No. 19-177

In the Supreme Court of the United States

UNITED STATES AGENCY FOR INTERNATIONAL DEVELOPMENT, ET AL.,

Petitioners,

v.

ALLIANCE FOR OPEN SOCIETY INTERNATIONAL, INC., ET AL.,

Respondents.

On Writ of Certiorari to the United States Court of Appeals for the Second Circuit

BRIEF OF ADVENTIST DEVELOPMENT AND RELIEF AGENCY INTERNATIONAL AS *AMICUS CURIAE* IN SUPPORT OF RESPONDENTS

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INTEREST OF THE *AMICUS CURIAE*

Adventist Development and Relief Agency International (ADRA) is the global humanitarian organization of the Seventh-day Adventist Church. Founded in 1956 as the Seventh-day Adventist Welfare Service and renamed ADRA in 1984, the agency has a long and successful history of providing humanitarian relief and implementing development initiatives. With a presence in 181 countries and 103 affiliates around the world, ADRA has a strong interest in ensuring that it can speak with one voice worldwide. ADRA's affiliates are administered in the countries where they are located, and are connected to their respective local branches of the Seventh-day Adventist Church.[1]

ADRA is unconditionally committed to serving all, regardless of beliefs, practices, or religion. As a Seventh-day Adventist institution, ADRA is firmly opposed to prostitution and sex trafficking. However, ADRA and its affiliates must remain free in their own policies and communications to express ADRA's beliefs and those of ADRA's sponsoring organization, the General Conference of Seventh-day Adventists. And, in the minds of church members, donors, and other stakeholders, a requirement that one of ADRA's affiliates endorse the Government's preferred message would be little different than a requirement imposed on ADRA itself. ADRA is deeply concerned that a rul-

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[1] The parties to this case have consented to the filing of this brief. *Amicus* affirms that no counsel for a party authored this brief in whole or in part and that no person other than *amicus* and its counsel made a monetary contribution to its preparation or submission. ADRA is a member of respondent InterAction.

ing for the Government in this case would in the future allow the Government to impose upon ADRA's affiliates, and thus effectively on ADRA itself, requirements to espouse policies with which ADRA does *not* agree.

INTRODUCTION AND SUMMARY OF ARGUMENT

I. Jesus told his followers to "make disciples of all nations," Matthew 28:19 (NIV), ministering to all mankind without concern for borders. Most churches and religious organizations—including ADRA and the General Conference of Seventh-day Adventists with which ADRA is affiliated—accordingly view their beliefs as fundamental and applicable wherever they operate. And this view of course applies to charitable work as well as to missionary work: "Love your neighbor as yourself," Matthew 22:39 (NIV), embraces people half a world away as much as next-door neighbors.

Part of any such project is maintaining integrity and broadcasting a consistent message everywhere that an organization seeks to minister. Forcing the foreign affiliate of a U.S. religious organization to affirm a belief that the organization does not actually hold undermines that integrity, and thus the rights of all branches of the organization. The Government's approach in this case would have the Court focus on corporate-law technicalities and disregard the real-world impacts on nonprofits' spiritual and humanitarian missions. This Court should reject the Government's unrealistic and unworkable position.

This Court already held, in *Agency for International Development* v. *Alliance for Open Society International, Inc.*, 570 U.S. 205 (2013) (*AOSI I*), that the

Policy Requirement in this case—which prohibits funding "any group or organization that does not have a policy explicitly opposing prostitution and sex trafficking" (22 U.S.C. 7631(f))—"violates the First Amendment and cannot be sustained" because it "compels as a condition of federal funding the affirmation of a belief that by its nature cannot be confined within the scope of the Government program." 570 U.S. at 221. Such a condition is "an unconstitutional burden on First Amendment rights": by requiring the recipient of federal funds earmarked for fighting disease to affirmatively adopt a policy that it opposes prostitution, the Policy Requirement impermissibly "seek[s] to leverage funding to regulate speech outside the contours of the program itself." *Id.* at 214-15.

