**No. 24A407**

# In the Supreme Court of the United States

SUSAN BEALS, IN HER OFFICIAL CAPACITY AS VIRGINIA COMMISSIONER OF ELECTIONS, ET AL.,

*Applicants*,

*v.*

VIRGINIA COALITION FOR IMMIGRANT RIGHTS, ET AL.,

*Respondents.*

*ON EMERGENCY APPLICATION FOR STAY PENDING APPEAL FROM THE U.S. COURT OF APPEALS FOR THE FOURTH CIRCUIT*

## BRIEF FOR RESTORING INTEGRITY AND TRUST IN ELECTIONS, INC. AS *AMICUS CURIAE* IN SUPPORT OF APPLICANTS

CHRISTOPHER E. MILLS
*Counsel of Record*
Spero Law LLC
557 East Bay Street #22251
Charleston, SC 29413
(843) 606-0640
cmills@spero.law

Counsel for *Amicus Curiae*

## TABLE OF CONTENTS

## TABLE OF AUTHORITIES

**CASES**



**STATUTES**



**OTHER AUTHORITIES**

## INTEREST OF *AMICUS CURIAE*

Restoring Integrity and Trust in Elections, Inc. is a 501(c)(4) non-profit organization with the mission of protecting the rule of law in the qualifications for, process and administration of, and tabulation of voting throughout the United States. RITE has a particular interest in ensuring that courts do not legislate election rules from the bench—especially right before an election. RITE supports laws and policies that promote secure elections and enhance voter confidence in the electoral process. Its expertise and national perspective on voting rights, election law, and election administration will assist the Court in reaching a decision consistent with the Constitution and the rule of law.*

## SUMMARY OF THE ARGUMENT

This case involves a last-minute injunction that prohibits Virginia from removing from its voter rolls over 1,600 individuals who either have declared they are noncitizens or were confirmed by the federal government to be noncitizens. The courts below based this extraordinary injunction on the National Voter Registration Act, despite the NVRA's overarching purpose to "enhance[] the participation of eligible citizens as voters." 52 U.S.C. § 20501(b)(2). This brief makes two points in support of the Applicants' request for a stay of the injunction.

First, neither the courts below nor the Respondents articulated a coherent statutory reading. Under the reading proposed and adopted below, the NVRA would

* In accordance with Rule 37.6, no counsel for a party authored this brief in whole or in part, and no person or entity, other than *amicus curiae*, its members, or its counsel, made a monetary contribution to its preparation or submission.

prohibit removal of noncitizens not just on a systematic basis in the 90 days before an election, but *always* and on *any* basis. If the Respondents are correct that the NVRA's listed categories for removal—voluntary request, death, conviction, incapacity, and residency change—prohibit removals based on citizenship, then states would be prohibited from ever removing individuals who could not have properly registered to vote in the first place, including noncitizens, minors, and fictitious persons. This outcome is both absurd and unconstitutional. Yet the Respondents below could not explain how their reading would not lead to this outcome, and the courts below did not even try. This failure to provide a coherent statutory reading is disqualifying, making the Applicants likely to succeed.

Second, letting the injunction remain in effect would impose irreparable harm on Virginia's citizens. An illegal vote cancels out a lawful vote. And the effect of the injunction will be to encourage voting by over a thousand individuals who have declared themselves or been found by the United States to be noncitizens. Once their votes are tabulated, proper voters would have no recourse for the unlawful dilution of their votes. This harm swamps any alleged problem from supposedly incorrect removals of individuals from Virginia's voter rolls, given that any individual can simply register on Election Day and cast a provisional ballot. Voting by citizens is the core mechanism to protect our self-government, and the injunction below threatens that mechanism. This Court should grant a stay.

## ARGUMENT

### I. The statutory reading endorsed below would prevent states from ever removing noncitizens, minors, and fictitious persons from voting rolls.

#### A. The NVRA does not require states to permanently maintain noncitizens and others not qualified to vote on voting rolls.

