

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

LEAGUE OF UNITED LATIN AMERICAN
CITIZENS, *et al.*,

Plaintiffs,

v.

EXECUTIVE OFFICE OF THE PRESIDENT,
et al.,

Defendants.

Civil Action No. 25-0946 (CKK)

DEMOCRATIC NATIONAL COMMITTEE,
et al.,

Plaintiffs,

v.

DONALD J. TRUMP, *et al.*,

Defendants.

Civil Action No. 25-0952 (CKK)

LEAGUE OF WOMEN VOTERS
EDUCATION FUND, *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP, *et al.*,

Defendants.

Civil Action No. 25-0955 (CKK)

**UNOPPOSED MOTION OF RESTORING INTEGRITY AND TRUST IN ELECTIONS
AND THE REPUBLICAN PARTY OF ARIZONA FOR LEAVE TO FILE A BRIEF AS
AMICI CURIAE**

Pursuant to LCvR 7(o), Restoring Integrity and Trust in Elections, Inc. (“RITE”) and the Republican Party of Arizona, LLC (“RPAZ”) respectfully request leave to file the accompanying brief as *amici curiae* in support of Defendants’ Motion for Partial Summary Judgment. Counsel for the parties have represented that they do not object to the filing of the brief.

This Court has “broad discretion” to permit amicus curiae participation. *Nat’l Ass’n of Home Builders v. U.S. Army Corps of Engineers*, 519 F. Supp. 2d 89, 93 (D.D.C. 2007). It generally permits third parties to participate as *amici curiae* when they have “relevant expertise and a stated concern for the issues at stake in [the] case.” *District of Columbia v. Potomac Elec. Power Co.*, 826 F. Supp. 2d 227, 237 (D.D.C. 2011). Specifically, this Court has allowed the filing of *amicus* briefs in cases where a third party has “unique information or perspective” that can contribute to the Court’s understanding of the matter in question and assist the Court in the resolution of legal or factual questions. *Jin v. Ministry of State Sec’y*, 557 F. Supp. 2d 131, 137 (D.D.C. 2008).

The RPAZ is a statewide political party committee under Arizona law, and the organizing body of Arizona electors who are registered members of the Republican Party, the largest political party in Arizona. The RPAZ sponsors and engages in large-scale voter registration efforts, and promotes the election of Republican candidates in Arizona.

RITE is a nonprofit organization committed to ensuring that electoral systems are designed, safeguarded, and implemented in a manner that reflects the will of citizens so that electoral results enjoy the public’s full faith and confidence. *See* Our Mission, Restoring Integrity and Trust in Elections, <https://riteusa.org/our-mission/> (as last visited Aug. 13, 2025). RITE supports litigation nationwide, in federal and state courts, to protect democratically enacted election laws from attack and abuse by partisan actors and challenging official actions which threaten or dilute the right of

qualified citizens to vote. *See id.* RITE defends duly enacted laws that prioritize the interests of voters, opposes laws that grant voting rights to non-citizens, opposes unlawful executive and administrative actions to evade their responsibility to enforce election rules, and advocates for election rules as enacted by legislatures rather than judicial fiat. *See id.*

Both *amici* have direct and substantial interests in the subject matter of this litigation and the relief that the Plaintiffs seek. Executive Order No. 14248, *Preserving and Protecting the Integrity of American Elections*, 90 Fed. Reg. 14005 (Mar. 25, 2025) (the “Executive Order”), regulates voter registration procedures and thus the security of the electoral process. The Executive Order’s provisions—and, by extension, any injunctions prohibiting their implementation—necessarily structure and condition the competitive environment in which the electoral system and its participants (including the RPAZ) operate. *See Shays v. Fed. Election Comm’n.*, 414 F.3d 76, 86 (D.C. Cir. 2005) (recognizing political actors’ interests in regulatory developments that “alter the competitive environment’s overall rules”).

As an Arizona-based organization, RPAZ’s perspective on the use of documentary proof of citizenship in voter registration carries particular salience. Since 2004, Arizona has been virtually alone among the 50 states in requiring voters who use the state voter registration form to provide documentary proof of citizenship. *See* Ariz. Rev. Stat. §§ 16-166(F), 16-121.01(C). The Executive Order would adapt Arizona’s regulatory approach to the Federal Form published by the Election Assistance Commission (“EAC”). Under Arizona’s unique bifurcated voter registration system, individuals who register with the Federal Form and who do not have proof of citizenship on file with the state are designated as “federal-only” voters, and are ineligible to vote in state and local elections. *See* Ariz. Atty. Gen. Op. I13-011, 2013 WL 5676943 (Oct. 7, 2013). By extending

the documentary proof of citizenship criterion to the Federal Form, the Executive Order ensures a more uniform and secure voter registration framework both in Arizona and nationwide.

The RPAZ and related Republican Party organizations have participated as parties and *amici* in various iterations of the long-running litigation arising out of Arizona’s proof of citizenship laws. *E.g.*, *Mi Familia Vota v. Fontes*, 129 F.4th 691 (9th Cir. 2025) (petition for rehearing *en banc* pending). The Republican National Committee recently obtained from the U.S. Supreme Court a stay of an injunction against the enforcement of an Arizona statute that requires registrants using Arizona’s state registration form to provide proof of citizenship. *See Republican Nat’l Comm. v. Mi Familia Vota*, 145 S. Ct. 108 (Mem.) (2024). RITE likewise has “relevant expertise and a stated concern for the issues at stake,” and can provide “unique information” that will assist the court in the disposition of the parties’ summary judgment motions. *Potomac Elec. Power Co.*, 826 F. Supp. 2d at 237; *Jin*, 557 F. Supp. 2d at 137.

The crux of the *amici*’s argument is that the U.S. Supreme Court has explicitly, *see ICTA*., 570 U.S. at 12, and implicitly, *see Republican Nat’l Comm.*, 145 S. Ct. at 108, concluded that documentary proof of citizenship is—or at least can be—“necessary to enable the appropriate State election official to assess the eligibility of the applicant and to administer voter registration and other parts of the election process,” within the meaning of the NVRA. 52 U.S.C. § 20508(b)(2). It follows that, regardless of whether or in what manner the President can direct the EAC’s proceedings, the NVRA undoubtedly authorizes a proof of citizenship component in the Federal Form.

The *amici* are concerned that the Democratic Party Plaintiffs’ misinterpretation of the NVRA to categorically preclude any documentary proof of citizenship requirement in federal elections embodies a consequential interpretative error that, if accepted by the Court, would

conflict with *ICTA* and the Supreme Court’s interim order in the ongoing Arizona litigation, as well as carry disruptive and deleterious repercussions for the RPAZ’s (and others’) voter registration activities in Arizona. *See Jin*, 557 F. Supp. 2d at 137 (an *amicus* brief should be allowed when “the *amicus* has an interest in some other case that may be affected by the decision in the present case”). The *amici* have drawn on their extensive familiarity with the statutory complexities to proffer a more in-depth and comprehensive analysis of the textual nuances and relevant case law than the parties’ briefs (which necessarily devote their limited pages to multiple other claims and issues) can provide. *Cf. Hard Drive Prods., Inc. v. Does 1-1*, 495, 892 F. Supp. 2d 334, 338 (D.D.C. 2012) (finding proposed *amicus* brief “helpful” because it addressed “an issue not developed fully in” the parties’ submissions).

Accordingly, the RPAZ and RITE respectfully request leave to file their proposed brief as an *amici curiae*.

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Respectfully submitted,

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