No. 21-454

# In The
# Supreme Court of the United States

MICHAEL SACKETT; CHANTELL SACKET,

*Petitioners,*

v.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY; MICHAEL S. REGAN, Administrator,

*Respondents.*

**On Writ Of Certiorari To The United States Court Of Appeals For The Ninth Circuit**

## BRIEF OF ATLANTIC LEGAL FOUNDATION, CONSERVATIVES FOR PROPERTY RIGHTS & COMMITTEE FOR JUSTICE AS *AMICI CURIAE* IN SUPPORT OF PETITIONERS


NANCIE G. MARZULLA
MARZULLA LAW, LLC
1150 Connecticut Ave., NW
Washington, DC 20036
(202) 822-6760

LAWRENCE S. EBNER
*Counsel of Record*
ATLANTIC LEGAL FOUNDATION
1701 Pennsylvania Ave., NW
Washington, DC 20006
(202) 729-6337
lawrence.ebner@atlanticlegal.org

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## INTEREST OF THE *AMICI CURIAE* [1]

Established in 1977, the **Atlantic Legal Foundation** is a national, nonprofit, nonpartisan, public interest law firm whose mission is to advance the rule of law and civil justice by advocating for individual liberty, free enterprise, property rights, limited and efficient government, sound science in judicial and regulatory proceedings, and school choice. With the benefit of guidance from the distinguished legal scholars, corporate legal officers, private practitioners, business executives, and prominent scientists who serve on its Board of Directors and Advisory Council, the Foundation pursues its mission by participating as *amicus curiae* in carefully selected appeals before the Supreme Court, federal courts of appeals, and state supreme courts. *See* atlanticlegal.org.

**Conservatives for Property Rights** is a coalition of conservative organizations that stand for private property rights. The coalition believes that property rights are divinely endowed to human beings on account of their humanity, and that private property is essential to the functioning of free enterprise, investing one's resources in discovery and creativity, and the exercise of ordered liberty. *See* property-rts.org.

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[1] Petitioners' and Respondents' counsel of record have consented to the filing of this brief. In accordance with Sup. Ct. R. 37.6, *amici* certify that no counsel for a party authored this brief in whole or part, and that no party or counsel other than the *amici* or their members or counsel made a monetary contribution intended to fund preparation or submission of this brief.

Founded in 2002, the **Committee for Justice** (CFJ) is a nonprofit, nonpartisan legal and policy organization dedicated to promoting the rule of law and preserving the Constitution's limits on federal power and its protection of individual liberty. Central to this mission is the robust enforcement of the Bill of Rights, including the Fifth Amendment's protection of property rights that is at issue in this case. CFJ advances its mission by supporting constitutionalist nominees to the federal judiciary, filing *amicus curiae* briefs in key cases, analyzing judicial decisions with respect to the rule of law, and educating government officials and the American people about the Constitution and the proper role of the courts. *See* committeeforjustice.org.

* * *

*Amici* are filing this brief because they believe that the federal government's virtually limitless view of the Clean Water Act's regulatory boundaries, particularly with regard to wetlands, not only interferes with private ownership and use of real property, but also violates landowners' Fifth Amendment right to be justly compensated for the taking of their property. The Takings Clause (also commonly referred to as the Just Compensation Clause) recognizes that private ownership of property, and in turn, economic liberty, are intrinsic to our nation's social fabric.

This appeal affords the Court a fresh, timely, and vitally important opportunity to interpret the Clean Water Act's operative phrase—"the waters of the United States"—in a way that restores sanity to the government's continually expanding and often arbitrary regulation of privately owned "wetlands."

The Court should take care to avoid any statutory construction that has the potential for raising "takings" or other constitutional issues. By so doing, the Court not only will continue to respect the constitutional prohibition against uncompensated takings, but also the right to own and enjoy the use of property. "[A] fundamental interdependence exists between the right to liberty and the personal right in property. Neither could have meaning without the other." *Lynch v. Household Fin. Corp.*, 405 U.S. 538, 552 (1972).

## SUMMARY OF ARGUMENT

Interpretation of the Clean Water Act's pivotal but undefined phrase, "the waters of the United States," 33 U.S.C. § 1362(7), directly implicates the Takings Clause, U.S. Const. amend. V ("nor shall private property be taken for public use, without just compensation").

