Nos. 19-635, 19-715, 19-760

In the Supreme Court of the United States

DONALD J. TRUMP, *Petitioner*,
v.

CYRUS R. VANCE, JR., in His Official Capacity as District Attorney of the County of New York, *et al.*, *Respondents*.

DONALD J. TRUMP, ET AL., *Petitioners*,
v.

MAZARS USA, LLP, ET AL., *Respondents.*

DONALD J. TRUMP, ET AL., *Petitioners*,
v.

DEUTSCHE BANK AG, ET AL., *Respondents*.

On Writs of Certiorari to the United States Courts of Appeals for the Second Circuit and the District of Columbia Circuit

AMICUS BRIEF OF CHRISTIAN FAMILY COALITION (CFC) FLORIDA, INC. IN SUPPORT OF PETITIONERS

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AMICUS BRIEF OF CHRISTIAN FAMILY COALITION (CFC) FLORIDA, INC., A FLORIDA NOT-FOR-PROFIT CORPORATION

The Christian Family Coalition (CFC) Florida, Inc. ("CFC" or "Amicus"), hereby submits its Brief Amicus Curiae in these 3 cases in support of the President of The United States, Donald J. Trump, in his request to (1) reverse the judgments of the Second and D.C. Circuits, and to (2) order issuance of the injunctions the President seeks to quash the disputed subpoenas.

INTEREST OF THE AMICUS[1]

Amicus is a non-profit corporation registered in Florida since 2003 as a human rights and social justice advocacy organization representing over 500,000 fair-minded voters in the Sunshine State. Amicus actively seeks to protect human rights and social justice in litigation and political forums. These values also are among the President's responsibilities as Chief Executive and Commander-in-Chief under Article II of the Constitution. Amicus has an interest in these cases because the subpoenas at issue are virtually limitless, wide-ranging fishing expeditions into the private financial affairs of the President and his family and pose a plausible risk of serious Presidential distraction

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[1] All parties have consented to the filing of this Amicus Brief. No counsel or other representative or agent of any party in these cases authored any part of this Amicus Brief or exercised any form of control or approval over this Amicus Brief or any portion of it. No person or entity, aside from Amicus or its counsel, made a monetary contribution to the preparation or submission of this Amicus Brief.

from the duties and functions of his Office – to the detriment of the security and welfare of the entire country.

SUMMARY OF ARGUMENT

This Court should reverse the judgments of the Second and D.C. Circuits in these 3 cases and order issuance of the injunctions the President requests.

Amicus fully supports the legal arguments by the President in these 3 cases. Amicus wishes to focus on the practical consequences of these subpoenas in their extraordinary potential for Presidential distraction which is not consistent with Article II of the Constitution.

The subpoenas in all 3 cases – often copied from each other – are massive, unduly intrusive, and virtually limitless fishing expeditions into the private financial affairs of the President and his family. They inevitably will distract and divert the President's attention and focus from the serious affairs of State which besiege his Office on a daily, sometimes hourly basis. Their serious potential for distraction and diversion of Presidential energy and focus are not consistent with Article II of the Constitution and the unique and awesome responsibilities it imposes on the President.

The welfare and security of the country – indeed, of the entire world – demand the President's undivided attention to the responsibilities of his Office unimpaired by the distraction of these blunderbuss subpoenas. They probe every minutia of the President's private finances and those of his family.

Distraction is inevitable and inherent in their breadth and scope. If these subpoenas do not violate Article II of the Constitution, it is difficult to imagine any that would.

Nor are these subpoenas consistent with this Court's jurisprudence which permits only discrete and limited intrusions into the Presidential sphere in terms of subpoenas or personal liability.

The subpoenas violate the spirit of Article II and undermine a significant aspect of the 2016 Presidential election. Article II, as amended by the Twelfth Amendment, prescribes the procedure for electing the President. The people have spoken in their election of Donald Trump. His non-disclosure of his income tax returns and private financial data was a central issue in the election campaign. The people chose him, knowing and accepting this non-disclosure. The present subpoenas are, in effect, an impermissible end run around the election, seeking to undo by compulsory process the Presidential non-disclosure the electorate chose at the ballot box.

Additionally, the subpoena in 19-635 is invalid for a further reason. It violates the Division of Powers and principles of federalism. State and local officials – that subpoena was issued by the local District Attorney in New York County, New York – may not control or impair the President's performance.

ARGUMENT

I. The Subpoenas Should Be Quashed Because of the Plausible Risk They Will Cause Serious Distraction and Diversion From Presidential Duties

Amicus fully supports the President's legal arguments against the disputed subpoenas. There are practical reasons as well under Article II of the Constitution for issuance of the injunctions the President requests in all 3 cases.

