

1 **KRISTIN K. MAYES**  
2 **ATTORNEY GENERAL**  
3 Office of the Arizona Attorney General  
4 2005 North Central Avenue  
5 Phoenix, AZ 85004-1592  
6 (602) 542-3333

7 Hayleigh S. Crawford (No. 032326)  
8 Syreeta A. Tyrell (No.034273)  
9 Alexa G. Salas (No. 039722)  
10 [Hayleigh.Crawford@azag.gov](mailto:Hayleigh.Crawford@azag.gov)  
11 [Syreeta.Tyrell@azag.gov](mailto:Syreeta.Tyrell@azag.gov)  
12 [Alexa.Salas@azag.gov](mailto:Alexa.Salas@azag.gov)  
13 *Attorneys for Defendants the State of Arizona*

14 Karen J. Hartman-Tellez (No. 021121)  
15 Kara Karlson (No. 029407)  
16 Kyle Cummings (No. 032228)  
17 [Karen.Hartman@azag.gov](mailto:Karen.Hartman@azag.gov)  
18 [Kara.Karlson@azag.gov](mailto:Kara.Karlson@azag.gov)  
19 [Kyle.Cummings@azag.gov](mailto:Kyle.Cummings@azag.gov)  
20 *Attorneys for Defendant Adrian Fontes*

21 **SUPERIOR COURT OF ARIZONA**

22 **MARICOPA COUNTY**

23 REPUBLICAN PARTY OF ARIZONA  
24 LLC, an Arizona limited liability  
25 company and political party committee;  
26 REPUBLICAN NATIONAL  
27 COMMITTEE, a national political party  
28 committee; and GINA SWOBODA, and  
individual,

Plaintiffs,

v.

STATE OF ARIZONA, a body politic;  
and ADRIAN FONTES, in his official  
capacity as the Secretary of State of  
Arizona,

Defendants.

No. CV2025-022859

**REPLY IN SUPPORT OF  
MOTION TO DISMISS**

(Assigned to the Hon. Michael Herrod)

1 In 2005, the state extended the ability to register to vote for federal candidates to  
2 a small group of United States citizens who meet all the constitutional and statutory  
3 qualifications to register to vote. Twenty years later, Plaintiffs, whose party members  
4 sponsored and supported the bill, seek to challenge that law as a violation of a  
5 constitutional residency requirement that does not exist. As explained in the Defendants’  
6 Motion to Dismiss, Plaintiffs’ case fails as a matter of law because they lack standing and  
7 A.R.S. § 16-103(E) does not violate the Arizona Constitution.

8 In their Response to the Motion, Plaintiffs attempt to sidestep standing  
9 requirements by relying on inapposite case law and theories of standing that do not hold  
10 up to scrutiny. In particular, they attempt to demonstrate that they have standing to seek  
11 a declaratory judgment based on a recent case, *RNC v. Fontes*, 566 P.3d 984 (Ariz. App.  
12 2025), that was decided under the Arizona Administrative Procedure Act (“APA”), not  
13 the Declaratory Judgment Act (“DJA”) that they invoked in the Complaint. Because this  
14 case involves a constitutional challenge to a statute, the APA does not apply and *RNC*  
15 cannot rescue their claim. Nor can Plaintiffs show that A.R.S. § 16-103(E) results in  
16 unequal weighing of Plaintiff Swoboda’s vote to support a valid vote dilution claim. And,  
17 case law does not support a cognizable claim of competitive injury in this case. Plaintiffs’  
18 claim is equally unpersuasive on the merits. The Arizona Constitution gives the  
19 Legislature the authority to set the requirements for voter residency as it did by enacting  
20 A.R.S. § 16-103(E). This Court should dismiss Plaintiffs’ Complaint.