In short, this Court held that by requiring funding recipients "to pledge allegiance to the Government's policy," the Policy Requirement runs afoul of a foundational First Amendment precept: "'If there is any fixed star in our constitutional constellation, it is that no official, high or petty, can prescribe what shall be orthodox in politics, nationalism, religion, or other matters of opinion or force citizens to confess by word or act their faith therein.'" 570 U.S. at 220-21 (quoting *W. Va. State Bd. of Educ.* v. *Barnette*, 319 U.S. 624, 642 (1943)).

In so holding, the Court rejected the suggestion that this unconstitutional burden could be "alleviate[d]" through the legal fiction of establishing separate corporate entities (one to accept the funds and adopt the anti-prostitution policy, and another to communicate views that diverge from the policy). 570 U.S. at 219. The key problem with relying on such corporate structure, in implementing a requirement "that a

funding recipient espouse a specific belief as its own," is that when an affiliated entity is "clearly identified with the recipient," the affiliate can dispute the Government's message "only at the price of evident hypocrisy"—the recipient and its clearly identified affiliate will be seen as stating contradictory beliefs. *Ibid.* The Government thus cannot enact a regime that effectively requires, as a condition of receiving funding, that the left hand contradict or disavow the right hand's stated beliefs.

This is especially true for religious organizations and their associated charitable arms. A core purpose of most religious organizations is to convey a set of moral and spiritual principles. Consistency in speech about those principles is crucial if a religious organization is to accomplish its mission. Fundamental American principles of religious liberty, freedom of conscience, and freedom of speech forbid the Government from telling religious organizations what beliefs they must espouse.

And this is true, as *AOSI I* established, even where the condition is attached to receipt of government funding (except in the narrow circumstance in which the required speech is integral to the purpose of the grant). Thus, while ADRA has no objection to the substance of the particular message compelled by the Policy Requirement in this case, it strenuously objects in principle to the notion that a religious organization might be compelled to espouse the Government's position on *any* topic: if the Government may require endorsement of the Policy Requirement here, then it may later compel adoption of other messages that would indeed be contrary to the ADRA's beliefs—

such as, for example, a message affirming support for same-sex marriage.

The Government's position in this follow-on case is that there is no First Amendment problem with compelling a U.S. nonprofit's foreign, separately incorporated affiliate to say something to which both the U.S. entity and the foreign affiliate object. That approach blinks reality. As the Second Circuit's opinion recognized, compelling a foreign affiliate to speak in such circumstances *also* burdens the speech of the related U.S. nonprofit—which is left to choose between remaining silent in the face of its affiliate's compelled speech (which will then likely be reasonably imputed by the public to the U.S. entity) or exposing itself as hypocritical by disavowing the idea that its affiliate has endorsed.

That is the very problem that this Court identified the last time this case was here. And the problem is not alleviated by drawing legalistic distinctions among different entities—neither the conscience nor the public's expectations of religious organizations like ADRA is affected by such invisible boundaries. Evident hypocrisy is not dispelled by pointing to a corporate charter, when everything about the organization of the affiliated entities presents them to the world as a unified, functionally integrated entity.

II. The Government also suggests that respondents and other nonprofits could avoid charges of hypocrisy by acting only through a U.S. entity whose rights are protected by this Court's decision in *AOSI I*. But that is not a solution. Many foreign nations prohibit U.S. NGOs from operating directly in their sovereign territory, so that entities like ADRA have no choice but to form foreign affiliates in order to conduct

operations in those countries. And the Government itself has increasingly directed or even restricted its grants to in-country organizations—effectively *requiring* nonprofits to establish local affiliates in order to receive U.S. aid, which can be indispensable to the ability to conduct effective humanitarian work abroad.

The Government's position amounts to requiring transnational nonprofits to endorse the Government's preferred policy as their own, or else to cease operating in many of the countries that most need aid. Such a condition on receipt of government funds is unconstitutional.

ARGUMENT

I. The First Amendment Rights Of International Religious Organizations Based In The United States Are Severely Burdened When Their Foreign Affiliates Are Compelled To Endorse The Government's Message.