Perhaps the most obvious deficiency of the Respondents' statutory argument is that they cannot explain how, under their reading, the NVRA *ever* allows states to remove noncitizens, minors, or others not qualified to vote from voter rolls. Under this Court's "established canon[s] of construction," "similar language contained within the same section of a statute must be accorded a consistent meaning." *Nat'l Credit Union Admin.* v. *First Nat. Bank & Tr. Co.*, 522 U.S. 479, 501 (1998). "It is a fundamental canon of statutory construction that the words of a statute must be read in their context and with a view to their place in the overall statutory scheme," and courts interpret statutes to provide "a symmetrical and coherent regulatory scheme." *FDA* v. *Brown & Williamson Tobacco Corp.*, 529 U.S. 120, 133 (2000) (cleaned up).

Here, Respondents err in trying to divorce the "program" prohibited in the 90-day period before an election from the "general program" that the statute obligates states to run—and that provides the only permissible mechanism to remove voters, apart from the person's own request, criminal conviction, or mental incapacity. The *reason* Respondents try to avoid the statutory context is apparent: applied across the statute, their reading would mean that the NVRA prohibits states from removing a wide swath of individuals who cannot legally vote from the voter rolls, including noncitizens, minors, and others—ever. But Respondent's artificial siloing of the 90-

day provision contradicts basic statutory interpretation principles—and renders Respondents' interpretation absurd (and unconstitutional).

Subsection (a) of 52 U.S.C. § 20507 is titled "In General." Subsection (a)(3) of the statute requires states to "provide that the name of a registrant may not be removed from the official list of eligible voters except—(A) at the request of the registrant; (B) as provided by State law, by reason of criminal conviction or mental incapacity; or (C) as provided under paragraph (4)." 52 U.S.C. § 20507(a)(3). Paragraph (4), in turn, requires states to "conduct a general program that makes a reasonable effort to remove the names of ineligible voters from the official lists of eligible voters by reason of—(A) the death of the registrant; or (B) a change in the residence of the registrant, in accordance with subsections (b), (c), and (d)." *Id.* § 20507(a)(4).

Putting these subsections together, states cannot remove a "registrant" from a voter roll except at the registrant's request, for criminal conviction or mental incapacity, or via a "general program" that identifies individuals who have died or changed residences.

Subsection (c), meanwhile, is titled "Voter removal programs." It first describes how a state "may meet the requirement of subsection (a)(4) by establishing a program" with certain parameters. *Id.* § 20507(c)(1). Right from the start, then, the statute links the "program" discussed in subsection (c) with the "general program" discussed in subsection (a)(4). Subsection (c) goes on to require states to "complete, not later than 90 days prior to the date of a primary or general election for Federal office, any program the purpose of which is to systematically remove the names of

ineligible voters from the official lists of eligible voters." *Id.* § 20507(c)(1)(A). This provision, however, "shall be not construed to preclude" "the removal of names from official lists of voters on a basis described in paragraph (3)(A) or (B) or (4)(A) of subsection (a)"—which were at the registrant's request, criminal conviction, mental incapacity, and death. *Id.* § 20507(c)(1). Only one basis for removal from subsection (a) remains to be prohibited during the 90-day period: "a change in the residence of the registrant," which is covered by subsection (d).

Nothing in in these provisions speaks to noncitizens—or others whose registrations were void *ab initio*, such as minors, fictitious persons, or individuals who misrepresent their residence. So if Respondents are right that the 90-day limitation on programs prohibits removal on these bases—on *expressio unius* because the statute has listed exceptions—states could *never* remove individuals falling within these categories, no matter when the removal happens or whether it is after a systematic inquiry. On Respondents' reading, the NVRA would "prohibit a state from ever removing from its voting list a noncitizen"—or a minor or fictitious person—"even though the [person] should never have been registered in the first place." *United States* v. *Florida*, 870 F. Supp. 2d 1346, 1349 (N.D. Fla. 2012).

Thus, as Judge Hinkle has explained, the "conclusion is inescapable": subsection (a)(3)'s "prohibition on removing a registrant except on specific grounds simply does not apply to an improperly registered noncitizen" (or minor, etc.). *Id.* at 1349–50. And if subsection (a)(3) "does not prohibit a state from removing an improperly registered noncitizen, then [subsection (c)(2)] does not prohibit a state from systematically

removing improperly registered noncitizens during the quiet period." *Id.* at 1350. "[N]ot only does paragraph (c)(2) incorporate by reference paragraphs (a)(3) and (a)(4) in setting forth those removals excepted from the 90–day period, but the language of each of the two provisions tracks the other," making these provisions "inextricably linked." *Arcia* v. *Detzner*, 908 F. Supp. 2d 1276, 1282–83 (S.D. Fla. 2012), *rev'd and remanded sub nom. Arcia* v. *Fla. Sec'y of State*, 772 F.3d 1335 (11th Cir. 2014); *see Arcia*, 772 F.3d at 1348 (Suhrheinrich, J., dissenting) (agreeing with this reasoning).