## 21 ARGUMENT

### 22 **I. Caselaw confirms that Plaintiffs lack standing under the DJA.**

#### 23 **A. *RNC v. Fontes* is inapplicable to Plaintiffs’ standing arguments.**

24 Plaintiffs assert that *RNC v. Fontes* controls here.<sup>1</sup> (Resp. at 2-3.) But that case is  
25 legally and factually inapposite. First, *RNC*’s APA standing analysis in an action  
26 concerning the validity of the Elections Procedures Manual (EPM) has no bearing on the  
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28 \_\_\_\_\_  
<sup>1</sup> On August 19, 2025, the Arizona Supreme Court granted review of *RNC*.

1 declaratory relief that Plaintiffs seek here. The APA entitles anyone “who is or may be  
2 affected by a rule,” to seek a declaratory judgment regarding the validity of the rule,  
3 A.R.S. § 41-1034(A), whereas only those whose “rights, status or other legal relations *are*  
4 affected by a statute” may obtain relief under A.R.S. § 12-1832. 566 P.3d at 989, ¶¶ 12-  
5 13. Contrary to Plaintiffs’ assertion (Resp. at 3 n.1), the court did not “independently  
6 f[ind] standing under the DJA.” *See RNC*, 566 P.3d at 990, ¶ 14 (“We therefore conclude  
7 the RNC has standing to seek declaratory relief *under the APA* to challenge the validity  
8 of the 2023 EPM.”) (emphasis added). This case thus does not bind nor aid the Court.

9         Second, *RNC* is factually distinguishable from Plaintiffs’ allegations. There, the  
10 court found that the RNC had a cognizable interest in the EPM’s validity because its  
11 “members, candidates, and volunteers” were “necessarily affected” by the EPM, because  
12 it “govern[s] every stage of the electoral process” and “failure to follow [it] is a crime.”  
13 *Id.* at ¶¶ 14-15. By contrast, Plaintiffs offer no facts demonstrating that their ability to  
14 “sponsor and conduct voter registration drives” or to “expend . . . resources supporting  
15 Republican candidates in Arizona,” (Resp. at 3 (citing Compl. ¶¶ 8-9)), is “necessarily  
16 affected” by a law setting registration requirements for a narrow and discrete group of  
17 voters. *RNC*, 566 P.3d at 990, ¶ 14. The same is true for Plaintiffs’ ability to “frame []  
18 issues,” and engage with electoral “regulatory structures,” all of which they assert, for the  
19 first time, in their response. (Resp. at 3.)

20         Finally, *RNC* does not endorse Plaintiffs’ assertion that a “*singular* interest in the  
21 lawful administration of elections” provides them with standing to sue over *any* election-  
22 related matter under the DJA. (Resp. at 2 (emphasis added).) The court’s standing  
23 analysis turned, not on the RNC’s mere interests in the “administration,” “procedural  
24 integrity,” and “competitive environment” of Arizona elections, but on how RNC-  
25 affiliated individuals’ rights to engage in the electoral process were “necessarily affected”  
26 by the EPM. *RNC*, 566 P.3d at 990, ¶ 14. Plaintiffs’ distorted reading of *RNC* underscores  
27 that they remain without a cognizable interest affected by A.R.S. § 16-103(E). Notably,  
28 in *Arizona Free Enterprise Club v. Fontes*, a recent memorandum decision affirming

1 summary judgment for the Secretary against another EPM challenge that the Republican  
2 Party of Arizona filed, the court stressed that Plaintiff’s interest in the “enforcement of  
3 [a] statutory scheme,” absent an “impair[ment]” to that interest, is too generalized to  
4 confer standing under the DJA. 2 CA-CV 24-0221, 2025 WL 2462952 at \*10-\*11, ¶ 32  
5 (Ariz. App. Aug. 27, 2025) (mem. decision).<sup>2</sup>

6 Accordingly, Plaintiffs’ challenge to the facial constitutionality of a statute enacted  
7 twenty years ago must be based on more than a mere allegation that the statute is  
8 unconstitutional. But Plaintiffs have not alleged any changed circumstances since the  
9 Legislature enacted the statute in 2005 that now creates a “real and present need to know”  
10 whether A.R.S. § 16-103(E) is constitutional. Nor have they alleged that the statute on  
11 its face creates inherent inequality or structures the competitive environment to their  
12 detriment. Plaintiffs therefore have not established a “present existing controversy” to  
13 permit this Court to adjudicate their claim. *Mills v. Bd. of Tech. Registration*, 253 Ariz.  
14 415, 424-25, ¶¶ 25, 30 (2022).

