

**Davillier Law Group, LLC**

4105 North 20<sup>th</sup> Street Suite 110

Phoenix, Arizona 85016

Telephone: (602) 730-2985 / Facsimile: (602) 801-2539

1 Alexander Kolodin (SBN 030826)  
 Arno Naeckel (SBN 026158)  
 2 Roger Strassburg (SBN 016314)  
 Veronica Lucero (SBN 030292)  
 3 **Davillier Law Group, LLC**  
 4 AKolodin@DavillierLawGroup.com  
 ANaeckel@DavillierLawGroup.com  
 5 RStrassburg@DavillierLawGroup.com  
 VLucero@DavillierLawGroup.com  
 6 PhxAdmin@davillierlawgroup.com (file copies)  
 7 4105 North 20<sup>th</sup> Street Ste. 110  
 Phoenix, AZ 85016  
 8 Telephone: (602) 730-2985  
 9 Facsimile: (602) 801-2539

10 *Attorneys for Plaintiffs*

11 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**  
 12 **IN AND FOR THE COUNTY OF MARICOPA**

14 ARIZONA REPUBLICAN PARTY, a  
 15 recognized political party; YAVAPAI  
 16 COUNTY REPUBLICAN COMMITTEE,  
 the Yavapai County committee of the  
 17 Arizona Republican Party; LOIS  
 FRUHWIRTH, Chairwoman of the Yavapai  
 18 County Republican Committee; ANNE  
 19 ROPER, Secretary of the Yavapai County  
 Republican Committee;

20 *Plaintiffs,*

21 v.

22 YAVAPAI COUNTY ELECTIONS  
 23 DIRECTOR;

24 *Defendant,*

25 STATE OF ARIZONA, a body politic.;

26 *Defendant and Real-Party-In-Interest.*

No.

**VERIFIED COMPLAINT**  
**[Show Cause Hearing Requested]**

*Election-Related Matter*

27  
28 Plaintiffs, for their complaint against Defendants, allege as follows:

**Davillier Law Group, LLC**

4105 North 20th Street Suite 110

Phoenix, Arizona 85016

Telephone: (602) 730-2985 / Facsimile: (602) 801-2539

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## OVERVIEW

1. This suit seeks to enjoin unconstitutional legislation—HB 2839—that disenfranchises Arizona voters and candidates by extinguishing their right to vote and run for political party precinct committeemen (sometimes “PCs”) in the upcoming 2022 primary election. The bill was passed, by mistake, on March 3 of this year.

2. Specifically, this Complaint challenges the lawfulness of Sec. 4 of the bill, as well as the use of an emergency clause in Sec. 5 of the bill to bring the provisions of Sec. 4 into effect immediately. Section 4 reads as follows:

**Sec. 4. 2022 election cycle; precinct committeemen; county party committee; board of supervisors**

Notwithstanding any other law, for the 2022 election for political party precinct committeemen only, the following apply:

1. Candidates for precinct committeeman shall submit to their county political party committee a nomination paper or other similar written statement of candidacy not later than April 18, 2022 and shall not be required to submit a nomination petition or file other documents with a filing officer.

2. The county political party committee shall verify the potential candidates’ eligibility based on the April 1 voter registration totals prescribed by section 16-168, subsection G, Arizona Revised Statutes.

3. Not later than May 2, 2022, the county political party committee shall submit to the county board of supervisors one precinct committeeman candidate’s name for each election precinct in the county for appointment pursuant to section 16-410 and section 16-822, subsection B, Arizona Revised Statutes. The county political party committee is the sole determiner of the single political party precinct committeeman candidate whose name is to be submitted for appointment from each election precinct in the county.

4. The county board of supervisors shall appoint the political party precinct committeemen from the names submitted pursuant to paragraph 3 of this section. Precinct committeemen who are appointed pursuant to this section for the 2022 term of office are deemed elected precinct committeemen for all purposes.