Respondents' reading, by contrast, "produce[s] an absurd result": "a state could therefore not remove from its voting rolls minors, fictitious individuals, individuals who misrepresent their residence in the state, and non-citizens." *Arcia*, 908 F. Supp. 2d at 1282. No party or court below appeared to dispute that result would be absurd.

An example helps illustrate the point. Say a fluke within a state's internal motor vehicle-voter processes leads it to add 16-year-olds onto the voter rolls. Under the Respondents' reading, the state could not simply reverse the automatic addition of minors not qualified to vote to the voter rolls within 90 days of an election. That result is odd (and constitutionally problematic) enough. Odder still would be that the Respondents' reading would prohibit the state from *ever* removing these minors from the voter rolls.

Not only would these results of the Respondents' reading be absurd, they are also inconsistent with Congress's statutory intent. See *Pub. Citizen* v. *U.S. Dep't of Just.*, 491 U.S. 440, 471 (1989) (Kennedy, J., concurring in judgment) (noting the proper application of the absurdity canon where "it is quite impossible that Congress could

have intended the result, and where the alleged absurdity is so clear as to be obvious to most anyone" (citation omitted)). The NVRA's first statutory finding is that "the right of *citizens* of the United States to vote is a fundamental right." 52 U.S.C. § 20501(a)(1) (emphasis added). And its four statutory purposes are:

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

*Id.* § 20501(b). Prohibiting states from removing self-identified noncitizens, minors, and fictitious persons from voter rolls would be an exceedingly strange way of effectuating these purposes.

The statutory language reinforces this conclusion. The listed exceptions—death, incapacity, conviction, and a change in residence—"indicate[] that what Congress had in mind when it drafted these sections was removing a person on grounds that typically arise after an initial proper registration." *Florida*, 870 F. Supp. 2d at 1350. "During the 90-day quiet period, a state may pursue a program to systematically remove registrants on request or based on a criminal conviction, mental incapacity, or death, but not based on a change of residence." *Ibid.* But "Congress was not addressing the revocation of an improperly granted registration of a noncitizen." *Ibid.* Unlike residency changes, citizens become noncitizens only very rarely: the year the

NVRA was enacted, about 697 citizens (out of about 260 million) renounced their citizenship.[1] That's about .000268% of U.S. citizens. Likewise, persons of age do not become minors, and real persons do not become fictitious. So it is much more reasonable to think that Congress's limitations in the NVRA were geared toward the listed categories, which can and often do change, rather than categories that could make a registration void *ab initio* like age and citizenship. Thus, the statutory limitations should not be read to "appl[y] to removing noncitizens who were not properly registered in the first place." *Florida*, 870 F. Supp. 2d at 1350.

Interpreting the NVRA otherwise would raise serious constitutional doubts about its validity: "the Elections Clause empowers Congress to regulate *how* federal elections are held, but not *who* may vote in them." *Arizona* v. *Inter Tribal Council of Arizona, Inc.*, 570 U.S. 1, 16 (2013). Given that the Respondents' reading would "preclude[]" states from enforcing their voting qualifications, the Applicants' "plausible" reading of the NVRA should control. *Id.* at 17–18.

In sum, "interpretation always depends on context," "context always includes evident purpose," and "evident purpose always includes effectiveness." A. Scalia & B. Garner, *Reading Law: The Interpretation of Legal Texts* 63 (2012). Interpretation should thus "further[], not hinder[]" the text's "manifest purpose." *Ibid.* Here, the NVRA's context, statutory whole, and purpose support the Applicants' reading—and strongly oppose the Respondents' reading.

[1] Joint Comm. on Taxation, *Issues Presented by Proposals to Modify the Tax Treatment of Expatriation* 7 (June 1, 1995), https://perma.cc/W5WP-Z9JM.