15 **B. Plaintiffs’ other cases do not support them.**

16 Plaintiffs’ superficial attempts to analogize their interest in the constitutionality of  
17 A.R.S. § 16-103(E) to Arizona Supreme Court precedent also fail. In *Arizona School*  
18 *Boards Association v. State*, the court concluded that plaintiffs, including a school board  
19 association, had standing to challenge a bill impeding their county’s ability to regulate to  
20 prevent the spread of Covid-19 where plaintiffs lived and worked. 252 Ariz. 219, 225,  
21 ¶ 20 (2022). Similarly, in *Pena v. Fullinwider*, the court held that plaintiffs had standing  
22 to challenge the repeal of a law requiring cost-per-unit information because their rights  
23 as consumers were “‘affected’ by” the loss of such information. 124 Ariz. 42, 44 (1979).

24 Plaintiffs argue that they have “at least an equally palpable stake” as the plaintiffs  
25 in *Arizona School Boards* and *Pena* “in the constitutionality of a statute that directly  
26 governs the qualification of the voters who will elect or defeat . . . [their] candidates.”  
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28 <sup>2</sup> Although this memorandum decision, attached as Exhibit A, is not binding on the Court, Defendants cite it for its persuasive value. See Ariz. R. Sup. Ct. 111(c)(1)(C).

1 (Resp. at 5.) But, their analogy belies the fact that plaintiffs in *Arizona School Boards*  
2 and *Pena* established a clear nexus between their “rights”—to infectious disease  
3 mitigation in their community and workplace, and to consumer pricing information,  
4 respectively—and the challenged laws. Plaintiffs, however, adduce no such facts. For  
5 example, they do not demonstrate, as in *Arizona School Boards*, that A.R.S. § 16-103(E)  
6 impedes their ability to engage in voter registration efforts or spend resources to support  
7 Republican candidates in Arizona. They also do not establish, as in *Pena*, that the law  
8 has revoked any resources to conduct those activities. Thus, those analogies fall flat.

9 Citing no authority, Plaintiffs also declare that “[a] stake sufficient to qualify as a  
10 ‘beneficial interest’” for mandamus relief “definitionally constitutes a ‘real interest’ under  
11 the DJA.” (Resp. at 5). But no Arizona Court has so held, and Plaintiffs cannot mix-and-  
12 match legal standards to reach their desired result. *Compare* A.R.S. § 12-2021 (“A writ  
13 of mandamus may be issued . . . to any person . . . beneficially interested”) and *Ariz. Pub.*  
14 *Integrity All. v. Fontes* (“AZPIA”), 250 Ariz. 58, 62, ¶¶ 11-12 (2020) (requiring a  
15 beneficial interest to establish standing for mandamus relief) *with Ariz. Sch. Bds. Ass’n*,  
16 252 Ariz. at 224, ¶ 16 (requiring an “actual or real interest in the matter for determination”  
17 to establish standing for declaratory relief) (citation omitted). Thus, no matter its  
18 reasoning, *AZPIA*’s holding regarding standing to seek mandamus relief is irrelevant here.

19 **II. Plaintiffs’ vote dilution theory is inconsistent with pertinent Supreme Court**  
20 **precedent and their claim of competitive injury fails to pass muster.**

21 **A. Plaintiffs’ vote dilution theory is unsound.**

22 At the foundation of Supreme Court vote dilution precedent is the principle that  
23 “all qualified voters have the right to vote and to have their vote counted equally with  
24 other individual qualified voters *in the same electoral unit.*” *Election Integrity Project*  
25 *Cal., Inc. v. Weber*, 113 F.4th 1072, 1087 (9th Cir. 2024) (emphasis added). “The crux  
26 of a vote dilution claim is *inequality* of voting power—not diminishment of voting  
27 power *per se.*” *Id.* If the latter controlled, any voter would have standing to allege that  
28 any state law adding more voters into the electorate is unlawful because it diminishes

