No. 22-277

In the Supreme Court of the United States

ASHLEY MOODY, ATTORNEY GENERAL
OF FLORIDA, ET AL.,
Petitioners,
v.
NETCHOICE, LLC, DBA NETCHOICE, ET AL.,
Respondents,

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

BRIEF OF FREEDOM X AS *AMICUS CURIAE* IN SUPPORT OF PETITIONERS

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STATEMENT OF INTEREST[1]

Freedom X is a public interest law firm devoted to protecting and expanding freedom of thought, speech, and conscience. It represents speakers who challenge constraints on their political and religious expression. Freedom X and the speakers it represents are vitally interested in this case; if hosts can restrict the freedom to speak and exchange ideas, it will prevent both our clients' self-expression and the debate that is necessary for our Nation's democratic self-government.

INTRODUCTION AND SUMMARY OF ARGUMENT

Is the right to *add* speech to *contribute* to public debate matched by a coextensive right to *subtract* speech to *extinguish* it? The Eleventh Circuit held it is: "[R]emoving . . . and deprioritizing users and posts constitute 'speech' within the meaning of the First Amendment." *NetChoice, LLC v. Attorney General, Florida*, 34 F.3d 1196, 1223 (11th Cir. 2022) (*NetChoice I*). The Fifth Circuit held it is not: "We reject the Platforms' attempt to extract a freewheeling censorship right from the Constitution's free speech guarantee . . . . Their censorship is not speech." *NetChoice, LLC v. Paxton*, 49 F.4th 439, 494 (5th Cir. 2022) (*NetChoice II*). The dispute is especially consequential when two-thirds of college students

[1] No counsel for a party wrote this brief in whole or in part, and no party, counsel for a party, or anyone else made a monetary contribution intended to fund the preparation of submission of this brief. Counsel of record for all parties received timely notice of the filing of this brief and have consented to the filing.

consider it acceptable to shout down speakers to prevent their speech.[2] Amicus urges this Court to grant the writ of certiorari, and maintain the longstanding distinction between adding speech and subtracting it: "Freedom to publish is guaranteed by the Constitution, but freedom to . . . keep others from publishing is not." *Associated Press v. United States*, 326 U.S. 1, 20 (1945).

The First Amendment enables both self-expression and self-government, and this case exposes the tension between these two worthy imperatives. The self-expressive (autonomy) function enables people to decide for themselves which ideas and beliefs deserve expression, consideration, and adherence. *Turner Broad. Sys., Inc. v. FCC*, 512 U.S. 622, 641 (1994). Silence can ensure this autonomy at least as much as speech. *West Va. State Bd. of Educ. v. Barnette*, 319 U.S. 624, 634 (1943). There is also a civic function that enables the robust exchange of ideas needed for self-government. *Garrison v. Louisiana*, 379 U.S. 64, 75 (1964). Unlike the autonomy function, the civic function is not neutral between silence and speech: the civic response to falsehood "is more speech, not enforced silence." *Whitney v. California*, 274 U.S. 357, 377 (1927) (Brandeis, J. concurring); see also *United States v. Alvarez*, 567 U.S. 709, 726 (2012): "[T]he dynamics of free speech, counterspeech, of refutation, can overcome the lie." The civic preference for speech over silence explains why the government generally

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[2] College Pulse, 2021 Free Speech Rankings, https://reports.collegepulse.com/college-free-speech-rankings-2021 (College Pulse)

may participate in public debate by speaking but not by suppressing speech.

The difference between adding speech and subtracting it from public consideration renders inapt the Eleventh Circuit's citation to *Buckley v. Valeo*, 424 U.S. 1 (1976) and *Sorrell v. IMS Health, Inc.*, 564 U.S. 552 (2011), for the proposition that the state may not "level the expressive playing field." (*NetChoice I*, 34 F.4th at 1228. Whereas the *Buckley* and *Sorrell* regulations restricted speech, the instant regulation expands it. *Sorrell* expressly relied on the superiority of more speech over less: "[T]he best means to [good decisionmaking] is to open the channels of communication rather than to close them." *Sorrell*, at 578.

