufficient to form a belief as to  
6 the truth of the allegations in Paragraph 15 and therefore denies them.

7           16.     Tri-State NAACP admits that “[i]n November 2024,” Republican “candidates  
8 appeared on the ballot in Nevada for election to the Presidency, U.S. Senate, and U.S. House of  
9 Representatives.” Tri-State NAACP lacks knowledge or information sufficient to form a belief as  
10 to the truth of the remaining allegations in Paragraph 16 and therefore denies them.

11          17.     The allegations in Paragraph 17 state legal conclusions to which no response is  
12 required. To the extent any response is required, Tri-State NAACP lacks knowledge or information  
13 sufficient to form a belief as to the truth of the allegations in Paragraph 17 and therefore denies  
14 them.

15          18.     Tri-State NAACP lacks knowledge and information sufficient to form a belief as to  
16 the truth of the allegations in Paragraph 18 and therefore denies them.

17          19.     Tri-State NAACP lacks knowledge and information sufficient to form a belief as to  
18 the truth of the allegations in Paragraph 19 and therefore denies them.

19          20.     The allegations in Paragraph 20 state legal conclusions to which no response is  
20 required. To the extent any response is required, Tri-State NAACP lacks knowledge or information  
21 sufficient to form a belief as to the truth of the allegations in Paragraph 20 and therefore denies  
22 them.

23          21.     The allegations in Paragraph 21 states a legal conclusion to which no response is  
24 required. To the extent any response is required, Tri-State NAACP admits that “Donald J. Trump  
25 was a candidate for President on the ballot for the 2024 Nevada general election.” Tri-State NAACP  
26 lacks knowledge or information sufficient to form a belief as to the truth of the remaining  
27 allegations in Paragraph 21 and therefore denies them.

1           22.     The allegations in Paragraph 22 state legal conclusions to which no response is  
2 required. To the extent any response is required, Tri-State NAACP admits Francisco Aguilar is the  
3 Secretary of State of Nevada and is being sued in his official capacity. Tri-State NAACP also admits  
4 that the NRS 293.124 exists and that the FAC purports to characterize such source. Tri-State  
5 NAACP lacks knowledge or information sufficient to form a belief as to the truth of the remaining  
6 allegations in Paragraph 22 and therefore denies them.

7           23.     The allegations in Paragraph 23 state legal conclusions to which no response is  
8 required. To the extent any response is required, Tri-State NAACP admits that the “Democratic  
9 National Committee and Nevada State Democratic Party are political parties.” Tri-State NAACP  
10 also admits that the cases cited in Paragraph 23 exist and that the FAC purports to characterize such  
11 sources. Tri-State NAACP lacks knowledge or information sufficient to form a belief as to the truth  
12 of the remaining allegations in Paragraph 23 and therefore denies them.

### **FACTUAL BACKGROUND**

#### **I.     Voter registration in Nevada**

15           24.     The allegations in Paragraph 24 state legal conclusions to which no response is  
16 required. To the extent any response is required, Tri-State NAACP admits the allegations in  
17 Paragraph 24.

18           25.     The allegations in Paragraph 25 state legal conclusions to which no response is  
19 required. To the extent any response is required, Tri-State NAACP admits the allegations in  
20 Paragraph 25.

21           26.     The allegations in Paragraph 26 state legal conclusions to which no response is  
22 required. To the extent any response is required, Tri-State NAACP admits the allegations in  
23 Paragraph 26.

24           27.     The allegations in Paragraph 27 state legal conclusions to which no response is  
25 required. To the extent any response is required, Tri-State NAACP denies the allegations in  
26 Paragraph 27 because the quoted text is a selective, inaccurate, and incomplete recitation of NRS  
27 293.485(1).

1           28.     The allegations in Paragraph 28 state legal conclusions to which no response is  
2 required. To the extent any response is required, Tri-State NAACP denies the allegations in  
3 Paragraph 28 because the quoted text is a selective, inaccurate, and incomplete recitation of NRS  
4 293.675(1) and §293.675(3)(d).