### B. Neither Respondents nor the courts below offered a coherent statutory reading.

Below, Respondents had no answer to the problem that their reading forecloses states from *ever* removing noncitizens, minors, fictitious persons, or others from voting rolls. In a footnote, the United States noted that "Section 8(a)(3) refers to 'registrant[s]' while the Quiet Period Provision refers to 'ineligible voters.'" D. Ct. Dkt. 100, at 2 n.1. The United States did not explain how this addresses the statutory problem, and no explanation is apparent. "Surely 'removed' in [subsection (a)(3)] and 'remove' in [subsection (c)(2)] mean the same thing," and "there is no reason to believe the reference to removing a 'registrant' in [subsection (a)(3)] means something different than removing 'ineligible voters' in [subsection (c)(2)]." *Florida*, 870 F. Supp. 2d at 1350. "[B]y definition, someone who is being 'removed' has already registered, so an 'ineligible voter' is a 'registrant.'" *Ibid.* Contrary to the Fourth Circuit's unelaborated assertion that these "different words" could not have "the same meaning," App. 3, there is no "canon of interpretation that forbids interpreting different words used in different parts of the same statute to mean roughly the same thing." *Kirtsaeng* v. *John Wiley & Sons, Inc.*, 568 U.S. 519, 540 (2013).

Relying on an Eleventh Circuit decision, the United States also insisted that "nothing in the NVRA bars a state from investigating 'potential non-citizens and removing them on the basis of individualized information, even within the 90-day window.'" CA4 Dkt. 20, at 16 (quoting *Arcia*, 772 F.3d at 1348). But this is a conclusion without an interpretive explanation. And the United States' reliance on the Eleventh Circuit as cover for its non-argument is misplaced, given that the court

declined to "decide today whether" "the General Removal Provision . . . allow[s] for removals of non-citizens." 772 F.3d at 1346. The Fourth Circuit similarly skated by this problem, declaring that this "differently worded statutory provision . . . is not at issue here," so it "le[ft] questions about [it] for another day." App. 3.

This refusal by the lower courts to agree with the United States' distinction of the general removal provision is damning. If these courts thought that an argument like the United States' had any merit, they could have simply rejected on that basis the absurd outcome otherwise associated with the United States' reading. Instead, both the Fourth and Eleventh Circuits declined to address the issue. Then both simply asserted in conclusions—now parroted by the United States—that states can conduct individual investigations of "potential non-citizens and remov[e] them on th[at] basis." *Arcia*, 772 F.3d at 1348; see App. 5. But if the statute categorically prohibits states from removing noncitizens, minors, and fictitious individuals—ever—then whether the investigation is individualized or systematic is irrelevant.

The United States has no answer for how its reading does not result in this categorical prohibition. And though the Fourth Circuit found it acceptable to disregard this fundamental problem—ignoring that not only are subsections (a) and (c) in the same provision, but also that they cross-reference each other—this Court's precedents require courts to read a statute to fit "all parts into an harmonious whole." *Brown & Williamson*, 529 U.S. at 133. "Whatever the virtues of judicial minimalism, it cannot justify judicial incoherence." *Nat'l Aeronautics & Space Admin.* v. *Nelson*,

562 U.S. 134, 166 (2011) (Scalia, J., concurring in judgment). The United States provides no coherent explanation of the statute's meaning.

Neither have the private Plaintiffs. Their response below was to point out that the 90-day provision "covers 'any' program, not the 'general program' described in subsection (a)." D. Ct. Dkt. 103, at 8. But that does nothing to solve the problem with their reading. "General" would only further limit the type of program under which states could remove individuals before the 90-day period, without changing the categories for which removal is permissible. Plus, the better reading is that subsection (c)'s "program" refers to a type of "general program" in subsection (a), so the deficiency of the Respondents' reading still infects both provisions.

* * *

"What the rule of absurdity seeks to do is what all rules of interpretation seek to do: *make sense* of the text." Scalia & Garner, *supra*, at 235. And what matters is "the text of the whole statute." *Maracich* v. *Spears*, 570 U.S. 48, 65 (2013). Respondents cannot articulate a statutory interpretation of the 90-day provision that makes for a sensible, coherent regime. Applicants are thus likely to succeed on the merits.

