

1 VERONICA LUCERO, ESQ.
2 Davillier Law Group
3 4105 North 20th Street, Suite 110
4 Phoenix, Arizona 85016
5 State Bar No. #030292
VLucero@DavillierLawGroup.com
6 (602) 730-2985 Ext. 701

7 *Lead Counsel for Advocates for Victims of Illegal Alien Crime*

8 **IN THE UNITED STATES DISTRICT COURT**
9 **FOR THE DISTRICT OF ARIZONA**

10
11 MI FAMILIA VOTA,

12
13 PLAINTIFF,

14 v.

15 ADRIAN FONTES, IN HIS OFFICIAL
16 CAPACITY AS ARIZONA SECRETARY
17 OF STATES, ET AL.,

18 DEFENDANTS.

19
20 AND CONSOLIDATED CASES

CASE NO.: 2:22-CV-00509-SRB (LEAD)

21 NO. CV-22-00519-PHX-SRB NO. CV-22-
22 01003-PHX-SRB NO. CV-22-01124-PHX-
23 SRB NO. CV-22-01369-PHX-SRB NO. CV-
24 22-01381-PHX-SRB NO. CV-22-01602-PHX-
25 SRB NO. CV-22-01901-PHX-SRB

26
27 **MEMORANDUM OF LAW AS *AMICUS CURIAE* IN SUPPORT OF ARIZONA'S ELECTION**
28 **LAWS FROM ADVOCATES FOR VICTIMS OF ILLEGAL ALIEN CRIME**

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Lorraine G. Woodwark
By /s/ Lorraine G. Woodwark, Esq.
Attorneys United for a Secure America
25 Massachusetts Avenue NW, Ste 335
D.C. 20001
(202) 591-0962
(202) 464-3590
LWoodwark@IRLI.org

Veronica Lucero
By /s/Veronica Lucero, Esq.
Davillier Law Group
4105 North 20th Street, Washington,
Suite 110
Phoenix, AZ 85016
(602) 730-2985 Ext. 701
VLucero@DavillierLawGroup.com

Carson J. Tucker, Esq.
By /s/ Carson J. Tucker, Esq.
Lex Fori PLLC
DPT #3020
1250 W. 14 Mile Rd.
Troy, MI 48083-1030
Direct +17348879261
Main +17348879260
Fax +17348879255
www.lexforipllc.com
cjtucker@lexfori.org

Counsel for *Amicus Curiae*
Advocates for Victims of Illegal Alien Crime

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INTRODUCTION

On March 30, 2022, Arizona’s House Bill 2492 (A.R.S. 16-166) was signed into law requiring Arizonians to provide proof of U.S. Citizenship and jurisdictional residency to register and vote in Arizona elections. On January 1, 2023, the amended statutes went into effect. House Bill 2243 (A.R.S. 16-101(E)), requires the County Recorder to review the voter rolls each month and purge persons who the County Recorder believes are not citizens or whom are no longer residents, and to comply with the law’s other duties ensuring that only U.S. citizens may register and vote in Arizona elections. These new laws streamlined the former patchwork of Arizona’s election laws to improve election integrity and to ensure consistency so that all eligible voters are treated equally. Both of these new laws are consistent with the National Voters Registration Act’s (NVRA) stated goals both to encourage eligible voters to register as well as mandate election officials to purge ineligible voters from the rolls. Arizona’s new laws also comply with the United States Constitution’s requirement that only United States citizens may vote in elections.

19 The United States Government and several Plaintiff groups sued to override both
20 the United States Constitution’s requirements that only U.S. citizens vote in elections and
21 Arizona’s House Bills 2492, which requires proof of U.S. citizenship to vote in elections,
22 and 2243, which require Election Offices to purge ineligible voters from their rolls. The
23 non-U.S. citizen plaintiffs are curiously participating in this case even though they are not
24 eligible to vote in U.S. elections. Remarkably, Arizona, through the attorney general’s
25 office, has filed a motion for partial summary judgment asking the Court to decide the
26 issues of law, has agreed that “U.S. citizenship is a basic requirement for voting” and
27
28

1 urge the Court to uphold Arizona’s voting laws. Arizona’s Motion for Partial Summary
2 Judgment, Docket #364, pp. 14-15.