In all 3 cases, the respondents' wide-ranging and blunderbuss subpoenas for virtually all the President's income tax returns and financial records for many years pose the plausible risk of serious distraction from the President's performance of his official duties and responsibilities. The likely distraction and diversion from the duties of Office are palpable and real. Article II of the Constitution commands that the subpoena be quashed.

The official duties and responsibilities of the President are daunting. Under Article II of the Constitution, the President is Commander-in-Chief of the nation's armed forces, is responsible for their conduct everywhere in the world, is Chief Executive of the United States government, the nation's representative to the rest of the world, the person responsible for choosing all major department heads and federal judges (subject to Senate approval), and the single person ultimately responsible for the functioning of the entire Executive Branch of Government.

The President has the nuclear-launch codes by his side 24/7, must be ready and focused at a moment's notice to address any crisis at any time anywhere in the world and beyond, is on-call at 3:00 AM no less than 9-5, and requires a live-in office in the White House to discharge his official duties around the clock and around the world.

The details of the present subpoenas show the enormity and breadth of their likely distraction from the President's critical Article II responsibilities. The subpoenas in blunderbuss fashion of varying degrees seek "all" income tax returns, financial statements, work papers, source documents, and much more, for an 8-year period from 2011-2019 in 19-635 (App.pp.117a-120a in Cert.Pet. in 19-635), and for several years in 19-715 and 19-760 (Jt.App.pp.128a-140a in 19-715/760). Any reasonable person targeted by these extremely broad subpoenas would be distracted and actively concerned in their wake.

This is common sense. The subpoenas inherently carry with them the potential for both draconian consequences in their criminal potential and the specter of litigation surprise and guesswork in their enormous breadth. Their effect, if not purpose, will keep any target guessing, concerned, distracted, and in constant contact with one's accountants, advisors and attorneys – precisely the distraction and dysfunction that Presidential immunity and Article II are designed to avoid.

a. Any Competent Attorney Would Recognize The Implications of These Broad-Ranging Subpoenas and Would Demand The Client's Immediate and Ongoing Attention – Confirming Their Serious and Ongoing Distraction

Any competent attorney would recognize this. Any competent attorney whose client was served with broad-ranging subpoenas like these would give the following advice – get in here (attorney's office) immediately so we can assess the situation, examine the documents and consequences, explore possible remedies, and discuss tactics and damage control. In other words, the client ***needs to be distracted*** to cooperate fully with his/her attorney on an ongoing basis to protect his/her rights. To suggest otherwise is to be disingenuous in the extreme. An attorney who gives any lesser advice to a client in this situation would be guilty of legal malpractice as a matter of law.

Respondents ignore this reality. Respondents ignore the real-life consequences of their subpoenas. Respondents may pretend their subpoenas will cause little or no distraction for the President, but their arguments fail when measured against the realistic advice any competent attorney would give to a client in this situation.

This alone highlights the serious and unavoidable distraction these subpoenas will cause. They are inherently incompatible with Article II of the Constitution and the need for the President to focus his energies and attention on the serious, often-life-and-death affairs of state without the distraction these

broad-ranging subpoenas portend. The welfare and security of all Americans, and likely everyone world-wide, demand no less.

b. The Virtually Limitless Scope of the Present Subpoenas Distinguishes Them From the Narrow and Discrete Incursions This Court Has Permitted Into the Presidential Sphere

The far-reaching and intrusive reach of the present subpoenas distinguishes these cases from decisions of this Court which allowed limited judicial inroads into the President's time and energies. Specifically, the wide-ranging and virtually limitless reach of these subpoenas distinguishes them from the narrow and discrete exceptions to Presidential immunity allowed in *Clinton v. Jones,* 520 U.S. 681 (1997), and *U.S. v. Nixon,* 418 U.S. 683 (1974).

An examination of *Clinton* and *Nixon* underscores the point. In *Clinton* this Court allowed Ms. Paula Jones to pursue her claim against the sitting President Clinton arising from ***discrete and limited*** instances of sexual abuse by Mr. Clinton occurring prior to his Presidency. This Court in *Clinton* discussed the relatively limited intrusion that the action – which arose from specific discrete events primarily on a single day in 1991 (520 U.S. at 685) – would portend for the functioning of the Clinton Presidency. *Id.,* at 691-92. This Court held that "separation-of-powers principles would [not] be violated by allowing ***this action*** to proceed." *Id.,* at 699 (emp.added). This Court in *Clinton* further underscored the limited nature of the intrusion from Ms. Jones's highly specific claim by analogizing it

to – and implicitly approving – two similarly non-intrusive lawsuits against President Kennedy arising from a single automobile accident occurring prior to his Presidency. *Id.,* at 692.