**II. Virginia's citizens face irreparable harms from the injunction.**

Failing to stay the injunction below would cause irreparable harm to the state's interest in protecting election integrity, in several respects.

First, as discussed, the courts below refused to come up with a reasoned explanation for how their reading does not categorically prohibit states from removing non-citizens, minors, or fictitious persons from voting rolls—*and* refused to

adopt the United States' or the private Plaintiffs' unsound explanations. That makes it difficult to credit their irreparable harm analysis. In particular, the Fourth Circuit declared the Applicants' harm "weak" because they "remain able to prevent noncitizens from voting by canceling registrations on an individualized basis." App. 5. Putting aside that the Fourth Circuit did not say what this means—after all, Virginia's action here was based on each individual declaring or providing documents showing non-citizenship—that conclusion is just what the Fourth Circuit refused to endorse or explain in its statutory interpretation analysis.

"[C]ourts purport to be engaged in *reasoned* decisionmaking," and since the Fourth Circuit could provide "no intellectual justification" for concluding that, under its interpretation, states can still remove non-citizens, how could it tell Virginia to do what logic and reason show is *impermissible* under its own interpretation? *Hein* v. *Freedom From Religion Found., Inc.*, 551 U.S. 587, 628 (2007) (Scalia, J., concurring in judgment). In other words, that Virginia could do something that the Fourth Circuit's reasoning would say is also unlawful—potentially incurring more liability on "another day" (App. 4)[2]—does not alleviate the state's irreparable harm from being unable to apply its longstanding law.

That irreparable harm is significant. Most obviously, irreparable harm always exists when a noncitizen (or minor or other person not qualified to vote) votes. Each illegal vote cancels out a proper one—and could even provide the margin of victory

[2] In this respect, note the private Plaintiffs' coy statement that "[n]o party has argued that Virginia" is "prohibited from removing noncitizens from registration rolls." D. Ct. Dkt. 103, at 8. Apparently, they are leaving open the possibility that someday a party—perhaps they themselves—will make that argument.

for a candidate who would not otherwise have been elected. And the illegal vote cannot be remedied once it is cast and tabulated, so the Fourth Circuit's promise that Virigina can prosecute non-citizen voters is quiet comfort for every eligible voter relying on *this election* to produce a result that reflects the will of the people. Yet the injunction below encourages well over a thousand individuals, all of whom have declared that they are noncitizens (and did not change that on repeated inquiry) or were verified by the federal government to be noncitizens, to cast an illegal ballot. The certain harm that this will cause lawful voters—diluting and cancelling out their votes—cannot be remedied. As this Court has said, "[t]he right of suffrage can be denied by a debasement or dilution of the weight of a citizen's vote just as effectively as by wholly prohibiting the free exercise of the franchise." *Purcell* v. *Gonzalez*, 549 U.S. 1, 4 (2006) (quoting *Reynolds* v. *Sims*, 377 U.S. 533, 555 (1964)). "To the extent that a citizen's right to vote is debased, he is that much less a citizen." *Reynolds*, 377 U.S. at 567. The NVRA's purposes—centered around "enhanc[ing] the participation of eligible voters" and "protect[ing] the integrity of the electoral process"—confirm the significance of the harms from the injunction here. 52 U.S.C. § 20501(b); see also *Burson* v. *Freeman*, 504 U.S. 191, 199 (1992) ("[A] State has a compelling interest in ensuring that an individual's right to vote is not undermined by fraud in the election process.").

Further, there is a very low likelihood of a person incorrectly declaring himself to be a noncitizen and failing to correct that after multiple inquiries. There is also a low likelihood of the federal government's own database wrongly labeling citizens as

noncitizens.[3] Thus, the harms from the injunction far outweigh any hypothetical harms from Virginia continuing its policy enforcement. What's more, any hypothetical *citizen* removed from the rolls can easily remedy any harm Virginia's conduct has inflicted by registering to vote on Election Day, at which time they need do nothing more than attest to their citizenship under oath. See Va. Code Ann. § 24.2-420.1; see also *Crawford* v. *Marion Cnty. Election Bd.*, 553 U.S. 181, 197–98 (2008) (opinion of Stevens, J.) (noting that "the availability of the right to cast a provisional ballot provides an adequate remedy"). So on the one hand, there is no harm to any particular citizen, and on the other, there is grave harm to the remainder of the citizenry should *any* non-citizen cast a ballot that is tabulated in the election. As between two different "error costs," those that arise from the risk of noncitizens voting easily swamp those that arise from Virginia's potential errors in identifying noncitizens.