3 **ARGUMENTS**

4 **1. THE RIGHT TO VOTE IS A FUNDAMENTAL RIGHT SECURED**
5 **ONLY FOR ELIGIBLE U.S. CITIZENS**

6 Requiring Proof of citizenship is constitutional. The right to vote is exclusively for
7 U.S. Citizens and described by the United States Supreme Court as “the honorable
8 prerogative which no alien has a constitutional right to enjoy. *Foley v. Connelie*, 435 U.S.
9 291, 311; 98 S. Ct. 1067; 55 L. Ed. 287 (1978). Therefore, “it is clear that a State may
10 deny aliens the right to vote;” and “the right to participate in the making of policy...” *Id.*
11 at 291, 296-97. These principles “lie at the heart of our political institutions.” *Id.* at 291,
12 citing *Sugarman v. Dougall*, 413 U.S. 634, 647; 93 S. Ct. 2842; 37 L. Ed. 2d 853 (1973).
13 Plaintiffs have overlooked the fact that Arizona’s law is complimentary to the National
14 Voter Registration Act of 1993 (NVRA), 42 U.S.C.S. § 1973 et seq., which enshrines
15 into law the Supreme Court’s previous statement in *Foley*. Requiring Proof of citizenship
16 is constitutional. The NVRA states that its purposes are:

- 17 (1) “to establish procedures that will increase the number of *eligible citizens*
18 who register to vote in elections for Federal office;
19 (2) to make it possible for Federal, State, and local governments to
20 implement this chapter in a manner that enhances the participation
21 of *eligible citizens as voters* in elections for Federal office;
22 (3) to *protect the integrity of the electoral process*; and
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1 (4) to ensure that accurate and current voter registration rolls are
2 maintained.” (emphasis added).

3 The word “citizen” as defined by several dictionaries, including the Britannica
4 Dictionary, is a “person who legally belongs to a country and has the rights and
5 protection of that country.”¹ Citizenship, therefore, is fundamental to the right to vote
6 and maintaining the Constitution’s promise that votes must not be canceled out or
7 nullified by the tabulation of ineligible votes. Non-citizens must be prohibited from
8 voting, as their doing so would dilute votes of U.S. citizens and affect the outcome of
9 elections, which are supposed to be representative of the choice of lawful U.S. citizens.
10 As the Supreme Court has confirmed on multiple occasions, an infringement upon this
11 right occurs where a legal citizen’s vote is diluted or nullified. Thus, a citizen’s right to a
12 vote free of arbitrary impairment by state action has been judicially recognized as a right
13 secured by the Constitution, when such impairment resulted from dilution by a false tally,
14 cf. *United States v. Classic*, 313 U.S. 299, 314-15; 61 S. Ct. 1031; 85 L. Ed. 1355 (1915);
15 or by stuffing of the ballot box, cf. *Ex parte Siebold*, 100 U.S. 371, 388; 25 L. Ed. 717
16 (1879); *United States v. Saylor*, 322 U.S. 385, 389; 64 S. Ct. 1101; 88 L. Ed. 1341
17 (1944). See also *Baker v. Carr*, 369 U.S. 186, 208; 82 S. Ct. 691; 7 L. Ed. 2d 663 (1962).
18 This nullification of an individual choice occurs whenever any illegitimate vote is cast,
19 whether it be by a non-citizen, a non-registered, or a non-existent “voter”. *Reynolds v.*
20 *Sims*, 377 U.S. 533, 565; 84 S. Ct. 1362, 1383; 12 L. Ed. 2d 506 (1964) (“each citizen
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¹ <https://www.britannica.com/dictionary/citizen> (last checked May 22, 2023)

1 [has] an equally effective voice in the election... and the Constitution demands, no
2 less.”).