The U.S. Environmental Protection Agency ("EPA") and the U.S. Army Corps of Engineers impose Clean Water Act permitting requirements in connection with discharge of dredged or fill material on any private property that those agencies deem "wetlands" encompassed by "the waters of the United States"—the baffling phrase that Congress chose to define "navigable waters" subject to the Act's pollutant discharge prohibitions. *See* 33 U.S.C. §§ 1344 (Permits for dredged or fill material) ("Section 404 permits") & 1362(7) (definition of "navigable waters"); *Rapanos v. United States*, 547 U.S. 715, 723 (2006) (summarizing statutory scheme).

As a practical matter, these two agencies' aggressive regulation of private property often deprives property owners of the right to use their land in any economically viable manner. For this reason, the unforgiving case-by-case enforcement of the expansive regulatory regime that EPA and the Corps have read into, and constructed from, the phrase, "the waters of the United States," poses a significant potential for myriad takings of private property without just compensation.

The issue of the proper test for determining whether particular wetlands are "waters of the United States" is before the Court again because its prior decisions have not succeeded in cabining the government's "immense expansion of federal regulation of land use that has occurred under the Clean Water Act — without change in the governing statute." *Rapanos*, 547 U.S. at 722; *see Sackett v. EPA* ("*Sackett I*"), 566 U.S. 120, 123-24 (2012) (summarizing the Court's holdings in *United States v. Riverside Bayview Homes, Inc.*, 474 U.S. 121 (1985); *Solid Waste Agency of Northern Cook Cty. v. U.S. Army Corps of Engineers* ("*SWANCC*"), 531 U.S. 159 (2001), and *Rapanos*). As Justice Alito observed in *Sackett I*, "[a]ny piece of land that is wet at least part of the year is in danger of being classified by EPA employees as wetlands covered by the Act, and according to the Federal Government, if property owners begin to construct a home on a lot that the agency thinks possesses the requisite wetness, the property owners are at the agency's mercy." 566 U.S. at 132 (Alito, J., concurring).

The Petitioners are urging the Court to adopt the *Rapanos* plurality's view that "*only* those wetlands with a continuous surface connection to bodies that are 'waters of the United States' in their own right, so that there is no clear demarcation between 'waters' and wetlands, are 'adjacent to' such waters and covered by the Act." *Rapanos*, 547 U.S. at 742. They agree with the *Rapanos* plurality that this "surface connection" test is compelled by the statutory text, *see id.* at 739-42, and that the alternative, "significant nexus" standard proposed by Justice Kennedy in his *Rapanos* concurring opinion is "an implausible reading of the statute." *Id.* at 756.

Under the significant nexus test—which requires no surface or physical connection between a putative wetland and navigable waters—"wetlands possess the requisite nexus, and thus come within the statutory phrase 'navigable waters,' if the wetlands, either alone or in combination with similarly situated lands in the region, significantly affect the chemical, physical, and biological integrity of other covered waters more readily understood as 'navigable.'" *Id.* at 780 (Kennedy, J., concurring in the judgment). The *Rapanos* plurality, *id.* at 740, however, rejected the notion that "a wetland may be considered 'adjacent to' remote 'waters of the United States,' because of a mere hydrologic connection to them." Instead, the plurality held that "the Act's use of the traditional phrase 'navigable waters' (the defined term) further confirms that it confers jurisdiction only over relatively *permanent* bodies of water." *Id.* at 734. According to the plurality, "[w]etlands are 'waters of the United States' if they bear the 'significant nexus' of physical

connection, which makes them as a practical matter *indistinguishable* from waters of the United States." *Id.* at 755. But "[w]etlands with only an intermittent, physically remote hydrologic connection to 'waters of the United States' . . . lack the necessary connection to covered waters." *Id.* at 742.

The Court should definitively adopt the *Rapanos* plurality's surface connection (i.e., physical connection) test as a necessary condition for establishing Clean Water Act jurisdiction over wetlands. Even if the broad and vague significant nexus test were a plausible standard for determining whether a particular wetland is part of "the waters of the United States," the Court should reject it based on the canon of constitutional avoidance. Under this "elementary principle of statutory interpretation . . . an ambiguous statute must be interpreted, whenever possible, to avoid unconstitutionality." *United States v. Davis*, 139 S. Ct. 2319, 2350 (2019) (Kavanaugh, J., dissenting). The modern version of the constitutional avoidance canon "suggests courts should construe ambiguous statutes to avoid the need even to address serious questions about their constitutionality." *Id.* at 2332 n.6 (citing *Rust v. Sullivan*, 500 U.S. 173, 190-91 (1991)).