5           29.     The allegations in Paragraph 29 state legal conclusions to which no response is  
6 required. To the extent any response is required, Tri-State NAACP denies the allegations in  
7 Paragraph 29 because the quoted text is a selective, inaccurate, and incomplete recitation of NAC  
8 293.472.

9           30.     The allegations in Paragraph 30 state legal conclusions to which no response is  
10 required. To the extent any response is required, Tri-State NAACP admits that NRS 293.675(3)(c)  
11 and NAC 293.472 exist and that the FAC purports to characterize such source.

12           31.     The allegations in Paragraph 31 state legal conclusions to which no response is  
13 required. To the extent any response is required, Tri-State NAACP admits that Paragraph 31  
14 accurately quotes the excerpted portion of NRS 293.055.

15           32.     The allegations in Paragraph 32 state legal conclusions to which no response is  
16 required. To the extent any response is required, Tri-State NAACP lacks knowledge or information  
17 sufficient to form a belief as to the truth of the allegations in Paragraph 32 and therefore denies  
18 them.

19           33.     The allegations in Paragraph 33 state legal conclusions to which no response is  
20 required. To the extent any response is required, Tri-State NAACP denies the allegations in  
21 Paragraph 33 because the quoted text is a selective, inaccurate, and incomplete recitation of NRS  
22 293.675(3)(i).

23           34.     The allegations in Paragraph 34 state legal conclusions to which no response is  
24 required. To the extent any response is required, Tri-State NAACP admits that Paragraph 34  
25 accurately quotes the excerpted portion of NRS 293.124(1).

1           35.     Tri-State NAACP admits that the quoted website exists and that the FAC purports  
2 to characterize such source. Tri-State NAACP lacks knowledge or information sufficient to form  
3 a belief as to the truth of the remaining allegations in Paragraph 35 and therefore denies them.

4           36.     The allegations in Paragraph 36 state legal conclusions to which no response is  
5 required. To the extent any response is required, Tri-State NAACP lacks knowledge or information  
6 sufficient to form a belief as to the truth of the allegations in Paragraph 36 and therefore denies  
7 them.

8           37.     The allegations in Paragraph 37 state legal conclusions to which no response is  
9 required. To the extent any response is required, Tri-State NAACP denies the allegations in  
10 Paragraph 37 because the quoted text is a selective, inaccurate, and incomplete recitation of NRS  
11 293.485(1).

12          38.     The allegations in Paragraph 38 state legal conclusions to which no response is  
13 required. To the extent any response is required, Tri-State NAACP denies the allegations in  
14 Paragraph 38 because the quoted text is a selective, inaccurate, and incomplete recitation of NAC  
15 293.464.

16          39.     The allegations in Paragraph 39 state legal conclusions to which no response is  
17 required. To the extent any response is required, Tri-State NAACP denies the allegations in the  
18 first sentence of Paragraph 39 because the quoted text is a selective, inaccurate, and incomplete  
19 recitation of NRS 293.124(2). Tri-State NAACP lacks knowledge or information sufficient to form  
20 a belief as to the truth of the remaining allegations in the second sentence of Paragraph 39 and  
21 therefore denies them.

## 22     **II.     Nevada's Voter Registration Process**

23          40.     Tri-State NAACP admits the allegations in Paragraph 40.

24          41.     The allegations in Paragraph 41 state legal conclusions to which no response is  
25 required. To the extent any response is required, Tri-State NAACP admits that NRS 293.517(1)(a)  
26 and NRS 293.517(1) exist and that the FAC purports to characterize such sources.

42. The allegations in Paragraph 42 state legal conclusions to which no response is required. To the extent any response is required, Tri-State NAACP admits that NRS 293.5742(1) exists and that the FAC purports to characterize such source.

43. The allegations in Paragraph 43 state legal conclusions to which no response is required. To the extent any response is required, Tri-State NAACP admits that NRS 93.5742(1) exists and that the FAC purports to characterize such source.

44. The allegations in Paragraph 44 state legal conclusions to which no response is required. To the extent any response is required, Tri-State NAACP admits that NRS 293.5742(2) exists and that the FAC purports to characterize such source.