The United States is home to many religiously affiliated organizations that do charitable and humanitarian work around the world. These include, for instance, ADRA,[2] the International Christian Concern,[3] and Cross International.[4] Many well-known charities have religious affiliations that are less obvious from

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[2] See generally Adventist Development and Relief Agency, https://adra.org/.

[3] See generally International Christian Concern, Persecution, https://www.persecution.org/.

[4] See generally Cross International, Impact, https://crossinternational.org/impact/.

their names: Habitat for Humanity (ecumenical Christian)[5] and Children of the Nations (evangelical Christian),[6] to take two examples. In addition, many global religious organizations headquartered elsewhere have substantial presences in the United States. And even national churches, such as the Russian Orthodox, Greek Orthodox, and Serbian Orthodox churches, are in fact transborder institutions, which minister to ethnic diasporas (as well as to converts) in the United States and throughout the world.

Such religious organizations, and presumably most conscience-based organizations more broadly, seek to adhere to Alexander Solzhenitsyn's famous principle: "Live not by lies"—*i.e.*, refuse to endorse in any way those beliefs that you hold to be false.[7] Each person, Solzhenitsyn argued, must resolve never to "write, sign or print in any way a single phrase which in his opinion distorts the truth," never to "take into hand nor raise into the air a poster or slogan which he does not completely accept," and never to "depict, foster or broadcast a single idea which he can see is false

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[5] See generally Habitat for Humanity, Frequently asked questions, https://www.habitat.org/about/faq#christian; Habitat for Humanity, Christian identity, https://www.habitat.org/ap/about/how-we-began/christian-identity.

[6] See generally Children of the Nations, Our Mission, https://cotni.org/about-cotn/our-mission.

[7] Alexander Solzhenitsyn, *Live Not by Lies*, WASH. POST, Feb. 18, 1974, at A26, *reprinted at* https://www.washingtonpost.com/wp-dyn/content/article/2008/08/04/AR2008080401822.html. The original Russian title might be more accurately rendered "To live not by the lie," but the phrase has entered English in the version given by the 1974 *Washington Post* translation.

or a distortion of the truth."[8] Many religious organizations believe that God imposed the same command on them. "The integrity of the upright guides them, but the unfaithful are destroyed by their duplicity." Proverbs 11:3 (NIV). Jesus himself specifically warned against hypocrisy. See Matthew 23:1-36 (NIV); Luke 11:37-52 (NIV).

The conscientious obligations of a religious organization are not limited either by international borders or by the technical niceties of corporate governance. A global church's Egyptian or Indian branches do not espouse fundamental beliefs that differ from those of its American branch. To the contrary, a church's religious beliefs bar *any* of its branches from expressing a view contrary to those beliefs.

So, for example, ADRA could not conscientiously allow its Tanzanian affiliate to affirm a hypothetical government policy supporting the moral equality of opposite-sex and same-sex marriage, even though the umbrella organization otherwise continued adhering to the contrary view.[9] And the converse presumably would be true of a church that takes the opposite position on the same-sex-marriage issue. Religious commitments are global; they do not change from country to country or from corporate affiliate to corporate affiliate.

The public at large, moreover, expects and even demands that religious organizations adhere to a consistent "live not by lies" philosophy across all of their

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[8] *Ibid.*

[9] As noted (page 1, *supra*), ADRA is committed to serving all regardless of the beneficiaries' beliefs. But as a matter of doctrine, ADRA itself cannot affirm same-sex marriage.

branches; religious organizations accordingly "tak[e] pains to do what is right, not only in the eyes of the Lord but also in the eyes of man," 2 Corinthians 8:21 (NIV). A religious organization that contradicts itself on matters of belief loses credibility and moral authority, regardless of whether the contradictory statements are made by legally distinct entities operating in different countries: As the Government has recognized in this case, "when two organizations are closely linked, * * * the speech of one can be seen as the speech of both." U.S. Ct. App. Reply 9, quoted in Pet. App. 10a.