3 Thus, it is no surprise that the NVRA includes the term “eligible citizens” as part
4 of the requirements for voter eligibility, which are that one must be a U.S. citizen, be 18
5 years or older, meet one’s State’s residency requirements, and be registered to vote by
6 that State’s voter registration deadline. NVRA includes in its list of persons not eligible
7 to vote: non-citizens, including lawful permanent residents.²
8
9

10 The United States Constitution’s requirements that only U.S. citizens vote in
11 elections are reflected in Arizona’s House Bill 2492, which requires proof of U.S.
12 citizenship to vote in elections, and Bill 2243, which requires the County Recorder to
13 review the voter rolls each month and purge persons who the County Recorder believes
14 are not citizens, *id.* § 2(H), and comply with other duties to ensure that only U.S. citizens
15 may register and vote in Arizona elections.
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17

18 Every state has both the duty and right to prevent non-citizens from voting in local,
19 state, and national elections. U.S. Citizens demand nothing less. In fact, the United States
20 Constitution excludes non-citizens from the privilege, and with good reason. “Regulation
21 of the electoral process receives unusual scrutiny because ‘the right to exercise the
22 franchise in a free and unimpaired manner is preservative of other basic civil and political
23 rights.’” *Mathews v. Diaz*, 426 U.S. 67, 78-79, 96 S. Ct. 1883, 1890-91 (1976), quoting
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27 ² <https://www.usa.gov/who-can-vote> (last checked May 22, 2023)
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1 *Reynolds v. Sims*, 377 U.S. 533, 562; 84 S. Ct. 1362; 12 L.Ed.2d 506 (1964). See also,
2 *Dunn v. Blumstein*, 405 U.S. 330, 336; 92 S. Ct. 995; 31 L. Ed. 2d 274 (1972). In other
3 words, the “right to vote is accorded extraordinary treatment because it is, in equal
4 protection terms, an extraordinary right: a citizen cannot hope to achieve any meaningful
5 degree of individual political equality if granted an inferior right of participation in the
6 political process.” *Plyler v Doe*, 457 U.S. 202, 233; 102 S. Ct. 2382; 72 L. Ed. 2d 786, 810
7 (1982). The Constitution protects the privileges and immunities only of citizens, Amdt.
8 14, § 1; see Art. IV, § 2, cl. 1, and the right to vote only of citizens. Amdts. 15, 19, 24, 26.
9 *Mathews, supra* at 78-79, n. 12, *Foley, supra* at 291, *Sugarman, supra* at 647.

12 Not only does the Constitution protect citizens’ right to vote, but nothing in that
13 document could ever authorize the executive, legislative or judicial branch of the federal
14 government to force the states to allow non-citizens to exercise the same privileges
15 accorded citizens of the United States and of the several states. Moreover, a State has a
16 compelling right to preserve (and a compelling interest) in preserving the integrity of its
17 election process by ensuring that it protects against fraud and assures citizens of its integrity
18 so that they will exercise their right to vote with vigor and confidence that their
19 representative choice will be honored.

22 What the NVRA may not do is to dictate how each State legislates its election
23 laws. Citizenship and Arizona residency are both a requirement for voter eligibility in all
24 federal, state and local elections in the State of Arizona. County election offices must
25 regularly purge voter rolls of ineligible voters, including non-citizens. Federal statutes,
26 and any associated administrative forms, may not interfere with a State’s right to
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1 determine its own election laws. Their doing so, would violate the Tenth Amendment of
2 the U.S. Constitution. U.S. Const. Amend 10th (“The powers not delegated to the United
3 States by the Constitution, nor prohibited by it to the States, are reserved to the States
4 respectively...”).

6 More explicitly, not only does the Constitution protect the States from federal
7 overreach, but it protects the individual rights of citizens from overreach from either
8 government. Such overreach would occur if the federal government forced a State to
9 allow non-citizens to vote.

11 To this end, as an added measure of assurance, it is declared that “[t]he
12 enumeration in the Constitution, or certain rights, shall not be construed to deny or
13 disparage others retained by the people.” U.S. Const. Amend. 9. It was universally agreed
14 by the Framers that there are additional fundamental rights, protected from government
15 infringement, which exist alongside those specifically mentioned in the first eight
16 amendments. I Annual of Congress 439 (Gales and Seaton ed. 1834). See also II Story,
17 Commentaries on the Constitution of the United States (5th ed. 1891), pp. 626-626. “The
18 [Ninth Amendment... was proffered to quiet expressed fears that a bill of specifically
19 enumerated rights could not be sufficiently broad to cover all essential rights and that the
20 specific mention of certain rights would be interpreted as a denial that others were
21 protected.” *Marbury v. Madison*, 5 U.S. (1 Cranch) 137, 174 (1803). See also *Myers v.*
22 *United States*, 272 U.S. 52, 229; 47 S. Ct. 21, 63 (1926).