45. The allegations in Paragraph 45 state legal conclusions to which no response is required. To the extent any response is required, Tri-State NAACP admits that Paragraph 45 accurately quotes the excerpted portion of NRS 293.5752(2).

46. The allegations in Paragraph 46 state legal conclusions to which no response is required. To the extent any response is required, Tri-State NAACP admits that NRS 293.5752(1)(c) exists and that the FAC purports to characterize such source.

47. The allegations in Paragraph 47 state legal conclusions to which no response is required. To the extent any response is required, Tri-State NAACP admits that NRS 483.290 exists and that the FAC purports to characterize such source.

48. The allegations in Paragraph 48 state legal conclusions to which no response is required. To the extent any response is required, Tri-State NAACP admits NRS 483.290(7)(b) exists and that the FAC purports to characterize such source.

49. Tri-State NAACP lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 49 and therefore denies them.

50. Tri-State NAACP lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 50 and therefore denies them.

51. Tri-State NAACP lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 51 and therefore denies them.



1           52.     Tri-State NAACP lacks knowledge or information sufficient to form a belief as to  
2 the truth of the allegations in Paragraph 52 and therefore denies them.

3           53.     The allegations in Paragraph 53 state legal conclusions to which no response is  
4 required. To the extent any response is required, Tri-State NAACP admits NAC 293.408 exists and  
5 that the FAC purports to characterize such source.

6           54.     The allegations in Paragraph 54 state legal conclusions to which no response is  
7 required. To the extent any response is required, Tri-State NAACP admits NAC §§ 293.409(I)(b)  
8 and 293.408 exist and that the FAC purports to characterize such sources.

9           55.     The allegations in Paragraph 55 state legal conclusions to which no response is  
10 required. To the extent any response is required, Tri-State NAACP admits NAC § 293.409(3) exists  
11 and that the FAC purports to characterize such source.

12     **III.     The Secretary is failing to ensure that noncitizens are not registered to vote.**

13           56.     Tri-State NAACP admits that the press release cited in Paragraph 56 exists and that  
14 the FAC purports to characterize such source. Tri-State NAACP lacks knowledge or information  
15 sufficient to form a belief as to the truth of the remaining allegations in Paragraph 56 and therefore  
16 denies them.

17           57.     Tri-State NAACP admits that the press release quoted in Paragraph 57 exists and  
18 that the FAC purports to characterize such source. Tri-State NAACP lacks knowledge or  
19 information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 57  
20 and therefore denies them.

21           58.     Tri-State NAACP lacks knowledge or information sufficient to form a belief as to  
22 the truth of the allegations in Paragraph 58 and therefore denies them.

23           59.     Tri-State NAACP lacks knowledge or information sufficient to form a belief as to  
24 the truth of the allegations in Paragraph 59 and therefore denies them.

25           60.     Tri-State NAACP lacks knowledge or information sufficient to form a belief as to  
26 the truth of the allegations in Paragraph 60 and therefore denies them.

61. Tri-State NAACP lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 61 and therefore denies them.

62. Tri-State NAACP lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 62 and therefore denies them.

63. Tri-State NAACP lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 63 and therefore denies them.

64. Tri-State NAACP lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 64 and therefore denies them.

65. The allegations in Paragraph 65 state legal conclusions to which no response is required. To the extent any response is required, Tri-State NAACP admits that the case cited in Paragraph 65 exists and that the FAC purports to characterize such source. Tri-State NAACP lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 65 and therefore denies them.

66. Tri-State NAACP lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 66 and therefore denies them.

67. Tri-State NAACP lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 67 and therefore denies them.

68. Tri-State NAACP lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 68 and therefore denies them.

69. Tri-State NAACP lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 69 and therefore denies them.

70. Tri-State NAACP lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 70 and therefore denies them.

71. In Tri-State NAACP lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 71 and therefore denies them.

72. Tri-State NAACP lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 72 and therefore denies them.

1           73.     Tri-State NAACP lacks knowledge or information sufficient to form a belief as to  
2 the truth of the allegations in Paragraph 73 and therefore denies them.