5. For any vacancies in the office of precinct committeeman that occur during the 2022 term of office, the county political party committee shall appoint eligible persons to fill those vacancies and shall maintain a current roster of precinct committeemen for the remainder of the 2022 term, and no further action regarding vacancies is required by the county board of supervisors.<sup>1</sup>

## PARTIES, JURISDICTION, AND VENUE

3. Plaintiffs incorporate the preceding paragraphs by reference.

4. Plaintiff Arizona Republican Party (sometimes “AZGOP”) is a recognized political party in Arizona.

5. Plaintiff Yavapai County Republican Committee is the Yavapai County arm of the AZGOP.

<sup>1</sup> <https://www.azleg.gov/legtext/55leg/2R/laws/0003.pdf>

1 6. Plaintiffs Fruhwirth and Roper are elected PCs and officers of the Yavapai County  
2 Republican Committee.

3 7. Defendant Yavapai County Elections Director is the public official tasked with  
4 overseeing elections in Yavapai County. The officer themselves is not specifically  
5 identified, pursuant to ARCP 17(d), as they are merely named so that an injunction, if  
6 necessary, may be entered against them prohibiting them from enforcing the State’s  
7 unconstitutional law or, alternatively, prohibiting them from enforcing it in a manner  
8 contrary to the legislature’s intent.

9 8. Defendant and real-party-in-interest State of Arizona (“State”) is a body politic.

10 9. The “core constitutional authority and duty” of this Court is to declare whether  
11 statutes are constitutional and construe their intent. *Ariz. Sch. Bds. Ass’n v. State*, 501 P.3d  
12 731, 737 (Ariz. 2022), *see also* ARS. 12-1831 – 1846.

13 10. This court has jurisdiction over this action and venue is proper in Yavapai County  
14 pursuant to A.R.S. § 12-401 and other applicable law.

15 **FACTS**

16 11. Plaintiffs incorporate the preceding paragraphs by reference.

17 12. On March 3, 2022, the Arizona Legislature passed HB 2839: misleadingly entitled,  
18 “candidate nominations; signatures; redistricting.”

19 13. HB 2839 passed the House unanimously by a vote of 58-0 and passed the Senate by  
20 a unanimous vote of 28-0.

21 14. Typically, legislation is subject to extensive review and vetting before it is enacted.  
22 It is first assigned to a committee, which holds public hearings and in total, is read and  
23 reviewed at least three times before being enacted.

24 15. This was not the case with HB 2839. HB 2839 never went through the committee  
25 process or had a first or second read. It was instead presented to the body, for the first time,  
26 just a few minutes before the members were to vote on it.

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16. Ordinarily changes from existing law are clearly indicated in blue capital letters in a bill so that legislators know what they are voting on. Indeed, most of the changes to existing law in HB 2839 were clearly indicated in blue, capital, letters, as per the following example from HB 2839:

43 C. NOTWITHSTANDING ANY OTHER LAW, THE NUMBER OF SIGNATURES REQUIRED  
44 FOR A 2022 LEGISLATIVE CANDIDATE'S NOMINATION PETITION SHALL BE THE LESSER  
45 OF THE FOLLOWING:

17. However, the provisions of HB 2839 at issue here were not:

22 Sec. 4. 2022 election cycle; precinct committeemen; county  
23 party committee; board of supervisors  
24 Notwithstanding any other law, for the 2022 election for political  
25 party precinct committeemen only, the following apply:  
26 1. Candidates for precinct committeeman shall submit to their  
27 county political party committee a nomination paper or other similar  
28 written statement of candidacy not later than April 18, 2022 and shall not  
29 be required to submit a nomination petition or file other documents with a  
30 filing officer.  
31 2. The county political party committee shall verify the potential  
32 candidates' eligibility based on the April 1 voter registration totals  
33 prescribed by section 16-168, subsection G, Arizona Revised Statutes.  
34 3. Not later than May 2, 2022, the county political party committee  
35 shall submit to the county board of supervisors one precinct committeeman  
36 candidate's name for each election precinct in the county for appointment  
37 pursuant to section 16-410 and section 16-822, subsection B, Arizona  
38 Revised Statutes. The county political party committee is the sole  
39 determiner of the single political party precinct committeeman candidate  
40 whose name is to be submitted for appointment from each election precinct  
41 in the county.  
42 4. The county board of supervisors shall appoint the political  
43 party precinct committeemen from the names submitted pursuant to paragraph  
44 3 of this section. Precinct committeemen who are appointed pursuant to