1 their voting power. But, a claim of vote dilution in the legal sense requires more.  
2 Plaintiffs must assert that “disproportionate weight is given to some votes over others  
3 within the same electoral unit.” *Id.*

4 Supreme Court precedent makes clear that a legally permissible vote dilution claim  
5 rests on inequality of the weight given to votes within the same electoral unit. *See Gill v.*  
6 *Whitford*, 585 U.S. 48 (2018); *Reynolds v. Sims*, 377 U.S. 533 (1964); *Baker v. Carr*, 369  
7 U.S. 186 (1962). In *Gill*, the Supreme Court held that vote dilution is a “district specific,”  
8 not a statewide injury, because “an individual voter . . . is placed in a single district [and]  
9 votes for a single representative.” 585 U.S. at 66. Therefore, “[t]he boundaries of the  
10 district, and the composition of its voters, determine whether and to what extent a  
11 particular voter [suffers diminishment of her voting power].” *Id.* In *Reynolds*, the Court  
12 found a county-level injury where a plan to apportion seats in the Alabama State  
13 Legislature effectively weighed votes from rural counties more heavily than votes from  
14 urban counties by carving the state into legislative districts that covered significantly  
15 different numbers of constituents. 377 U.S. at 563-67. And, in *Baker* the Court also  
16 found a county-level injury where a classification disfavored “the voters in the counties  
17 in which they reside, placing them in a position of constitutionally unjustifiable inequality  
18 vis-à-vis voters in irrationally favored counties.” 369 U.S. at 207–08.

19 Considering this precedent, Plaintiffs’ Complaint lacks the requisite legal  
20 foundation to support standing under a vote dilution theory. Plaintiffs make no allegation  
21 of district-level harm or harm within any distinct electoral unit wherein Plaintiff Swoboda  
22 votes and whereby her vote is weighed unequally to other voters. Even drawing all  
23 reasonable inferences in Plaintiffs’ favor, at best they could plausibly allege that a few  
24 more people might register to vote in Plaintiff Swoboda’s district.<sup>3</sup> Therefore, Supreme  
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26 <sup>3</sup> For example, only three of Pima County’s approximately 670,000 voters are A.R.S.  
27 § 16-103(E) voters. *See* Fifield, Jen, “Republicans target voting rights of U.S. citizens  
28 who have never lived in the country,” *Votebeat* (July 16, 2025) (available at:  
<https://www.votebeat.org/arizona/2025/07/16/republican-lawsuit-challenges-uocava-voting-rights/>) (last visited Sept. 3, 2025).

1 Court precedent forecloses Plaintiffs’ vote dilution claim.

2 Unable to allege any harm based on the weighing of votes at the district-level (or  
3 another electoral unit-specific level), Plaintiffs rely on *Hall v. District of Columbia Board*  
4 *of Elections*, 141 F. 4th 200 (D.C. Cir. 2025) to argue that Plaintiff Swoboda has standing  
5 under a vote dilution theory merely based on the existence and addition of purportedly  
6 ineligible voters to the Arizona electorate. (Resp. at 6-10.) But *Hall* is inconsistent with  
7 the Supreme Court vote dilution precedent discussed above, which assesses how votes  
8 are weighed relative to others within the same electoral unit. (*See also* Mot. at 9-10.)

9 *Hall* is also inconsistent with key standing principles requiring that an injury be  
10 concrete and particularized. (*See id.* at 10.) To support standing on a vote dilution theory,  
11 Plaintiffs must state a degree of concreteness and particularity that is more precise than  
12 the statewide electorate as a whole—i.e., a specific standard of reference. *Cf. Baker*, 369  
13 U.S. at 300 (Frankfurter, J., dissenting) (“Talk of ‘debasement’ or ‘dilution’ is circular  
14 talk. One cannot speak of ‘debasement’ or ‘dilution’ of the value of a vote until there is  
15 first defined a standard of reference as to what a vote should be worth.”). Under Supreme  
16 Court precedent, the standard of reference for a vote dilution claim is a specific electoral  
17 unit. In the absence of that, Plaintiffs ask the Court to accept a vote dilution theory that  
18 is essentially limitless. *See, e.g., Election Integrity Project*, 113 F.4th at 1087 n.10  
19 (rejecting a similar vote dilution claim because it “would appear to be limitless” and  
20 “would transform every violation of state election law . . . into a potential federal equal-  
21 protection claim . . .”). The Court should reject Plaintiffs’ theory.