The canon of constitutional avoidance requires rejection of the significant nexus test because, unlike the surface connection test, it often will raise serious, case-by-case Fifth Amendment takings issues. Indeed, as this appeal illustrates, the more disconnected a particular parcel of land is from "relatively permanent, standing, or continuously flowing bodies of water," *Rapanos*, 547 U.S. at 732, the

more likely is the property owner to develop the land with impunity. And thus, there is a greater potential for an uncompensated taking, as well as for imposition of onerous civil and criminal penalties if the federal government suddenly claims that the landowner's partially or fully developed property is a wetland subject to the Clean Water Act.

## ARGUMENT

### The Court Should Interpret "The Waters of the United States" In a Way That Avoids Fifth Amendment Takings Issues

#### A. Clean Water Act regulation of wetlands can raise Fifth Amendment takings concerns

In *Riverside Bayview*, 474 U.S. at 126-28, the Court recognized that Clean Water Act regulation of wetlands can result in a Fifth Amendment taking of property. As here, the case involved proposed residential construction on property that EPA asserted was a wetland subject to Clean Water Act permitting requirements. *Id.* at 123-24. The Court agreed with EPA that an Army Corps of Engineers permit was required because "the wetland located on respondent's property was adjacent to a body of navigable water." *Id.* at 131.

Prior to reaching this conclusion, the Court considered whether "regulatory authority under the statute and its implementing regulations must be narrowly construed to avoid a taking without just compensation in violation of the Fifth Amendment." *Id.* at 126. The Court held that because "neither the imposition of the permit requirement itself nor the

denial of a permit necessarily constitutes a taking . . . a narrow reading of the Corps' regulatory jurisdiction over wetlands [is not] necessary to avoid a serious taking problem." *Id.* at 127 (internal quotation marks omitted). Citing land-use precedent, the Court reaffirmed, however, that a land-use regulation *can* effect a taking if it "'denies an owner economically viable use of his land.'" *Id.* at 126 (quoting *Agins v. Tiburon*, 447 U.S. 255, 260 (1980)). More specifically, in the Clean Water Act context, the Court explained that "[o]nly when a permit is denied and the effect of the denial is to *prevent 'economically viable' use of the land* in question can it be said that a taking has occurred." *Id.* at 127 (emphasis added).

Noting that the Corps had denied an application for a permit, the Court acknowledged that the *Riverside Bayview* property owner "may well have a ripe claim that a taking has occurred." *Id.* at 129 n.6. Nonetheless, the Court had "no basis for evaluating this claim, because no evidence has been introduced that bears on the question of the extent to which denial of a permit to fill this property will prevent economically viable uses of the property or frustrate reasonable investment-backed expectations." *Id.*

According to *Riverside Bayview*, "even if a permit is denied, there may be other viable uses available to the owner." *Id.* at 127. In reality, however, the "exception" that triggers a regulatory taking under the Clean Water Act—depriving property owners of "economically viable uses" of their land—is the *norm* in the vast majority of cases where EPA asserts that private property is a wetland. Not surprisingly, *Riverside Bayview* nowhere identifies any

economically viable uses of privately owned property that is located on what the government claims is a wetland subject to Clean Water Act regulation, much less alternative uses in connection with property that is locally zoned for residential development.

For most property owners, obtaining a Section 404 Clean Water Act permit from the Army Corps of Engineers for construction of a residence is not a realistic option. Justice Scalia explained that "[i]n deciding whether to grant or deny a permit, [the Corps] exercises the discretion of an enlightened despot, relying on such factors as 'economics,' 'aesthetics,' 'recreation,' and 'in general, the needs and welfare of the people.'" *Rapanos*, 547 U.S. at 721 (citing 33 C.F.R. § 320.4(a) (General policies for evaluating permit applications) (Public interest review)). As to wetlands specifically, the Corps' longstanding policy is that "[m]ost wetlands constitute a productive and valuable public resource, *the unnecessary alteration or destruction of which should be discouraged as contrary to the public interest*." 33 C.F.R. § 320.4(b)(1) (emphasis added); *see also id.* § 328.3(c)(16) (definition of "Wetlands"). In other words, the Corps' published policy is to deny permits for economically viable uses of most privately owned wetlands, thus unavoidably triggering takings issues.