- 6 -

H.B. 2839

1 this section for the 2022 term of office are deemed elected precinct  
2 committeemen for all purposes.  
3 5. For any vacancies in the office of precinct committeeman that  
4 occur during the 2022 term of office, the county political party committee  
5 shall appoint eligible persons to fill those vacancies and shall maintain  
6 a current roster of precinct committeemen for the remainder of the 2022  
7 term, and no further action regarding vacancies is required by the county  
8 board of supervisors.  
9 Sec. 5. Emergency  
10 This act is an emergency measure that is necessary to preserve the  
11 public peace, health or safety and is operative immediately as provided by  
12 law.

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1           18. The title of HB 2839 also gave no notice to the members of the body that by passing  
2 the bill, they would be disenfranchising the almost three million Arizona voters who are  
3 registered Republicans, Democrats, and Libertarians by stripping them of the right to vote  
4 for precinct committeepersons.

5           19. Under the Arizona Constitution, legislation does not take effect until 90 days from  
6 the end of session. The Arizona Constitution, however, contains an exception for bills  
7 passed by a super-majority that are necessary to preserve the public peace, health, and  
8 safety. Unfortunately, HB 2839 contained an emergency clause.

9           20. A super-majority of the Legislature passed HB 2839 Sec. 4, and appended an  
10 emergency clause to it, by mistake. Or, at least, enough members of the legislature voted  
11 for the bill by mistake that it would not have passed, or would not have passed with an  
12 emergency clause, had members known of its contents.

13           21. HB 2839 was signed by the Governor as an emergency measure, also on March 3,  
14 2022, and took effect immediately.

15           22. By its title, HB 2839 purported to be limited to the subject of “candidate  
16 nominations, signatures, and redistricting” but—without proper notice to legislators voting  
17 on the bill—actually *terminated* the candidate nomination process for political party  
18 precinct committeemen seeking to run for election and instead provided that precinct  
19 committeemen are to be appointed rather than elected for the 2022 election cycle only.

20           23. Upon information and belief, the bill was intended to standardize the number of  
21 signatures that congressional and legislative candidates need to get their names on the  
22 ballot to run for election because of the confusion created by a combination of changes to  
23 election laws in recent years, the redistricting process, and delays in the 2020 Census.

24           24. However, HB 2839 contained a poorly worded provision, upon information and  
25 belief, intended to address “split precincts,” but which actually discriminated against one  
26 class of candidates running for election—those candidates running for election to the office  
27 of precinct committeeperson in their political party for their precinct.  
28

1       25. HB 2839’s provision on precinct committeepersons differed radically from the other  
2 provisions in the bill.

3       26. The other provisions of the bill dealt with standardizing signature requirements for  
4 federal, state, and local candidates to get on the ballot to run for election.

5       27. Rather than dealing with signature requirements for party precinct  
6 committeepersons to get on the ballot to run for election, HB 2839 suppressed the rights of  
7 those party precinct committeepersons candidates to run for election no matter how many  
8 signatures each could collect.

9       28. HB 2839 also suppressed the rights of electors to vote for party precinct  
10 committeeperson candidates.

11       29. Instead of electing party precinct committeepersons, HB 2839 abolished those  
12 elections and imposed instead a system of appointments by the county supervisors from  
13 the list of candidates for appointment.

14       30. Even worse—HB 2839 abolished the rights of every 125 electors in their precinct  
15 to have one precinct committeeperson. Instead, each precinct—no matter its population—  
16 would only have one, unelected precinct committeeperson.