Indeed, the Government has gone so far as to acknowledge that "one organization cannot credibly disavow the speech of another if the two are closely associated," such that "the use of affiliates is not an adequate means of cabining the constitutional effects of the policy requirement." *Ibid.* (so characterizing the holding of *AOSI I*). Speech by a foreign affiliate that is inconsistent with a church's overall message can readily give rise to confusion regarding the church's actual beliefs as well as a charge of "evident hypocrisy" against an entire global religious organization, and thereby against its U.S. branches as well. *AOSI I*, 570 U.S. at 219.

Given these mutually reinforcing needs to maintain internal integrity and to avoid doctrinal confusion and external charges of hypocrisy, global religious organizations are particularly threatened by the prospect of a precedent under which the Policy Requirement—and similar future requirements—can be enforced against their foreign affiliates. Enforcing the statute against a foreign affiliate would not only mean compelling that entity to speak the Government's

message; it would also put the church as a whole (and in particular its U.S. branches) in an untenable position. With the foreign affiliate having been compelled to take an affirmative position on the issue at hand, the U.S. entity must either stay silent and have the foreign entity's forcibly-adopted policy be seen (incorrectly) as representing the views of the organization as a whole[10]—or else it must affirmatively announce a different policy and thereby create confusion about the organization's true views on matters of doctrinal significance and put its credibility and moral authority at risk of a charge of hypocrisy. Either way, the U.S. organization would be "coerced into betraying [its] convictions." *Janus* v. *A.F.S.C.M.E., Council 31*, 138 S. Ct. 2448, 2464 (2018).

The latter option, moreover, may not be available at all in view of the Government's implementing regulations, which insist that "[a funding] recipient must have objective integrity and independence from any affiliated organization that engages in activities inconsistent with" the Government's message. 45 C.F.R. 89.3. The U.S. branch of a transnational organization that wishes to maintain clear identification with its affiliated entities is thus apparently *prohibited* from speaking in a way that contradicts its foreign affiliate's coerced adoption of the Government's line. Should the U.S. entity wish to try setting the record straight, it could apparently do so only by creating and maintaining wholly distinct domestic and foreign entities. But such an enforced "solution" to the problem posed by the Policy Requirement would raise its own serious First Amendment problems: it would still

[10] See Resp. Br. 37-42 (discussing cases concerning attribution of one entity's speech to another).

mean dictating what a U.S. organization may say (it would have to adopt "signs and other forms of identification that distinguish [it] from the affiliated [foreign] organization," *id.* 89.3(b)(5)), and would more generally burden the U.S. organization's freedom to associate with related foreign entities.

This problem is particularly severe with respect to religious organizations, which by their nature cannot simply be split up into "independent" entities. Religious organizations, moreover, are constitutionally entitled to "'independence from secular control or manipulation—in short, power to decide for themselves, free from state interference, *matters of church government* as well as those of faith and doctrine.'" *Hosanna-Tabor Evangelical Lutheran Church & Sch.* v. *E.E.O.C.*, 565 U.S. 171, 185-86 (2012) (emphasis added, quoting *Kedroff* v. *St. Nicholas Cathedral of Russian Orthodox Church in N. Am.*, 344 U.S. 94, 116 (1952), and discussing *Watson* v. *Jones*, 80 U.S. (13 Wall.) 679 (1872)).[11] Given the constitutional infirmities of a compelled-separation requirement, it is unsurprising that the Government does not rely on the

[11] Accord *Roman Catholic Archdiocese of San Juan, Puerto Rico* v. *Acevedo Feliciano*, No. 18-921, slip op. at 2 (U.S. Feb. 24, 2020) (Alito, J., concurring) (noting "difficult question[]" whether "the First Amendment permits civil authorities to question a religious body's own understanding of its structure and the relationship between associated entities"); *Serbian E. Orthodox Diocese for U.S.A. & Canada* v. *Milivojevich*, 426 U.S. 696, 710 (1976) (courts cannot resolve "church disputes over church polity and church administration"); *Presbyterian Church in the United States* v. *Mary Elizabeth Blue Hull Mem'l Presbyterian Church*, 393 U.S. 440, 447 (1969) ("the civil courts [have] no role in determining ecclesiastical questions").