Anyone who nonetheless is inclined to apply for a Corps of Engineers permit to construct a residence (or business) on, or otherwise develop, privately owned wetland property will be confronted with years-long delays and hundreds of thousands of dollars in consulting fees and other costs. *See Rapanos*, 547 U.S. at 721 ("The burden of federal regulation on those who

would deposit fill material in locations denominated 'waters of the United States' is not trivial."). Although these costs and burdens do not themselves effect a regulatory taking, they, along with the Corps' overly broad and protective wetlands policy, make it practically impossible for individual property owners to obtain a permit. Thus, in most cases, an uncompensated taking of residentially zoned property that the government considers to be a wetland subject to Clean Water Act regulation cannot be avoided by applying for a Clean Water Act permit.

Property owners such as Petitioners, who prior to commencing excavation, backfilling, or construction, were unaware that EPA considers (or in the future may consider) their property to be a federally regulated wetland, can be served with an administrative compliance order "demanding that the owners cease construction, engage in expensive remedial measures, *and abandon any use of the property*." *Sackett I*, 566 U.S. at 132 (Alito, J., concurring) (emphasis added). If such property owners fail "to dance to the EPA's tune," they can be subjected to "draconian penalties" and haled into court by EPA. *Id.*; *see* 33 U.S.C. § 1319 (Enforcement). Here, for example, the administrative compliance order issued by EPA "informed the Sacketts that failure to comply could result in civil and administrative penalties of over $40,000 per day." Pet. App. A-9; *see also Rapanos*, 547 U.S. at 721 ("Mr. Rapanos faced 63 months in prison and hundreds of thousands of dollars in civil and criminal fines."). "In a nation that values due process, not to mention

private property, such treatment is unthinkable." *Sackett I*, 566 U.S. at 132 (Alito, J., concurring).

Where, as here, the government's uncompensated taking of private property is *selective*, the fairness principle also raises takings concerns. *See generally Armstrong v. United States*, 364 U.S. 40, 49 (1960) ("The Fifth Amendment's guarantee that private property shall not be taken for a public use without just compensation was designed to bar Government from forcing some people alone to bear public burdens which, in all fairness and justice, should be borne by the public as a whole."). Petitioners were singled out by EPA for trying to build a home on their lot, despite all their neighbors having done so before them. Thus, "there is 'a separate fairness question presented by the Sacketts' situation. If some people have filled and built on an isolated corner of larger wetlands, should others be constrained from doing likewise?'" Brian Gray, *Fragmented Regulation of Multiple Stressors: A Cautionary Tale for Takings Law*, 19 Hastings W.-Nw. J. Envtl. L. & Pol'y 341, 342 (2013) (quoting Felicity Barringer, *Wetlands? What Wetlands?*, N.Y. Times Green Blog, Apr. 20, 2011).

Imposing on a single landowner burdens that are not imposed on neighboring or other similarly situated property owners undermines the property-ownership protection embodied by the Fifth Amendment, even if such burdens are intended to achieve environmental objectives that supposedly are in the public interest. Throughout the United States there are countless other landowners who, like Petitioners, are knowingly (or unknowingly) precluded from using their property in any

economically viable way because of the federal government's expansive view of wetlands. Petitioners and other seemingly arbitrary targets of virtually unbounded environmental regulation bear the costs of continuing to own such unusable "wetlands" property.

Unlike Petitioners, few property owners have the resources, time, and stamina to challenge an EPA wetlands determination in court. And where the government has failed to respect its Fifth Amendment obligations, pursuing a costly and lengthy Tucker Act inverse condemnation suit in the Court of Federal Claims, 28 U.S.C. § 1491, "to provide compensation for takings that may result from the Corps' exercise of jurisdiction over wetlands," *Riverside Bayview*, 474 U.S. at 128, is arduous.