This Court permitted the same type of limited intrusion into Presidential administration in *U.S. v. Nixon.* In *Nixon* this Court upheld a relatively narrowly focused criminal trial subpoena for discrete communications between President Nixon and some of his aides when the latter were criminal defendants. This Court in *Nixon* underscored the extremely limited intrusion of the subpoena because it reflected a "demonstrated specific need for evidence" consisting of "disclosure of a ***limited number of conversations"*** (418 U.S. at 713; emp.added).

Thus the discrete and limited foci of both the lawsuit in *Clinton* and subpoena in *Nixon* underscored the limited nature of any intrusion or dysfunction they would cause. Neither would adversely affect Presidential administration or the President's responsibilities and duties under Article II. Neither a single lawsuit arising from discrete sexual acts (*Clinton*) nor a subpoena compelling "disclosure of a limited number of conversations" (*Nixon*) would impair the proper functioning of the Presidency or present a plausible risk that Presidential energies or focus would be diverted or distracted in a material way.

Clinton and *Nixon* stand in extreme contrast to the present subpoenas. The present subpoenas collectively are blunderbuss, broad, and virtually limitless commands for production of "all" income tax returns, financial statements, financial records, supporting

papers, and far more, concerning the President, his family, and his vast multi-billion-dollar business enterprise spanning a period of 9 years since 2011 in 19-635 (Cert.Pet.App.pp.117a-120a in 19-635), and either 4 years, 9 years, or without time limit in 19-710/765 (Jt.App.pp.265a-266a, 2d Cir.Op. in 19-710/765).

There is no way the present subpoenas are consistent with proper and reasonable functioning of the Presidential Office. The subpoenas require inordinate focus and distraction from any other calling or endeavor. The ultimate victims will be the American citizenry and indeed all persons worldwide who depend on the President's undistracted attention to the weighty matters of state and the pursuit of world peace.

c. The Rationales Employed by the Second and D.C. Circuits are Misplaced

In each of these 3 cases, the Circuit Courts used flawed rationales to dismiss arguments of Presidential distraction. In 19-635, the Second Circuit belittled the intrusive nature of the subpoena, reasoning it "does not require the President to do anything at all" (Cert.Pet.App.p.20a in 19-635) – apparently because the subpoena technically was directed not to the President but to his accountants who hold his financial and tax records. The Second Circuit focused on the wrong burden. The problem is not the burden of production but the burdens of distraction and diverted attention. The latter burdens are real and palpable under the present subpoenas which pose a plausible risk of substantial distraction and diversion from

Presidential duties in violation of Article II of the Constitution.

In 19-760 a different panel of the Second Circuit also erred in rejecting arguments of Presidential distraction. The panel in 19-760 acknowledged that where Presidential records are subpoenaed, a court would need to consider "the objection that it would distract the Chief Executive in the performance of official duties" (Jt.App.p.263a in 19-715/760). However, the panel then dismissed arguments of Presidential distraction in the case before it by relying erroneously on this Court's decision in *Clinton v. Jones, supra.* The panel held that "any concern arising from the risk of distraction in the performance of the [President's] official duties is minimal in light of the Supreme Court's decision in *Clinton v. Jones*" (Jt.App.p.309a in 19-715/760). But *Clinton v. Jones* is far off the mark. As discussed in detail above, the narrowly focused and limited intrusion into the Presidential sphere allowed by this Court in *Clinton v. Jones* – arising from a single sexual encounter – is light years away from the massive and virtually limitless distraction imposed under the sheer weight and breadth of the present subpoenas (pp.7-9 *supra*). There is no way *Clinton v. Jones* even begins to support the subpoenas.

Finally, in 19-715 the D.C. Circuit repeated the mistakes of the two Second Circuit panels. The D.C. Circuit dismissed concerns over Presidential distraction on the ground that it is the President's accountants, not the President, who will incur the burden to "retrieve and organize the relevant information" (Cert.Pet.App.p.75a in 19-715). This

repeated the mistake of the first panel of the Second Circuit which had focused on the burden of production rather than burden of distraction. The D.C. Circuit then repeated the mistake of the second panel of the Second Circuit. It cited *Clinton v. Jones* as precedent to support the subpoena's allegedly permissible "burden on the time and attention of the Chief Executive" (Cert.Pet.App.p.75a in 19-715). Like the Second Circuit, the D.C. Circuit erred by disregarding the drastic differences ***between*** the minimal "burden" in the narrowly focused litigation in *Clinton v. Jones* ***and*** the massive burdens and distractions occasioned under the wide-ranging subpoenas in the present cases (pp.7-9 *supra*).