Allowing the injunction to continue would also harm public confidence in the election—further discouraging lawful voters. At a time when confidence in our elections has ebbed precipitously, the Fourth Circuit has, on the eve of a consequential presidential election, ordered Virginia to expose its elections to more than 1,600 people who have told the state they are not citizens of this country. And it has done this even though there is no obstacle to participation in the election by the very small percentage of those people whose statements to the state regarding their lack of citizenship were in error. The likely effect of such an order on public confidence

[3] The United States calculates the database's accuracy as over 99%. U.S. Gov't Accountability Off., *Immigration Status Verification for Benefits* 16 (Mar. 2017), https://perma.cc/3HF9-QR33.

is not difficult to discern. "Voters who fear their legitimate votes will be outweighed by fraudulent ones will feel disenfranchised," "driv[ing] honest citizens out of the democratic process and breed[ing] distrust of our government." *Purcell*, 549 U.S. at 4. "Confidence in the integrity of our electoral processes is essential to the functioning of our participatory democracy," *ibid.*, and a court order that undermines those processes also undermines democratic functioning.

Last and relatedly, noncitizen voting is not some technical violation. Doing so in a federal election is a federal crime. See 18 U.S.C. § 611. And Congress in the NVRA sought to protect "the right of citizens of the United States to vote" (52 U.S.C. § 20501(a)(1))—reinforcing that its concern about 1,600 noncitizens voting is surely greater than any concern about a handful of people having to cast a provisional ballot. Excluding noncitizens "from basic governmental processes is not a deficiency in the democratic system but a necessary consequence of the community's process of political self-definition." *Cabell* v. *Chavez-Salido*, 454 U.S. 432, 439 (1982). "States can prevent non-citizens from serving as probation officers, or teaching in public schools." *OPAWL—Bldg. AAPI Feminist Leadership* v. *Yost*, No. 24-3768, 2024 WL 4441458, at *5 (6th Cir. Oct. 8, 2024) (citations omitted). "Why? Because the 'distinction between citizens and aliens, though ordinarily irrelevant to private activity, is fundamental to the definition and government of a State.'" *Ibid.* (quoting *Ambach* v. *Norwick*, 441 U.S. 68, 75 (1979)).

"Self-government, whether direct or through representatives, begins by defining the scope of the community of the governed," and noncitizens "are by definition those

outside of this community." *Cabell*, 454 U.S. at 439–40. Citizens "belong[] to the polity and [are] entitled to participate in the processes of democratic decisionmaking," which is why this Court has repeatedly recognized "a State's historical power to exclude aliens from participation in its democratic political institutions' as part of the sovereign's obligation 'to preserve the basic conception of a political community.'" *Foley* v. *Connelie*, 435 U.S. 291, 295–96 (1978) (citation omitted) (quoting *Sugarman* v. *Dougall*, 413 U.S. 634, 647–48 (1973)). In short, "[i]t is fundamental to the definition of our national political community that foreign citizens do not have a constitutional right to participate in, and thus may be excluded from, activities of democratic self-government"—most of all, voting. *Bluman* v. *FEC*, 800 F. Supp. 2d 281, 288 (D.D.C. 2011), *aff'd*, 565 U.S. 1104 (2012).

This Court has warned that "[j]udicial incursions in this area may interfere with those aspects of democratic self-government that are most essential to it." *Cabell*, 454 U.S. at 440. By approving an injunction that is far more likely to enable or even encourage noncitizens to cast unlawful votes than it is to lead to any lawful votes, the courts below flouted this warning. The resulting threat not just to election integrity in terms of counting ballots but also to the integrity of our self-government requires this Court's intervention.

## CONCLUSION

For these reasons, the Court should grant a stay.

Respectfully submitted,

CHRISTOPHER E. MILLS
*Counsel of Record*
Spero Law LLC
557 East Bay Street #22251
Charleston, SC 29413
(843) 606-0640
cmills@spero.law

Counsel for *Amicus Curiae*

OCTOBER 28, 2024