3           74.     Tri-State NAACP lacks knowledge or information sufficient to form a belief as to  
4 the truth of the allegations in Paragraph 74 and therefore denies them.

5           75.     Tri-State NAACP lacks knowledge or information sufficient to form a belief as to  
6 the truth of the allegations in Paragraph 75 and therefore denies them.

7           76.     Tri-State NAACP lacks knowledge or information sufficient to form a belief as to  
8 the truth of the allegations in Paragraph 76 and therefore denies them.

9           77.     Tri-State NAACP lacks knowledge or information sufficient to form a belief as to  
10 the truth of the allegations in Paragraph 77 and therefore denies them.

11          78.     The allegations in Paragraph 78 state legal conclusions to which no response is  
12 required. To the extent any response is required, Tri-State NAACP admits that Paragraph 78  
13 accurately quotes the excerpted portion of NRS 6.045(3)(a).

14          79.     Tri-State NAACP lacks knowledge or information sufficient to form a belief as to  
15 the truth of the allegations in Paragraph 79 and therefore denies them.

16          80.     Tri-State NAACP lacks knowledge or information sufficient to form a belief as to  
17 the truth of the allegations in Paragraph 80 and therefore denies them.

18          81.     The allegations in Paragraph 81 state legal conclusions to which no response is  
19 required. To the extent a response is required, Tri-State NAACP lacks knowledge or information  
20 sufficient to form a belief as to the truth of the allegations in Paragraph 81 and therefore denies  
21 them.

22          82.     The allegations in Paragraph 82 state legal conclusions to which no response is  
23 required. To the extent a response is required, Tri-State NAACP lacks knowledge or information  
24 sufficient to form a belief as to the truth of the allegations in Paragraph 82 and therefore denies  
25 them.

26          83.     The allegations in Paragraph 83 state legal conclusions to which no response is  
27 required. To the extent a response is required, Tri-State NAACP lacks knowledge or information  
28

1 sufficient to form a belief as to the truth of the allegations in Paragraph 83 and therefore denies  
2 them.

3 84. The allegations in Paragraph 84 state legal conclusions to which no response is  
4 required. To the extent a response is required, Tri-State NAACP lacks knowledge or information  
5 sufficient to form a belief as to the truth of the allegations in Paragraph 84 and therefore denies  
6 them.

7 85. The allegations in Paragraph 85 state legal conclusions to which no response is  
8 required. To the extent a response is required, Tri-State NAACP lacks knowledge or information  
9 sufficient to form a belief as to the truth of the allegations in Paragraph 85 and therefore denies  
10 them.

11 86. The allegations in Paragraph 86 state legal conclusions to which no response is  
12 required. To the extent a response is required, Tri-State NAACP lacks knowledge or information  
13 sufficient to form a belief as to the truth of the allegations in Paragraph 86 and therefore denies  
14 them.

15 87. The allegations in Paragraph 87 state legal conclusions to which no response is  
16 required. To the extent a response is required, Tri-State NAACP lacks knowledge or information  
17 sufficient to form a belief as to the truth of the allegations in Paragraph 87 and therefore denies  
18 them.

19 88. Tri-State NAACP lacks knowledge or information sufficient to form a belief as to  
20 the truth of the allegations in Paragraph 88 and therefore denies them.

21 89. Tri-State NAACP lacks knowledge or information sufficient to form a belief as to  
22 the truth of the remaining allegations in Paragraph 89 and therefore denies them.

23 90. Tri-State NAACP denies the allegations in Paragraph 90.  
24  
25  
26  
27  
28

1 **IV. The Secretary's violations disproportionately dilute the Individual Plaintiffs vote as a**  
2 **Republican voter as well as those of all eligible Nevada Republican voters.**

3 91. The allegations in Paragraph 91 state legal conclusions to which no response is  
4 required. To the extent any response is required, Tri-State NAACP denies the allegations in  
5 Paragraph 91.