17       31. In reporting on this error, AZ Mirror reported:

18       *Lawmakers last week approved legislation intended to standardize the*  
19       *number of signatures that congressional and legislative candidates need to*  
20       *get their names on the ballot. The process was thrown into disarray and*  
21       *confusion by a combination of changes to election laws in recent years, the*  
22       *redistricting process and delays in the 2020 Census. The legislation was*  
23       *introduced and unanimously approved in less than a day so it would be in*  
24       *place on Monday, when candidates can legally begin submitting their*  
25       *nomination petitions to qualify for the ballot. The bill also included another*  
26       *provision, misunderstood or unread by many legislators, that makes drastic*  
27       *changes to the process for selecting party officials known as precinct*  
28       *committeemen.*

1 . . .

2 *House Majority Leader Ben Toma said those two provisions were*  
3 ***unintentional drafting errors**. The purpose of that section of the bill was to*  
4 *ensure that new precincts that are being redrawn because of the redistricting*  
5 *process get at least one PC.<sup>2</sup>*

6 32. The Arizona Republic reported: “[I]t appears no one actually read the bill.”<sup>3</sup>

7 33. And the Speaker of the House testified regarding Section 4 “I did not understand  
8 it.” He also testified that Sec. 4 “intimates” that there will also be elected PCs in addition  
9 to the one appointed PC per district. He further testified “The Precinct Committeemen are  
10 the backbone of our party.”<sup>4</sup>

11 34. Thus, by passing HB 2839, the legislature converted over seven thousand elected  
12 positions to a handful of appointed ones. By mistake.

13 35. Unfortunately, since HB 2839 was passed with an emergency clause, a super-  
14 majority of the legislature is required to undo it in time for the fix to be effective. As  
15 Democrats have realized since HB 2839 was passed, though the bill disenfranchises all  
16 voters, it has disproportionately negative effects on the Republican Party owing to its  
17 greater reliance on grass-roots activism. Thus, sufficient democratic votes for a fix have  
18 not been forthcoming.

19 36. Precinct Committeepersons play an important role in Arizona’s politics which  
20 makes it highly inappropriate for the position to be appointed. For example, they are  
21 responsible for nominating candidates for state legislature in the event of a vacancy. ARS  
22 41-1202. A person must also be an elected PC to serve as a State Committeeman or as any  
23 statutory officer of the Arizona Republican Party, including chairman of the Arizona  
24 Republican Party as well as to be elected as one of the Arizona Republican Party’s

25 \_\_\_\_\_  
26 <sup>2</sup> <https://www.azmirror.com/2022/03/07/after-mistakenly-scrapping-party-official-elections-in-2022-gop-lawmakers-scramble-to-undo-it/> (emphasis supplied).

27 <sup>3</sup> <https://www.azcentral.com/story/opinion/op-ed/laurieroberts/2022/03/08/embarrassment-arizona-legislature-strikes-again/9427709002/>

28 <sup>4</sup> Testimony of the Speaker of the Arizona House to the Government and Elections Committee given on March 8, 2022, minutes 36:30-48:20; (<https://www.azleg.gov/videooplayer/?eventID=2022031052>)(last accessed March 13, 2022).

1 representatives to the RNC. And a person must be an elected PC to serve on the Yavapai  
2 County Republican Committee.

3 37. “[I]n order to fully implement the constitutional right to vote, the vote of all citizens  
4 should have approximately equal weight.” *Tucson v. Royal*, 20 Ariz. App. 83, 87, 510 P.2d  
5 394, 398 (1973). “It is without cavil that the right to vote is a constitutionally protected  
6 right and legislative interference with this right is not justified by merely showing a  
7 substantial state interest. Laws which impair the right to vote are unconstitutional unless  
8 the governmental body can demonstrate that the laws are necessary to promote a  
9 compelling governmental interest.” *Id.* at 87. As a corollary, “it must be said that there is  
10 also a right not to vote.” *Beare v. Smith*, 321 F. Supp. 1100, 1103 (S.D. Tex. 1971).