22 Perhaps recognizing the absence of any electoral unit standard of reference in the  
23 Complaint, Plaintiffs claim in their response that they allege that “A.R.S. § 16-103(E)’s  
24 inclusion of ineligible individuals in the universe of registered voters dilutes [Plaintiff  
25 Swoboda’s] vote *relative to an alternative electorate comprised only of constitutionally*  
26 *qualified voters.*” (Resp. at 8 (citing Compl. ¶¶ 10, 36) (emphasis added).) But Plaintiffs  
27 made no such allegation in the Complaint. And, even if they did, this “alternative  
28 electorate” would not be a proper standard of reference because it does not denote any

1 particular electoral unit. Plaintiffs attempt to recast *Gill* in their favor (Resp. at 8) in  
2 propounding this “alternative electorate.” However, in referencing a “hypothetical,”  
3 *Gill*’s analysis, unlike Plaintiffs’ theory of vote dilution, is grounded on weighing a  
4 voter’s vote based on a specific electoral unit—a district. *See Gill*, 585 U.S. at 67 (holding  
5 that the harm of vote dilution “arises from the particular composition of the voter’s own  
6 district, which causes his vote—having been packed or cracked—to carry less weight than  
7 it would carry in another, hypothetical district”). *Gill* is thus fundamentally inapposite to  
8 Plaintiffs’ framing of vote dilution.<sup>4</sup>

9 **B. Plaintiffs’ allegations cannot support a claim of competitive injury.**

10 Plaintiffs have not, and cannot, make the requisite showing to establish standing  
11 for a competitive injury. (*See Mot.* at 5-8.) To avoid duplicative briefing, Defendants  
12 will not restate all of the arguments in their Motion here and specifically address only  
13 Plaintiffs’ contentions with regard to *Shays v. Election Comm’n*, 414 F.3d 76 (D.C. Cir.  
14 2005), before briefly turning to the issue of causation.

15 Plaintiffs claim that *Shays* illustrates that “capacity to induce competitive harm” is  
16 determinative of finding a competitive injury. (Resp. at 11.) However, as noted in the  
17 Motion, in *Shays*, the D.C. Circuit found a competitive injury where the court concluded  
18 that the challenged FEC campaign finance rules “illegally structure[d] a competitive  
19 environment,” 414 F.3d at 87, in the way it regulated “candidates’ . . . opportunities to  
20 persuade the electorate.” *Id.* at 85. But A.R.S. § 16-103(E) does not “structure” a  
21 competitive environment at all because it is not a regulation that creates or alters any  
22 options to be exploited by any political party such as to structure (or restructure) the  
23 competitive relationship between them. It therefore does not constitute a state-imposed  
24 competitive injury under *Shays*. Indeed, *Shays* rests on the recognition that “regulated  
25 litigants suffer legal injury when agencies set the rules of the game in violation of  
26 statutory directives.” *League of United Latin Am. Citizens v. Exec. Off. of the President*,

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28 <sup>4</sup> As to causation on this issue, Defendants maintain their position that Plaintiffs’  
allegation of vote dilution is too attenuated to confer standing. (*See Mot.* at 10-11.)

1 780 F. Supp. 3d 135, 181 (D.D.C. 2025) (quoting *Shays*, 414 F.3d at 85). Unlike the  
2 FEC campaign finance rules in *Shays*, which directly regulated the parties at issue there,  
3 A.R.S. § 16-103(E) does not regulate political parties. It merely enables individuals—  
4 certain overseas U.S. citizens—to register to vote in Arizona elections, and choose any  
5 (or no) political party they wish.