"objective integrity and independence" regulation as a basis to defend the Policy Requirement.[12]

In short, by compelling the foreign entity to speak the Government's message, the Policy Requirement burdens the U.S. organization's own freedom of speech. The entity cannot remain neutral in the eyes of the public, and—should it wish to speak—it cannot effectively "live not by lies." As the Second Circuit put it, where "[foreign] affiliates are clearly identified with [U.S. organizations], * * * to require the [foreign] affiliates to abide by the Policy Requirement would require the closely related—and often indistinguishable—[domestic] plaintiffs to be seen as simultaneously asserting two conflicting messages." Pet. App. 9a.

The Government's reliance on principles of corporate law (Pet'r Br. 17, 28-31) is therefore misplaced. This case does not concern "liab[ility] for wrongful conduct" (*contra id.* at 28), but the likely attribution of one entity's compelled speech to its related U.S. entity and the resulting damage to the U.S. entity's ability to effectively convey its message. The burden on a U.S. church imposed by enforcement of the Policy Requirement against its foreign affiliates is not affected by the organization's formal corporate structure, because both the church's conscience and the public's perception treat the global organization as a single Church with an obligation to maintain doctrinal integrity. Compelled speech by a foreign affiliate burdens its domestic brethren by threatening that integrity.

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[12] The Government cites 45 C.F.R. 89.3 only once, in the course of its background discussion of the prior proceedings in this litigation. Pet'r Br. 10.

Thus, "[i]t is the First Amendment rights of the *domestic plaintiffs* that are violated" when the Policy Requirement is enforced against a foreign affiliate. Pet. App. 10a. And that is not because any right possessed by the foreign entity is transferred to its domestic brethren as through a veil-piercing doctrine,[13] but because in conditioning the foreign entity's receipt of funds on its adoption of the Government's point of view, the Policy Requirement imposes an unconstitutional burden *on the domestic entities*.[14]

Churches and other conscience-based organizations like ADRA must be able to maintain a consistent message worldwide, and requiring one arm of the organization to parrot the Government's point of view will inevitably hinder the organization's overall ability to convey its message—harming not only the foreign entity directly made to speak, but also its U.S.

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[13] This is what the Second Circuit was referring to in characterizing the foreign and domestic entities here as "homogenous" and as exhibiting "sameness"—the Circuit was not engaging in any irrelevant veil-piercing analysis (contrary to the Government's characterization, Pet'r Br. 30-31), but explaining why, on the facts here, the Policy Requirement imposes an unconstitutional burden on the domestic respondents.

[14] The Government concedes (Pet'r Br. 28) that it is only "generally" the case that imposing an obligation on A does not implicate the rights of B—inferentially acknowledging, correctly, that there are exceptions to this general rule. The situation created by the Government's proposed enforcement of the Policy Requirement must be recognized as one such exception: The obligation on foreign entity A burdens its close domestic affiliate B by effectively compelling B either to speak the Government's message or to exhibit "evident hypocrisy," *AOSI I*, 570 U.S. at 219. And as respondents explain (Resp. Br. 37-42), there are numerous contexts in which the legal consequences of speech or action are not cabined by the formal distinction between two entities.

affiliates who are made either to adopt the foreign affiliate's compelled speech by implication, or else to expose themselves as evident hypocrites. That is an offer that a conscience-based organization cannot accept. It is an unconstitutional condition.

II. The Government's Proposal For Avoiding The Burden Imposed By A Compelled-Speech Requirement Is Illusory.

The Government asserts, briefly and without citation (Pet'r Br. 32), that "[r]espondents and th[eir] legally distinct foreign * * * affiliates have made a conscious choice to maintain legal independence from each other." The suggestion is that, having obtained the "benefits of that choice" (*ibid.*), the respondents and other multinational religious and humanitarian organizations must forego any claim, on any basis, that injury to one entity causes harm to another—and that the Policy Requirement is not much of a burden on these organizations, because they could avoid it by shifting to a unitary corporate structure. As discussed, the suggestion is legally incorrect: compelling speech by one entity may impose serious burdens on its affiliates' own speech rights notwithstanding their technically distinct legal status.