11 38. Thus, giving the Yavapai County Republican Committee the sole authority to select  
12 Yavapai County’s PCs vests it with authority that the Committee neither wants, needs, nor  
13 considers to be legitimate or democratic. Yet the Yavapai County Republican Committee  
14 has been compelled by this legislative mistake to play the role of kingmaker despite its  
15 wishes and contrary to the provisions of the Arizona Constitution.

16 39. In crushing the democratic rights of electors to vote for party precinct  
17 committeepersons, and destroying the rights of candidates to run for election to these  
18 positions, HB 2839 violates several Arizona constitutional provisions as is shown below.

## 19 CAUSES OF ACTION

### 20 *First Cause of Action*

#### 21 Violation of Single Subject/Single Title Rule

22 40. Plaintiffs incorporate the preceding paragraphs by reference.

23 41. Article 4, part 2, section 13 of the Arizona Constitution places two important  
24 limitations on laws passed the Legislature: (1) the laws can cover only one subject (the  
25 “Single Subject Rule”), and (2) their contents must be properly noticed in the title of the  
26 bill (the “Fair Notice of Contents by Title Rule”). Ariz. Const. art. 4, pt. 2, § 13.

27 42. The title requirement in section 13 “was designed to enable legislators and  
28 the public upon reading the title to know what to expect in the body of the act **so that no**



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1 **one would be surprised** as to the subjects dealt with by the act.” *State v. Sutton*, 115 Ariz.  
2 417, 419 (1977) (quotation omitted, emphasis supplied).

3 43. The title of HB 2839 was “AN ACT AMENDING SECTION 16-322,  
4 ARIZONA REVISED STATUTES; AMENDING LAWS 2021, CHAPTER 155,  
5 SECTION 2; RELATING TO CANDIDATES FOR PUBLIC OFFICE.”

6 44. This title was not adequate to put members of the legislature on notice that  
7 the bill would be converting hundreds of elected positions to appointed ones, thus  
8 disenfranchising millions of Arizona voters by mistake and violating the Arizona  
9 Constitution.

10 45. Further, the title of the act claims that it amended certain statutes “relating to  
11 candidates for public office”. This is a very different thing then eliminating public offices  
12 entirely. Again, the Arizona Constitution was violated.

13 ***Second Cause of Action***

14 **Unconstitutional Special Law**

15 46. Plaintiffs incorporate the preceding paragraphs by reference.

16 47. Article 4, part 2, section 19 of the Arizona Constitution prohibits the  
17 legislature from enacting local or special laws regarding the “conduct of elections” or  
18 “[w]hen a general law can be made applicable.” (the “No Special or Local Law Clause”).  
19 Ariz. Const. art. 4, pt. 2, § 19 (11, 20).

20 48. The test for whether a law violates the No Special or Local Law Clause is  
21 threefold: (1) whether the classification is rationally related to a legitimate legislative  
22 purpose; (2) whether the classification is sufficiently general to encompass all members  
23 similarly situated; **and** (3) whether the classification is sufficiently elastic to accommodate  
24 warranted inclusions and exclusions as circumstances change. *Arizona Ctr. for Law in the*  
25 *Pub. Interest v. Hassell*, 172 Ariz. 356 (App. 1991); *Tucson Elec. Power Co. v. Apache*  
26 *County*, 185 Ariz. 5 (App. 1995).

27  
28

1           49.       Further, a statute is unconstitutional as a special or local law if it is worded  
2 such that its scope is limited to a particular case and it looks to no broader application in  
3 the future. *Republic Inv. Fund I v. Surprise*, 166 Ariz. 143 (1990).

4           50.       HB 2839, by its language, is limited in scope to the particular case of the  
5 upcoming 2022 statewide election and will no longer apply once the election is completed.

6           51.       HB 2839 discriminates against elected party precinct committeepersons  
7 apart from all other candidates for federal, state, and local offices whose rights to run for  
8 election (and the rights of the electorate to vote for them) are not altered.