The past three years have proved the civic costs of speech suppression. Platforms challenging the instant legislation removed speech contradicting governmental narratives on COVID, only to see yesterday's "misinformation" become today's "current scientific thinking," and vice versa.[3] Confirming that "right conclusions are more likely to be gathered out of a multitude of tongues, than through any kind of

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[3] Purtill, *Doctors fear California law aimed at COVID-19 misinformation could do more harm than good*, (L.A. Times, Oct. 6, 2022), https://www.latimes.com/science/story/2022-10-06/spreading-lies-about-covid-19-could-get-doctors-disciplined-in-california; Sullum, *Vivek Murphy's Demand for Data on COVID 'Misinformation' Is Part of a Creepy Crusade to Suppress Dissent* (Reason, Mar. 3, 2022) https://reason.com/2022/03/03/vivek-murthys-demand-for-data-on-covid-misinformation-is-part-of-a-creepy-crusade-to-suppress-dissent/?utm_medium=email

authoritative selection" (*United States v. Associated Press*, 52 F.Supp. 362, 372 (S.D.N.Y.1943)), the absence of debate generated policies that were, in retrospect, objectively erroneous. Even where the government does not direct it, suppression does not serve the same civic function, or deserve the same protection, as affirmative speech.

The most apt precedent for balancing the competing imperatives was one absent from both *NetChoice* opinions: *Board of Regents of Univ. of Wisconsin Sys. v. Southworth,* 529 U.S. 217 (2000). Students asserted their autonomy in objecting to compelled funding of ideological speech, but this Court unanimously held that the civic imperative of fostering debate justified the compulsion; so long as the program was viewpoint-neutral, the students were essentially funding debate generally, not specific speakers.

The net value to all parties (regardless of their viewpoint) of such debate explains the briefing in this case. Petitioner (and amici) have offered speech favoring certiorari to persuade the Court to grant the writ. Respondent will offer counterspeech—rather than delete the briefs with which it disagrees. It is this process of adding speech instead of subtracting it that most deserves protection.

ARGUMENT

This Court should grant certiorari to determine whether the First Amendment equally protects adding speech to and subtracting speech from public debate.

This Court should grant certiorari for three reasons. One is the unbiquity of social media and its role as "the modern public square." *Packingham v. North Carolina*, 137 S.Ct. 1730, 1732 (2017). The second is the stark conflict between the reasoning of the Eleventh Circuit and the Fifth Circuit. Though some disparities distinguish the respective provisions, both forbid viewpoint discrimination (and prescribe disclosure) so certiorari will enable needed clarification, and the disparities will only further the Court's opportunity to clarify the boundaries of permissible internet regulation.

The third reason is the effect of the instant conflict on speech and self-government more broadly. To ensure "government may be responsive to the will of the people," the First Amendment " 'was fashioned to assure unfettered interchange of ideas for the bringing about of political and social changes desired by the people.' " *New York Times v. Sullivan*, 376 U.S. 254, 269 (1963). But the interchange has become increasingly fettered, by both Respondents' frequent "flick[s] of the switch" (*Turner*, 512 U.S. at 656), and the veto exercised by aggressive hecklers. The proportion of college students who believe it is "always or sometimes acceptable" to shout down speakers to prevent them from expressing their views has risen from 37 percent in 2017, to 51 percent in 2018, to 66

percent in 2021.[4] If our constitutional tradition favors more speech over enforced silence, this Court should say so.

The Eleventh Circuit equated the right to subtract speech from public debate with the right to add it. Both law and policy are to the contrary.

A. Adding speech serves the public interest more than subtracting it.

Speech regarding public affairs is more than self-expression, it is the "essence of self-government." *Garrison*, 379 U.S. 64, 74-75. John Milton explained the civic justification for speech: "Let [Truth] and Falsehood grapple; whoever knew Truth put to the worse in a free and open encounter?" J. Milton, Areopagitica 78, 126 (J. C. Suffolk ed. 1968). And the more grappling, the better: "The premise of our system is that there is *no such thing as too much speech*—that the people are not foolish but intelligent, and will separate the wheat from the chaff." *Austin v. Michigan Chamber of Commerce*, 494 U.S. 652, 695 (1990) (Scalia, J. dissenting) (emphasis added), overruled in *Citizens United v. FEC*, 558 U.S. 310 (2010); see also Lidsky, *Nobody's Fools: The Rational Audience as First Amendment Ideal*, 2010 U. Ill. L. Rev. 799, 810-11 (2010) [First Amendment rests on premise that audiences can rationally evaluate speech's merits and [therefore] "more speech is better than less."].