And the suggestion is also mistaken in its underlying factual premise. As the Second Circuit observed, "international aid organizations" are in many cases "*require[d]* * * * to operate as formally legally distinct entities." Pet. App. 4a (emphasis added); see *id.* at 5a (noting that "some foreign governments require NGOs to be incorporated in their countries in order to be permitted to undertake public health work there"). For example, several African countries—including Egypt,

Ethiopia, Uganda, Zambia, and Zimbabwe—have enacted such requirements.[15] India imposes onerous registration requirements on foreign NGOs, effectively requiring incorporation of a domestic entity.[16] And even where foreign governments have not themselves required separate incorporation, the U.S. Government—including petitioner USAID—has for its own reasons encouraged or even required that U.S. entities participating in programs like the one at issue here do so through registered foreign entities. See J.A. 367-68, 373-76, 390. As respondents explain (Resp. Br. 7), "[f]or many grant opportunities, federal funding is available only to NGOs incorporated locally overseas."

Beyond these legal requirements, some religious organizations such as *amicus* ADRA (and its sponsoring church, the General Conference of Seventh-day Adventists), have determined that their faith dictates a representational organizational structure with distributed authority. The relationships among ADRA and its affiliates closely track the relationships among branches of the Seventh-day Adventist Church: An international body (ADRA) takes responsibility for coordinating and providing leadership worldwide, but lo-

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[15] See J.A. 368 ("[Respondent] Pathfinder has a foreign affiliate in Egypt because regulations of the Egyptian government made that the only feasible way for Pathfinder to initiate operations in that country."); International Center for Not-for-Profit Law, NGO Laws In Sub-Saharan Africa 3 (2011), https://www.icnl.org/resources/research/global-trends-ngo-law/ngo-laws-in-sub-saharan-africa.

[16] See International Center for Not-for-Profit Law, India Philanthropy Law Report 11-15 (2019), https://www.icnl.org/post/report/india-philanthropy-law.

cal branches retain control and autonomy in designated areas. Consistent with the religious policy of its sponsoring organization (the General Conference of Seventh-day Adventists), ADRA and its affiliates cannot maintain a centralized structure in which all decisions are made in Silver Spring, Maryland. ADRA's preferred organizational structure (like the structures of other religious organizations) is protected by the Religion Clauses from government interference (see page 11, *supra*), and in any event the necessity of maintaining integrity would stop ADRA (or another organization holding similar religious beliefs) from accepting the Government's proposal to adopt a unitary model.

The "conscious choice" posited by the Government is thus in many cases illusory. A religious organization or other NGO that wishes to do charitable work using the President's Emergency Plan for AIDS Relief grants cannot choose to operate in, for example, Egypt or Ethiopia (or many other countries) without incorporating a local entity. So under the Government's proposed application of the Policy Requirement, an entity wishing to operate with U.S. support in one of those countries is left with two options: Take the money, register a separate foreign entity, and adopt the Government's speech as its affiliate's own, and therefore—in its eyes and the eyes of the public—as the overall organization's own; or else do not enter the foreign country in question.

Nor would it be an acceptable compromise to insist that foreign affiliates of religious and other conscience-based organizations abandon all visible connection to their mother entities just to avoid the implication that the church writ large agrees with the

Government's point of view. That too would be an unconstitutional burden on the American organization's right to speak. American religious organizations must be free to conduct their ministries throughout the world, without the Government forcing them to speak against conscience or dictating their internal structure and governance. A contrary holding in this case would unduly and unconstitutionally restrict U.S. churches from carrying out their moral duty to speak with one voice wherever in the world they conduct their ministry or give aid to the needy.

CONCLUSION

"What has been will be again, what has been done will be done again; there is nothing new under the sun." Ecclesiastes 1:9 (NIV). The applications of the Policy Requirement in this case are no different, for First Amendment purposes, from the applications struck down in *AOSI I*. As in *AOSI I*, they impermissibly burden American speakers' First Amendment rights. Their impact, both practical and spiritual, cannot be avoided through corporate law concepts, or through reshuffling of corporate structure. They are therefore unconstitutional conditions, as the Second Circuit correctly held.

The judgment of the court of appeals should be affirmed.

Respectfully submitted.

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