9           52.       HB 2839’s classification abolishing the elective rights of precinct  
10 committeepersons for only one election cycle in 2022 is not rationally related to a  
11 legitimate legislative purpose.

12           53.       The rest of HB 2839 has a perhaps sensible means of standardizing signature  
13 requirements for federal and state candidates to get on the ballot for election that appears  
14 rationally related to the legitimate state purpose of uniformity across all fifteen Arizona  
15 counties so that the burdens of getting on the ballot are in rough parity across the State.

16           54.       However, HB 2839 has a nonsensible means of abolishing entirely all  
17 elections for party precinct committeepersons which has nothing to do with uniformity of  
18 burdens for candidates to get on the ballots in their respective counties for election contests.

19           55.       The classification is not sufficiently general to encompass all members  
20 similarly situated because it only applies to persons seeking to run for election as party  
21 precinct committeepersons and the electors desiring to vote for them, but excludes all other  
22 candidates for elective office in federal and state elections and electors desiring to vote for  
23 them.

24           56.       The classification is not sufficiently elastic to accommodate warranted  
25 inclusions and exclusions as circumstances change because the classification has no  
26 elasticity at all because it abolishes entirely one class of elections from taking place—but  
27 only for one year.

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1 57. For the reasons above, HB 2839 is a grotesque example of an  
2 unconstitutional special law that offends the letter and spirit of Arizona’s Constitution.

3 ***Third Cause of Action***

4 **Improper Use of Emergency Clause**

5 58. Plaintiffs incorporate the preceding paragraphs by reference.

6 59. Article 4, part 2, section 12 of the Arizona Constitution provides that “no act  
7 passed by the legislature shall be operative for ninety days after the close of the session of  
8 the legislature enacting such measure, except such as require earlier operation to preserve  
9 the public peace, health, or safety, or to provide appropriations for the support and  
10 maintenance of the departments of the state and of state institutions.”.

11 60. Sec. 4 of HB 2839 has no application to the public peace, health, or safety.

12 61. In addition, words have meanings that have limits. They say one thing and  
13 exclude another.

14 62. An “emergency” means the “[c]onfrontation by sudden peril. A pressing  
15 necessity; an exigency; an event or occasional combination of circumstances calling for  
16 immediate action or remedy. An unforeseen occurrence or condition calling for immediate  
17 action to avert imminent danger to life, health, or property.” *Emergency*, Ballentine’s Law  
18 Dictionary (3rd ed. 2010) (citations omitted).

19 63. Sec. 4 of HB 2839 was not a response to a bona fide emergency, that is, a  
20 “confrontation by sudden peril,” nor was there an unforeseen occurrence or condition  
21 calling for immediate action to avert imminent anger to life, health, or property.”

22 64. “Emergency measures” mean “[a]cts performed in an emergency.  
23 Legislation enacted in an emergency; laws necessary for the immediate preservation of the  
24 public peace, health, or safety....” *Emergency Measures*, Ballentine’s Law Dictionary (3rd  
25 ed. 2010) (citations omitted).

26 65. Again, Sec. 4 of HB 2839 was not necessary for the immediate preservation  
27 of the public peace, health, or safety.  
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66. Thus, the use of an emergency clause to enact Sec. 4 of HB 2839 was unconstitutional.

*Fourth Cause of Action*

**Violation of Art. 2 Sec. 2 of the Arizona Constitution**

67. Plaintiffs incorporate the preceding paragraphs by reference.

68. Article 2 of the Arizona Constitution provides that “All political power is inherent in the people.”

69. Prior to HB 2839, Legislative vacancies were filled by elected PCs from a candidate’s district.

70. However, now that HB 2839 has been enacted, an appointee to fill a legislative vacancy may themselves be appointed by unelected officials.