6 92. The allegations in Paragraph 92 state legal conclusions to which no response is  
7 required. To the extent any response is required, Tri-State NAACP denies the allegations in  
8 Paragraph 92.

9 93. Tri-State NAACP lacks knowledge or information sufficient to form a belief as to  
10 the truth of the allegations in Paragraph 93 and therefore denies them.

11 94. Tri-State NAACP lacks knowledge or information sufficient to form a belief as to  
12 the truth of the allegations in Paragraph 94 and therefore denies them.

13 95. Tri-State NAACP lacks knowledge or information sufficient to form a belief as to  
14 the truth of the allegations in Paragraph 95 and therefore denies them.

15 96. Tri-State NAACP lacks knowledge or information sufficient to form a belief as to  
16 the truth of the allegations in Paragraph 96 and therefore denies them.

17 97. The allegations in Paragraph 97 state legal conclusions to which no response is  
18 required. To the extent any response is required, Tri-State NAACP denies the allegations in  
19 Paragraph 97.

20 98. Tri-State NAACP lacks knowledge or information sufficient to form a belief as to  
21 the truth of the allegations in Paragraph 98 and therefore denies them.

22 99. Tri-State NAACP lacks knowledge or information sufficient to form a belief as to  
23 the truth of the allegations in Paragraph 99 and therefore denies them.

24 100. The allegations in Paragraph 100 state legal conclusions to which no response is  
25 required. To the extent any response is required, Tri-State NAACP denies the allegations in  
26 Paragraph 100.

101. The allegations in Paragraph 101 state legal conclusions to which no response is required. To the extent any response is required, upon information and belief, Tri-State NAACP denies that the Secretary has failed “to ensure that only U.S citizens are on the voter registration lists.” Tri-State NAACP lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 101 and therefore denies them.

102. Tri-State NAACP denies the allegations in Paragraph 102.

**COUNT I**

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

103. In response to Paragraph 103, Tri-State NAACP repeats, realleges, and incorporates its responses to each and every paragraph above.

104. The allegations in Paragraph 104 state legal conclusions to which no response is required. To the extent any response is required, Tri-State NAACP admits that Article IV, Section 21 of the Nevada Constitution exists and that the FAC purports to characterize such source.

105. The allegations in Paragraph 105 state legal conclusions to which no response is required. To the extent any response is required, Tri-State NAACP admits that Article IV, Section 21 of the Nevada Constitution and the case cited in Paragraph 105 exist and that the FAC purports to characterize such sources.

106. The allegations in Paragraph 106 state legal conclusions to which no response is required. To the extent any response is required, Tri-State NAACP admits that the cases cited in Paragraph 106 exist and that the FAC purports to characterize such sources.

107. The allegations in Paragraph 107 states legal conclusions to which no response is required. To the extent any response is required, Tri-State NAACP admits that the cases cited in Paragraph 107 exist and that the FAC purports to characterize such source.

108. The allegations in Paragraph 108 state legal conclusions to which no response is required. To the extent any response is required, Tri-State NAACP admits that the case cited in Paragraph 108 exists and that the FAC purports to characterize such source.

109. The allegations in Paragraph 109 state legal conclusions to which no response is

1 required. To the extent any response is required, Tri-State NAACP denies the allegations in  
2 Paragraph 109.

3 110. The allegations in Paragraph 110 state legal conclusions to which no response is  
4 required. To the extent any response is required, Tri-State NAACP denies the allegations in  
5 Paragraph 110.

6 111. The allegations in Paragraph 110 state legal conclusions to which no response is  
7 required. To the extent any response is required, Tri-State NAACP denies the allegations in  
8 Paragraph 111.

## 9 **COUNT II**

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

11 112. In response to Paragraph 112, Tri-State NAACP repeats, realleges, and incorporates  
12 its responses to each and every paragraph above.

13 113. The allegations in Paragraph 113 state legal conclusions to which no response is  
14 required. To the extent any response is required, Tri-State NAACP admits that Article I, Section 8  
15 of the Nevada Constitution and the cases cited in Paragraph 113 exist and that the FAC purports to  
16 characterize such sources.