27 As “it cannot be presumed that any clause in the constitution is intended to be
28 without effect... effect should be given to all the words it uses.” *United Pub. Workers v.*

1 *Mitchell*, 330 U.S. 75, 94-96; 67 S. t. 556 (1947). And, indeed, a right to political
2 affiliation and political choice has been addressed as protected, at least in part, by the
3 amendment. This includes, of course, the fundamental right to vote. *Id.* See also
4
5 *Reynolds*, 377 U.S. at 560.

6 That the latter is the fundamental and primary right among all other fundamental
7 rights, enumerated or not, is evident in the fact it is self-executing. Infringement upon it
8 cannot occur under the Constitution if the government is, in fact, one that is duly and
9
10 legally chosen by the People. Any government that asserts a mandate on the basis of
11 fraud or illegality effectuates an instant infringement on the will of the People, and, of
12 necessity, has no legitimacy. More specifically, the Supreme Court has described the
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14 privilege to vote as a fundamental constitutional right preservative of all others. *Yick Wo*
15 *v. Hopkins*, 118 U.S. 356, 370, 6 S. Ct. 1064, 1071, 30 L. Ed. 220, 226 (1886). As the
16 Court later confirmed, an infringement upon this right occurs where a legal citizen’s vote
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18 is diluted or nullified. This nullification of an individual choice occurs whenever any
19 illegitimate vote is cast, whether it be by a non-citizen, a non-registered voter, or a non-
20
21 existent “voter”. *Reynolds*, *supra* at 565; 84 S. Ct. 1362, 1383’ 12 L. Ed.2d 506 (1964).

22 The NVRA form is an optional federal form narrowly tailored to limit
23 constitutional overreach into a State’s legislative authority to draft and amend their own
24
25 election laws. See U.S. Const. Art. I, §4. (“each State by the Legislature thereof...”).
26 Congress never intended the NVRA form to be used as a loophole, by noncitizens, to
27
28 register and vote in elections. States have full authority to enact election laws to protect
election integrity. Nowhere does the NVRA expressly prohibit the States from requiring

1 valid proof of citizenship, and in fact it could not do. See *Arizona v. Inter Tribal Council*
2 *of Ariz., Inc.*, 570 U.S. 1, 1, 133 S. Ct. 2247, 2249 (2013). Ironically, Section 5 of the
3 NVRA requires that “[t]he voter registration application must state each voter eligibility
4 (including citizenship) ...” 52 U.S.C. § 20507(5). The use of the NVRA does not negate
5 or void a citizenship requirement, but it mandates one.

7 **2. ARIZONA’S ELECTION LAW AMENDMENTS PROTECT THE**
8 **INTEGRITY OF THE ELECTORAL PROCESS**
9

10 Election integrity requires preventing non-citizen or deceased persons from voting,
11 multi-voting, and other ineligible individuals from casting votes. While the NVRA
12 pertains to federal elections, permitting voting by ineligible voters in state and local
13 elections can impact federal election voting. The federal government and states are
14 mandated to ensure election laws are followed and consistently so.

16 Arizona’s new laws, effective January 1, 2023, require county election offices to
17 verify voter eligibility and clean voter registration rolls. Election integrity is of primary
18 importance for U.S. Citizen voters to protect against multi-voting, deceased and ineligible
19 voters that must now be removed from voter rolls. Prevention and removal of ineligible
20 voters are part of the NVRA requirements:
21

23 “(4) conduct a general program that makes a reasonable effort to
24 remove the names of ineligible voters from the official lists of eligible
25 voters by reason of—

25 (A) the death of the registrant; or

26 (B) a change in the residence of the registrant, in accordance with
27 subsections (b), (c), and (d);

27 (5) inform applicants under sections 20504, 20505, and 20506 of this
28 title of—

(A) voter eligibility requirements; and

1 (B) penalties provided by law for submission of a false voter
2 registration application; and
3 (6) ensure that the identity of the voter registration agency through
4 which any particular voter is registered is not disclosed to the public.”

5 52 U.S.C. § 20505.