71. For this and the other reasons outlined herein, HB 2839 Sec. 4 violates Art. 2 Sec. 2 of the Arizona Constitution.

*Fifth Cause of Action*

**Violation of Art. 2 Sec. 5-6 of the Arizona Constitution and the First Amendment to the US Constitution (as incorporated against the states)**

72. Plaintiffs incorporate the preceding paragraphs by reference.

73. Article 2, 5-6 of the Arizona Constitution and the First Amendment to the US Constitution protect the freedom of speech and association.

74. Under these constitutional provisions, a political party has a right to choose its own candidate selection process for party officials.

75. Though this right is not without limitation, if it encompasses anything it encompasses not having the right to elect PCs entirely striped away from the party’s members.

76. Recognizing the importance of the people speaking as to who their PCs will be, the AZGOP’s Bylaws provide that only elected PCs are eligible to hold seats on the Party’s State Committee and therefore to govern the AZGOP and vote on, or serve as, the Party’s executive officers. Similarly, the Yavapai County Republican Committee’s bylaws

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1 provide that “All officers elected to the County Committee at the Statutory/Organizational  
2 Meeting shall be elected PCs” and explain that one of the organization’s purposes is to  
3 “[t]rain precinct committeeman and volunteers to grow the party, register voters and achieve  
4 maximum election turnouts for Republican candidates.”

5 77. Further, seats on the State Committee are allocated to Counties based on their  
6 number of elected PCs.

7 78. The Yavapai County Republican Committee’s bylaws require it to be made  
8 up entirely of elected PCs.

9 79. Further, perhaps owing to its conservative nature, Yavapai County has higher  
10 per-capita number of elected PCs than most counties in Arizona and Yavapai County has  
11 a significant number of precincts with competitive PC elections. Indeed, all or almost all  
12 PCs in Yavapai County are elected.

13 80. Thus Sec. 4 of HB 2839 will reduce the Yavapai County Republican  
14 Committee and its members’ overall influence on the governance of the AZGOP.

15 *Sixth Cause of Action*

16 **Declaration of Legislative Intent**

17 81. Plaintiffs incorporate the preceding paragraphs by reference.

18 82. In the alternative, it was neither the intent of the legislature to reduce all PC  
19 positions to appointed positions nor to reduce the number of PCs. Rather, the legislature’s  
20 intent, if any, was to provide a means to ensure that each precinct had at least one PC by  
21 providing a simple manner by which that one PC could be appointed. Plaintiffs ask this  
22 Court to declare the same.

23  
24 WHEREFORE Plaintiffs pray:

- 25 A. That this Court declare that Section 4 of HB 2839 is unconstitutional, that the use  
26 of an emergency clause was unconstitutional as to Section 4 of HB 2839, and  
27 grant preliminary and permanent injunctive relief regarding the same;  
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- B. Alternatively, for this Court to declare that the legislature’s intent was not for HB 2839 to limit the number of PCs nor to require more than one PC per precinct to be appointed instead of elected and grant preliminary and permanent injunctive relief regarding the same;
- C. For an order awarding Plaintiffs their attorney fees and costs under the private attorney general doctrine, A.R.S 12-2030, 341, 348, and any other applicable statute or equitable doctrine.
- D. For such other relief as this Court deems just and fair.

Respectfully submitted this 14th day of March 2022

By /s/Alexander Kolodin

Alexander Kolodin  
Arno Naeckel  
Roger Strassburg  
Veronica Lucero

**Davillier Law Group, LLC**  
4105 North 20<sup>th</sup> Street Ste. 110  
Phoenix, AZ 85016

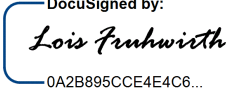
*Attorneys for Plaintiffs*

Rule 80 Verification

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I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Printed Name: Lois Fruhwirth

Signed Name: 0A2B895CCE4E4C6...

Title: County Chairman, Yavapai County Republican Committee

Date: 3/14/2022

**Davillier Law Group, LLC**  
4105 North 20th Street Suite 110  
Phoenix, Arizona 85016  
Telephone: (602) 730-2985 / Facsimile: (602) 801-2539