In short, the rationales employed by the Second and D.C. Circuits are misplaced. They focus on the wrong burdens, trivialize the realistic burdens of distraction confronting the President, and mistakenly rely on this Court's decision in *Clinton v. Jones* whose narrow facts do not begin to support the heavy burdens imposed by the present subpoenas.

Worse, by ignoring the burdens on the President, the Second and D.C. Circuits ignore the ultimate burdens suffered by the American citizenry who must depend on an undistracted and unimpaired Chief Executive to protect the country and secure world peace.

d. This Court Has Recognized the Need for Complete Presidential Immunity To Prevent the Type of Distraction These Subpoenas Portend

This Court has underscored the disastrous potential for Presidential distraction that compels a finding of Presidential immunity. In *Nixon v. Fitzgerald,* 457 U.S. 731 (1982), this Court held that the President is immune from personal liability for official acts performed in office because of the serious potential for Presidential distraction over fears of personal liability. This Court held:

> "Because of the singular importance of the President's duties, diversion of his energies by concern with private lawsuits would raise unique risks to the effective functioning of government. As is the case with prosecutors and judges – for whom absolute immunity is now established – a President must concern himself with matters likely to arouse the most intense feelings.... Nor can the sheer prominence of the President's office be ignored. In view of the visibility of his office and the effect of his actions on countless people, the President would be an easily identifiable target for suits for civil damages. Cognizance of this personal vulnerability frequently could distract a President from his public duties, to the detriment of not only the President and his office but also the Nation that the Presidency was designed to serve."

Nixon v. Fitzgerald, 457 U.S. at 751-53.

Admittedly, *Nixon v. Fitzgerald* dealt with Presidential immunity for official acts rather than immunity from litigation over private acts. But the distraction and diversion of energies that both cause are the same especially where, as here, the titanic nature of the subpoenas concerning private acts carries over into the public sphere and creates a plausible risk of diversion of energies and distraction from official Presidential duties.

This Court's later analysis of *Nixon v. Fitzgerald* is not inconsistent with this result. In *Clinton v. Jones,* this Court explained that the "dominant concern" in *Nixon v. Fitzgerald* was to protect the President from liability for official acts by enabling the President to make official decisions without "diversion of the President's attention" caused by concerns over a later damage action. 520 U.S. at 694 n.19. But the fact that this was the "dominant concern" in *Nixon v. Fitzgerald* does not mean it was the only concern. This Court's broader recognition in *Nixon v. Fitzgerald* – of the deleterious effects that the judicial process (including subpoenas) may have on Presidential function and performance – applies as much to overbroad intrusion into private matters as to personal liability arising from official acts.

This Court left open exactly this issue in *Clinton v. Jones.* In *Clinton* this Court recognized that – and expressly did not decide whether – an "exceptional case[ ]" may require a blanket Presidential immunity from a particular judicial process notwithstanding its origin in private rather than official acts (520 U.S. at 690n.12: not decide "exceptional case[ ]"). For this

purpose, the present petition clearly involves an "exceptional case" warranting Presidential immunity and entry of the requested injunction. The enormous breadth and depth of the wide-ranging subpoenas in the present cases – and the distraction and diversion of Presidential energy and focus they will cause – distinguish these cases from the discrete and limited incursions into Presidential time this Court permitted in *Clinton v. Jones* for the single lawsuit arising from discrete acts of sexual harassment or in *U.S. v. Nixon* for the specific and limited trial subpoena for "disclosure of a limited number of conversations."

Indeed, if these cases are not "exceptional cases" warranting Presidential immunity, it is hard to imagine any case that would be. The integrity and function of the Presidency clearly warrant the injunctions the President seeks.

e. The Present Subpoenas Violate the Spirit of Article II and Undermine a Significant Aspect of the 2016 Presidential Election

Article II of the Constitution, as amended by the Twelfth Amendment, prescribes the procedure for electing the President. The people have spoken in their election of Donald Trump. His non-disclosure of his income tax returns and private financial data was a central issue in the 2016 Presidential election campaign. The people elected him, knowing and accepting this non-disclosure. If democratic elections of the President are to mean anything, their expression of popular preference should weigh heavily in the resolution of this Article II dispute. Under authority of this exact same constitutional provision, the people

have already decided the issue of non-disclosure in the exercise of their democratic prerogatives.