17 114. The allegations in paragraph 114 state legal conclusions to which no response is  
18 required. To the extent any response is required, Tri-State NAACP admits that the case cited in  
19 Paragraph 114 exists and that the FAC purports to characterize such source.

20 115. The allegations in Paragraph 115 state legal conclusions to which no response is  
21 required. To the extent any response is required, Tri-State NAACP denies the allegations in  
22 Paragraph 115.

23 116. The allegations in Paragraph 116 state legal conclusions to which no response is  
24 required. To the extent any response is required, Tri-State NAACP denies the allegations in  
25 Paragraph 116.

1           117. The allegations in Paragraph 117 state legal conclusions to which no response is  
2 required. To the extent any response is required, Tri-State NAACP denies the allegations in  
3 Paragraph 117.

4                                   **GENERAL DENIAL**

5           Tri-State NAACP denies every allegation in the FAC that is not expressly admitted herein.

6                                   **AFFIRMATIVE DEFENSES**

7           Tri-State NAACP sets forth affirmative defenses without assuming the burden of proving  
8 any fact, issue, or element of a cause of action where such burden properly belongs to Plaintiffs.  
9 Moreover, nothing stated here is intended or shall be construed as an admission that any particular  
10 issue or subject matter is relevant to the allegations in the FAC. Tri-State NAACP reserves the right  
11 to amend or supplement its affirmative defenses as additional facts concerning defenses become  
12 known.

13           Tri-State NAACP asserts the following affirmative defenses:

- 14           1. Plaintiffs fail to state a claim upon which relief can be granted.
- 15           2. Plaintiffs lack standing to pursue their claims.
- 16           3. There is no ripe controversy between the parties.
- 17           4. Plaintiffs' claims are barred because the relief sought violates the National Voter  
18 Registration Act.
- 19           5. Plaintiffs' claims are barred by the doctrine of laches.
- 20           6. Plaintiffs' requested relief will result in unconstitutionally depriving U.S. citizens  
21 who are eligible voters of their right to vote.
- 22           7. Plaintiffs' claims are barred due to their failure to exhaust administrative remedies.

23                                   **PRAYER FOR RELIEF**

24           **WHEREFORE**, Tri-State NAACP respectfully prays that the Court grant and award Tri-  
25 State NAACP the following relief against Plaintiffs:

- 26           A. Deny that Plaintiffs are entitled to any relief;
- 27           B. Dismiss the FAC in its entirety, with prejudice; and



1 C. Grant such other relief as the Court deems just and proper.

2 **AFFIRMATION**

3 Pursuant to NRS 239B.030 and 603A.040, the undersigned does hereby affirm that this  
4 document does not contain the personal information of any person.

5 DATED this 17<sup>th</sup> day of October, 2025

6 WOODBURN AND WEDGE

7  
8 By:



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**CERTIFICATE OF SERVICE**

Pursuant to NRCP 5(b), I certify under penalty of perjury that I am an employee of the Law Office of Woodburn and Wedge, 6100 Neil Road, Suite 500, Reno, Nevada 89511, and that on this date I served the: **ANSWER TO FIRST AMENDED COMPLAINT BY INTERVENOR-DEFENDANT NAACP TRI-STATE CONFERENCE OF IDAHO-NEVADA-UTAH** upon the parties set forth below by:

☐ I hereby certify that on this date, I electronically filed the foregoing with the Clerk of the Court by using the Court's electronic filing system, which will send a notice of electronic filing to the following:

☐ Placing an original or true copy thereof in a sealed envelope placed for collection and mailing in the United States Mail, at Reno, Nevada, postage paid and affixed thereto, following ordinary business practices by regular mail, addressed to:

☒ By electronic mail (e-mail) to the following e-mail address(es):

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☐ Federal Express or other overnight delivery

DATED this 17<sup>th</sup> day of October, 2025.

  
\_\_\_\_\_  
Mele D. Puletau  
An employee of Woodburn and Wedge