### B. Insofar as the meaning of "the waters of the United States" is ambiguous, the Court should apply the canon of constitutional avoidance

"Under the constitutional-avoidance canon, when statutory language is susceptible of multiple interpretations, a court may shun an interpretation that raises serious constitutional doubts and instead may adopt an alternative that avoids those problems." *Jennings v. Rodriguez*, 138 S. Ct. 830, 836 (2018); *see also Commodity Futures Trading Comm'n v. Schor*, 478 U.S. 833, 841 (1986) ("Where such 'serious doubts' arise, a court should determine whether a construction of the statute is 'fairly possible' by which the constitutional question can be avoided.") (quoting *Crowell v. Benson*, 285 U.S. 22 (1932)); *Morrison v. Olson*, 487 U.S. 654, 682 (1988) ("[I]t is the duty of federal courts to construe a statute in order to save it

from constitutional infirmities . . . ."). "This Court's longstanding practice of saving ambiguous statutes from unconstitutionality where fairly possible affords proper respect for the representative branches of our Government." *United States v. Davis*, 139 S. Ct. at 2350 (Kavanaugh, J., dissenting).

If one thing in this case is clear, it is that the meaning of "the waters of the United States" is not. In his concurring opinion in *Sackett I*, Justice Alito explained that

> [t]he reach of the Clean Water Act is *notoriously unclear*. Any piece of land that is wet at least part of the year is in danger of being classified by EPA employees as wetlands covered by the Act . . . .
>
> Congress did not define what it meant by "the waters of the United States" . . . and the words themselves are *hopelessly indeterminate*. Unsurprisingly, the EPA and the Army Corps of Engineers interpreted the phrase as an essentially limitless grant of authority. We rejected that boundless view, see *Rapanos v. United States*; *Solid Waste Agency of Northern Cook Cty. v. Army Corps of Engineers*, but the precise reach of the Act *remains unclear*. For 40 years, Congress has done nothing to resolve *this critical ambiguity* . . . .
>
> [O]nly clarification of the reach of the Clean Water Act can rectify the underlying problem.

*Sackett I*, 566 U.S. at 132-33 (Alito, J., concurring) (citations omitted) (emphasis added); *see also Rapanos*, 547 U.S. at 752 ("'W]aters of the United States' is in *some* respects ambiguous. The *scope* of that ambiguity, however, does not conceivably extend to whether storm drains and dry ditches are 'waters' . . . ."); *id.* at 724, 726 (describing the Corps' "sweeping assertions of jurisdiction," to "the outer limits of Congress's commerce power"); *id.* at 758 (Roberts, C.J., concurring) (referring to the Corps' "essentially boundless view of the scope of its power"); Pet. App. A-6 (Ninth Circuit panel opinion) ("Since the [Clean Water Act] was enacted, agencies and courts have struggled to identify the outer definitional limits of the phrase 'waters of the United States' . . . .").

This Court, however, does not have to decide whether the Clean Water Act's obtuse definition of "navigable waters" as "the waters of the United States," *see* 33 U.S.C. § 1362(7), is unconstitutional. Instead, the modern canon of constitutional avoidance "amounts to a general principle of abstention: if one reading of a statute would force courts to confront hard constitutional questions, courts should prefer an alternative reading that lets them duck those questions." Caleb Nelson, *Avoiding Constitutional Questions Versus Avoiding Unconstitutionality*, 128 Harv. L. Rev. F. 331, 334 (2015). In other words, "[t]he so-called 'modern' avoidance canon counsels that 'a statute should be interpreted in a way that avoids placing its constitutionality in doubt.'" Brian Taylor Goldman, *The Classical Avoidance Canon as a Principle of Good-Faith Construction*, 43 J. Legis. 170, 173 (2016) (quoting Antonin Scalia & Bryan Garner,

*Reading Law* 247 (2012)); *see also* Neal Kumar Katyal & Thomas P. Schmidt, *Active Avoidance: The Modern Supreme Court and Legal Change*, 128 Harv. L. Rev. 2109, 2117 (2015) ("Modern avoidance holds that constitutional *doubts* are enough to trigger the canon, without any need to adjudicate actual unconstitutionality."); Eric S. Fish, *Constitutional Avoidance as Interpretation and as Remedy*, 114 Mich. L. Rev. 1275, 1280 (2016) ("Under the classic canon a court only avoids interpretations that actually violate the Constitution, while under the modern canon a court also avoids interpretations that merely raise constitutional 'doubts.'"); *see generally United States v. Davis*, 139 S. Ct. at 2332 n.6 (referring to the "constitutional doubt canon").