Viewed in this perspective, the present subpoenas are nothing less than an impermissible end run around the 2016 election. They seek to undo by compulsory process the Presidential non-disclosure the people have already chosen at the ballot box.

f. The Issue Raised by the Petitions is Not a Partisan or Political Issue, But an Institutional Issue Upon Which the Integrity of the Presidential Office Depends

This is not a political or partisan issue. Rather, this is an issue that goes to the heart and soul of the Presidential Office and the President's ability to function effectively as the elected Chief Executive of the nation. This is an issue which cuts across party lines and transcends partisan beliefs. A Republican or Conservative President today who is victimized by an abusive subpoena issued by Democratic or liberal governmental officials may be followed tomorrow by a Liberal Democratic President victimized by a similar subpoena issued by Conservative Republican opponents. Neither is permissible. Neither can withstand scrutiny under Article II of the Constitution. The protection of the institution of the Presidency requires the injunction the President seeks.

For these reasons, the President's ability to perform his Article II responsibilities unimpaired by distractions from respondents' wide-ranging blunderbuss subpoenas mandates reversal of the

judgments of the Second and D.C. Circuits with directions to issue the injunctions the President requests.

II. In 19-635, The Subpoena Should Be Quashed Also Because State and Local Authorities May Not Issue Process Which Impairs The President's Ability to Perform His Official Duties

In addition to the above reasons for granting the requested injunctions, the nature of our federal system separately requires an injunction in 19-635. The subpoena in 19-635 emanates not from a federal authority but from the local District Attorney in New York County, New York. This Court has consistently held that State and local officials may not use their powers to impair or affect the functions of federal officials. *Clinton v. Jones,* 520 U.S. at 691 n.13 ("Because [of] the Supremacy Clause … any direct control by a state court over the President … may implicate concerns that are quite different from the inter-branch separation-of-powers questions addressed here [federal court vs. President]");[2] *see also Johnson v. Maryland,* 254 U.S. 51 (1920) (State may not require U.S. Post Office mail-truck driver to obtain State driver's license); *Osborn v. Bank of United States,* 22 U.S. 738, 867-68 (1824) (State may not control or tax

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[2] This Court in *Clinton v. Jones* expressly declined to decide whether a State court action could proceed against the President, 520 U.S. at 691, while strongly intimating that it may not. *Id.,* at 691 n.13.

an entity of the federal government); *M'Culloch v. Maryland,* 17 U.S. 316, 429-30 (1819) (same).

The import and lesson of these cases are clear. They restrict State authority which purports to control or impair in any way the official performance of a federal governmental official or entity. That is, "the activities of the Federal Government are free from regulation by any State." *Mayo v. U.S.,* 319 U.S. 441, 445 (1943). This principle should apply with special vigor to protect the Office of the President – the federal government's Chief Executive officer – from assertions of control by State courts.

There are an estimated 2,300+ local prosecuting attorneys' offices throughout the United States (Pet.br.pp.25-26 in 19-635). The potential for abuse and political mischief is obvious. Many local District Attorneys, if not most – including the respondent in 19-635 – are elected in partisan elections with strong political biases. Not surprisingly, the respondent District Attorney in 19-635 is an elected Liberal Democrat who has served his wide-ranging criminal subpoena seeking information and documents from a Conservative Republican President. To allow this kind of political gamesmanship to infect and distract the Presidency with compulsory subpoena process is to degrade the Office of the President and expose every future President to the same meddling, control, distraction and abuse.

If allowed in this case, then every future President – especially Presidents with extensive business holdings – will be vulnerable to the same abuse and degradation. It will not matter whether the President

is a Democrat, Republican, Liberal, Conservative, or otherwise. There will always be some local prosecutor somewhere – among the 2,300+ in the United States – who will want to follow suit against any given President, if allowed in 19-635. Article II of the Constitution and the integrity of the Office of the President command that this be shut down, now.

CONCLUSION

It bears emphasis that the impermissibility of the State court subpoena in 19-635 is merely an ***additional*** reason to quash the subpoena in that particular case. The primary reason, discussed above, remains and applies in all 3 cases under review: The subpoenas are not confined to the type of discrete and limited intrusion into the Presidential function allowed in *Clinton v. Jones* or *U.S. v. Nixon* but instead constitute wide-ranging, virtually limitless and blunderbuss commands for production of documents that trigger a plausible risk of serious Presidential distraction and diversion of energy and focus that will impair the ability of the President to perform his official duties.

The subpoenas contravene Article II of the Constitution. This Court should reverse the judgments of the Second and D.C. Circuits and order entry of the injunctions the President requests.

Respectfully submitted,

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