6 As to causation, Plaintiffs entirely miss the mark. (*See Resp.* at 11-12.)  
7 Defendants do not contend that Plaintiffs need to “show differentials in vote counts or  
8 election results attributable to A.R.S. § 16-103(E)” to establish causation. (*Id.* at 12.) But  
9 as in *Mecinas v. Hobbs*, Plaintiffs must still show an adequate causal nexus for the alleged  
10 state-imposed injury. *See* 30 F.4th 890, 899–900 (9th Cir. 2022) (stating the “actual  
11 outcome” point that Plaintiffs note in the context of analyzing “injury in fact” but then  
12 also separately addressing whether the plaintiffs had met “the two [other] elements of  
13 standing . . . traceability and redressability”). Although Defendants explained the  
14 required causal showing in the Motion (at 7-8), Plaintiffs have not even attempted to argue  
15 that such a nexus exists. The Court should rule in Defendants’ favor on the issue.

16 **III. The Arizona Constitution authorized the Legislature to enact A.R.S. § 16-**  
17 **103(E).**

18 **A. Plaintiffs’ distinction between durational residence requirements and**  
19 **“bona fide” residence requirements does not control this case.**

20 Even if Plaintiffs could get past the standing hurdle (they cannot), their claim that  
21 A.R.S. § 16-103(E) violates the Arizona Constitution fails as a matter of law. Relying  
22 heavily on dicta in a United States Supreme Court case that determined that Tennessee’s  
23 one-year durational residence requirement violated voters’ 14th Amendment right to  
24 equal protection, Plaintiffs seek to import a “bona fide residence” requirement into the  
25 Arizona Constitution that simply is not there. (*See Resp.* at 12 (quoting *Dunn v.*  
26 *Blumstein*, 405 U.S. 330, 343 (1972))). Plaintiffs then try to use that non-existent  
27 constitutional bona fide residence requirement to restrict the Arizona Legislature’s ability  
28 to define who may register to vote for federal offices. But the Arizona Constitution gives  
the Legislature wide latitude to define voter qualifications, including residence, and set

1 durational residence requirements for voter registration.<sup>5</sup> The Legislature exercised that  
2 constitutional authority when it enacted A.R.S. § 16-103(E) and nothing in Ariz. Const.  
3 art. VII, § 2(A) prevented it from doing so.

4 Arizona’s constitutional provisions demonstrate clearly that there is no one-size-  
5 fits-all constitutional definition of residence. Arizona Constitution art. VII, § 12 provides  
6 that “[t]here shall be enacted registration and other laws to secure the purity of elections  
7 and guard against abuses of the elective franchise.” Article VII, “Suffrage and Elections,”  
8 contains three provisions that mention residence, but none of those provisions define  
9 residence in a way that would bar the Legislature from enacting A.R.S. § 16-103(E).  
10 Specifically, Ariz. Const. art. VII, § 3 provides that “no person shall be deemed to have  
11 gained or lost a residence by reason of being present or absent” due to federal  
12 employment, school attendance, institutionalization, or incarceration. While Ariz. Const.  
13 art. VII, § 6 provides that military personnel shall not be “deemed a resident of this state”  
14 simply as a consequence of being stationed in Arizona. Finally, art. VII, § 2(A), which  
15 is at issue in this case, refers to a durational residence requirement to be “prescribed by  
16 law.” It further provides broadly that “qualifications for voters at a general election for  
17 the purpose of electing presidential electors shall be as prescribed by law.” *Id.* In short,  
18 the Arizona Constitution vests the Legislature with the authority to define residence,  
19 including exceptions thereto, for purposes of voter registration.