6 A recent Arizona news article aptly highlights the need for proof of citizenship
7 verification as well as purging voter rolls of ineligible voters. In Maricopa county, the
8 article noted that “more than 200 self-acknowledged noncitizens have managed to
9 register to vote in Arizona’s Maricopa County and at least nine of them have cast ballots
10 in federal elections...”³ Since 2015, only 222 registered non-citizens were honest enough
11 to come forward and notify officials of the registration error. This means that, as the
12 fourth largest county, there are possibly hundreds or thousands more ineligible voters on
13 Maricopa’s and other county’s voter rolls. One of the reasons, these individuals came
14 forward may be that “immigrants seeking citizenship often come forward and
15 acknowledge that they are on the rolls because one of the questions on the naturalization
16 form is whether they ever were illegally registered. Lying on that form can quickly earn
17 deportation.” The penalties for fraudulent voter registration are a class 6 felony which
18 would mean automatic removal from the U.S.⁴ See A.R.S. Title 6, 16-182 (A). This
19 means that Arizona’s election offices have much work to not only to purge ineligible
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25 _____
26 ³ <https://www.washingtontimes.com/news/2023/apr/25/hundreds-noncitizens-ended-voting-rolls-maricopa-c/>

27 ⁴ A person who knowingly causes, procures or allows himself to be registered as an elector of any county, city, town,
28 district or precinct, knowing that he is not entitled to such registration, or a person who knowingly causes or procures
another person to be registered as an elector of any county, city, town, district or precinct, knowing that such other
person is not entitled to such registration, or an officer who knowingly enters the name of any person not entitled to
registration upon the register or roll of electors, is guilty of a class 6 felony.

1 voters but to prevent more ineligible voters from registering as is mandated by both the
2 NVRA and Arizona's elections laws.

3 Election integrity is of primary importance for U.S. Citizen voters to protect against
4 non-citizen voting, multi-voting, and deceased and ineligible voters that must now be
5 removed from voter rolls. Election integrity also increases the number of qualified U.S.
6 citizens who register and vote in elections, something that the NVRA was designed to
7 encourage.
8
9

10 CONCLUSION

11 Arizona's enacted election laws are constitutional and must be upheld.

12 Respectfully submitted, this May 22, 2023.

13
14 Lorraine G. Woodwark
15 By /s/ Lorraine G. Woodwark, Esq.
16 Attorneys United for a Secure America
17 25 Massachusetts Avenue NW, Ste 335
18 D.C. 20001
19 (202) 591-0962
20 (202) 464-3590
LWoodwark@IRLI.org

Veronica Lucero
By /s/Veronica Lucero, Esq.
Davillier Law Group
4105 North 20th Street, Washington,
Suite 110
Phoenix, AZ 85016
(602) 730-2985 Ext. 701
VLucero@DavillierLawGroup.com

21 Carson J. Tucker, Esq.
22 By /s/ Carson J. Tucker, Esq.
23 Lex Fori PLLC
24 DPT #3020
25 1250 W. 14 Mile Rd.
26 Troy, MI 48083-1030
27 Direct +17348879261
28 Main +17348879260
Fax +17348879255
www.lexforipllc.com
cjtucker@lexfori.org

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*Counsel for Amicus Curiae
Advocates for Victims of Illegal Alien
Crime (AVIAC)*

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CERTIFICATE OF COMPLIANCE

1. This brief has been prepared using 13-point, proportionately spaced, serif typeface, in Microsoft Word.

2. This brief complies with FED. R. APP. P. 29(a)(5) and 32(a)(7)(B) because it contains a total of 2,664 words, excluding material not counted under Rule 32(f).

Dated: May 22, 2023

s/ Veronica Lucero

VERONICA LUCERO, ESQ.
Davillier Law Group
4105 North 20th Street, Suite 110
Phoenix, Arizona 85016
State Bar No. #
email
(602) 730-2985 Ext. 701

*Counsel for Amicus Curiae Advocates
for Victims of Illegal Alien Crime*

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CERTIFICATE OF SERVICE

I hereby certify that on May 22, 2023, I electronically filed the foregoing amicus brief in Support of Arizona’s Election Laws with the Clerk using the CM/ECF system, which I understand to have served the parties’ counsel who are registered in as CM/ECF users.

/s/ Veronica Lucero
VERONICA LUCERO, ESQ.
Davillier Law Group
4105 North 20th Street, Suite 110
Phoenix, Arizona 85016
State Bar No. #
VLucero@DavilierLawGroup.com
(602) 730-2985 Ext. 701

Lead Counsel for Movant