Here, the Court should avoid interpreting "the waters of the United States" in a way that raises constitutional doubts. The "significant nexus" test for determining whether a particular putative wetland falls within "the waters of the United States" raises constitutional doubts, and therefore, the Court should not adopt it.

These constitutional doubts include whether a takings issue will arise whenever EPA or the Corps seek to "establish a significant nexus on a case-by-case basis." *Rapanos*, 547 U.S. at 782 (Kennedy, J., concurring in the judgment). According to Justice Kennedy, "in most cases regulation of wetlands *that are adjacent to tributaries* and possess a significant nexus with navigable waters will raise no serious constitutional or federalism difficulty." *Id.* (emphasis added). This probably is true where a wetland has a continuous surface connection to navigable waters,

and thus, uninformed development is unlikely. For this same reason, the *Rapanos* plurality's surface connection test in most cases should raise no constitutional doubts or concerns. The Court can adopt it as a necessary test for determining whether a particular wetland is part of "the waters of the United States" without rewriting the Clean Water Act. *See generally Seila Law LLC v. CFPB*, 140 S. Ct. 2183, 2206 (2020) ("Constitutional avoidance is not a license to rewrite Congress's work to say whatever the Constitution needs it to say in a given situation.").

But what about wetlands that are *not* adjacent to navigable waters, *i.e.*, where a "significant nexus" with navigable waters is far from apparent, and thus, where development is more likely to occur than where there is a physical surface connection? The owner of such property—such as the Sacketts here—would have good reason to assume that compliance with local zoning and permitting requirements provides the only green light needed to proceed with constructing a home or business. After all, the Clean Water Act expressly recognizes state and local primacy over land use regulation. *See* 33 U.S.C. § 1251(b); *Rapanos*, 547 U.S. at 738 ("[T]he Government's expansive interpretation would 'result in a significant impingement of the States' traditional and primary power over land and water use.' . . . Regulation of land use . . . is a quintessential state and local power.") (quoting *SWANCC*, 531 U.S. at 174); *SWANCC*, 531 U.S. at 173 (discussing the Court's heightened concern "where the administrative interpretation alters the federal-state framework by permitting federal encroachment upon a traditional state power").

A determination by EPA or the Corps that the Clean Water Act applies to a remote, isolated, or physically disconnected wetland because there nonetheless is some sort of supposed "significant nexus" to distant navigable waters—and thus, that all construction or other development must permanently cease, and that the property must be restored to its natural state—at the very least raises the question of whether there is a regulatory taking. In fact, during the hearing in *Sackett I*, Justice Kennedy asked Petitioners' counsel whether property owners who have received Clean Water Act compliance orders "have said that there is a taking of the property"? Tr. of Oral Arg. at 57, *Sackett v. EPA*, 566 U.S. 120 (2012) (No. 10-1062).

The modern doctrine of constitutional avoidance requires that the interpretation likely to create constitutional doubt—here, the significant nexus test—be rejected in favor of the statutory construction that is unlikely to raise constitutional concerns, *i.e.*, the surface connection test.

The Court once and for all should provide the public, as well as EPA and the Army Corps of Engineers, with unambiguous and easy to apply tests for determining whether a wetland is subject to regulation under the Clean Water Act. Unlike the significant nexus test, they should be tests that raise no takings or other constitutional concerns.

## CONCLUSION

The Court should hold that the *Rapanos* plurality's surface connection test is one of the necessary and proper tests for determining whether particular wetlands are encompassed by "the waters of the United States" under the Clean Water Act.

Respectfully submitted,

LAWRENCE S. EBNER
*Counsel of Record*
ATLANTIC LEGAL FOUNDATION
1701 Pennsylvania Ave., NW
Washington, DC 20006
(202) 729-6337
lawrence.ebner@atlanticlegal.org

NANCIE G. MARZULLA
MARZULLA LAW, LLC
1150 Connecticut Ave., NW
Washington, DC 20036
(202) 822-6760
nancie@marzulla.com

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