20 Exercising that constitutional authority, the Legislature enacted A.R.S. § 16-  
21 101(B), which provides that for purposes of A.R.S. Title 16, “‘resident’ means an  
22 individual who has actual physical presence in this state . . . combined with an intent to  
23 remain.” The Legislature also provided that “[e]very resident of this state is qualified to  
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26 <sup>5</sup> Federal statutes limit what states can do with respect to durational residence  
27 requirements. In particular, the Voting Rights Act and National Voter Registration Act  
28 bar durational residence requirements over 30 days. *See* 52 U.S.C. § 10502(d) (limiting  
states’ ability to impose durational residence requirements for voting for President and  
Vice President); 52 U.S.C. § 20507(a)(1) (permitting durational residence requirements  
of not more than thirty days).

1 register to vote if the resident” meets six other eligibility requirements. A.R.S. § 16-  
2 101(A). And it created an exception to the “actual physical presence” aspect of the  
3 definition. *See* A.R.S. § 16-103(A)-(B). The Legislature further enacted A.R.S. § 16-  
4 103(E) to provide that a certain subset of adult United States citizens may register to vote  
5 for federal offices even if they do not meet the definition of resident in A.R.S. § 16-  
6 101(B). Specifically, “[a]ny United States citizen who has never resided in the United  
7 States and whose parent is a United States citizen who is registered to vote in this state is  
8 eligible to register to vote and may vote in this state using a federal write-in early ballot  
9 as prescribed by § 16-543.02.” A.R.S. § 16-103(E).

10 Section 16-103(E) may be viewed as supplementing the voter qualifications set  
11 forth in A.R.S. § 16-101 or as an exception to those requirements. In particular, A.R.S.  
12 § 16-101 lists qualifications to register to vote, but it does not bar the Legislature from  
13 enacting laws that include different qualifications and extend the right to vote in Arizona  
14 to people who do not meet the requirements set forth in A.R.S. § 16-101(A), provided  
15 they do not conflict with the express bars to registration in Ariz. Const. art. VII, § 2(C).  
16 But even if the Court were to read A.R.S. § 16-101(A)’s registration qualifications as  
17 exclusive, then A.R.S. § 16-103(E) conflicts with A.R.S. § 16-101. And as the later-  
18 enacted and more specific statute, A.R.S. § 16-103(E) controls for that small subset of  
19 adult children of UOCAVA voters who have never resided in the United States but meet  
20 the constitutional age and citizenship requirements. *See Baker v. Gardner*, 160 Ariz. 98,  
21 101 (1988) (“Courts construe seemingly conflicting statutes in harmony when possible.  
22 However, when two statutes truly conflict, either the more recent or more specific  
23 controls.”) (citations omitted).<sup>6</sup> Either way, it is within the Legislature’s authority to  
24 decide voter qualifications that are not plainly established or barred by the Constitution.

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27 <sup>6</sup> The Legislature adopted the general definition of resident in A.R.S. § 16-101(B) in 1991,  
28 long before it enacted A.R.S. § 16-103(E) in 2005. *See* 1991 Ariz. Sess. Laws, ch. 1, § 2  
(40th Leg., 3rd Spec. Sess.).



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RESPECTFULLY SUBMITTED this 8th day of September, 2025.

**KRISTIN K. MAYES**  
**ATTORNEY GENERAL**

By /s/ Syreeta A. Tyrell  
Hayleigh S. Crawford  
Syreeta A. Tyrell  
Alexa G. Salas

*Attorneys for Defendant the  
State of Arizona*

By /s/ Karen J. Hartman-Tellez  
Karen J. Hartman-Tellez  
Kara Karlson  
Kyle Cummings

*Attorneys for Defendant Arizona  
Secretary of State Adrian Fontes*

1 The foregoing document was electronically filed  
2 and served through AZTurboCourt  
3 this 8th day of September, 2025 to:

4 Hon. Michael Herrod  
5 Maricopa County Superior Court  
6 101 West Jefferson Street  
7 ECB 911  
8 Phoenix, Arizona 85003

9 Kory Langhofer  
10 Thomas Basile  
11 Statecraft PLLC  
12 649 North Fourth Avenue, First Floor  
13 Phoenix, Arizona 85003  
14 [kory@statecraftlaw.com](mailto:kory@statecraftlaw.com)  
15 [tom@statecraftlaw.com](mailto:tom@statecraftlaw.com)

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/s/Monica Quinonez