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[4] College Pulse; Daniel Burnett, Survey: Speaker shutdown gets double-digit boost in one year, (FIRE May 20, 2019), https://www.thefire.org/survey-speaker-shoutdown-support-gets-double-digit-boost-in-one-year/

The marketplace of ideas benefits from more vendors rather than fewer. "[T]he best means to [good decisionmaking] is to open the channels of communication rather than to close them." *Sorrell,* 564 U.S. 552, 578. The Eleventh Circuit cited *Sorrell* and *Buckley*, 424 U.S. 1, to reject Florida's supposed attempt to "restrict[] the speech of some . . . to enhance the relative voice of others." *NetChoice I*, 34 F.4th at 1228. But this Court should follow Justice Brandeis' wisdom in favoring "more speech" over silence, and hold there is a fundamental difference between the State's restricting speech by subtracting it, as in *Sorrell* and *Buckley*, and "restricting" it by enabling it, as here.

This Court has upheld the right to speak even on property whose owners oppose hosting it. First Amendment rights are so fundamental—for both the speaker and the audience—that they could not be denied simply because a company owned the public square. *Marsh v. Alabama*, 326 U.S. 501 (1946). The *Marsh* court left no doubt that speaking fulfills a civic function that removing speech does not.

> Just as all other citizens [residents] must make decisions which affect the welfare of community and nation. To act as good citizens they must be informed. In order to enable them to be properly informed their information must be uncensored.

Id. at 508.[5]

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[5] Though *Marsh* could not have anticipated the "information superhighway" that would develop generations later, its analysis would support freedom of navigation on it: "[N]o one would have

A property owner's unwillingness to host speech again yielded to speech in *Pruneyard Shopping Ctr. v. Robins*, 447 U.S. 74 (1980). Because publicly accessible shopping centers can provide "an essential and invaluable forum" for exchanging ideas, the California Supreme Court had held "the public interest in peaceful speech outweighs the desire of property owners" to prevent the speech. *Robins v. Pruneyard Shopping Ctr.*, 592 P.2d 341, 347 (Cal. 1979). This Court rejected an asserted right to exclude the unwanted speech; in contrast to *Wooley v. Maynard*, 430 U.S. 705 (1977), the speech would not be associated with the host, who could further disavow any connection. *PruneYard*, 447 U.S. 74, 87. More importantly, the law did not prescribe the display of any particular message; the forum was open to all comers. *Id.* This content-neutrality avoided the "penalty" that would "dampe[n] . . . public debate" in *Miami Herald Pub. Co. v. Tornillo*, 418 U.S. 241 (1974).

Miami Herald (and *Pacific Gas & Electric v. Public Utilities Comm'n*, 475 U.S. 1 (1986)) confirmed a structural preference for more speech rather than less. The right-of-reply provision in *Miami Herald* would not generate more speech; due to finite space and the cost of printing a newspaper, the candidate's reply would simply replace the speech the paper wished to make. "[I]f a newspaper is forced to publish a particular item, it must as a practical matter, omit something else." *Miami Herald*, 418 U.S. 241, 257 n.22. The same was

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seriously contended that the corporation's property interest in the highway gave it power to obstruct through traffic or to discriminate against interstate commerce." *Id.* at 506.

true in *PG&E*: "By appropriating . . . the space in appellant's envelope that appellant would otherwise use for its own speech, the State has necessarily curtailed appellant's use of its own forum." *PG&E* at 24 (Marshall, J. concurring). The subtracted speech would offset the added speech.

In fact, the provisions would result in *less* net speech. Neither provision offered open, viewpoint-neutral access for all comers (as S.B. 7072 prescribes), but instead enforced access for one particular speaker—*due to that speaker's viewpoint* (opposing the host newspaper/utility). Burdening the newspaper's speech by compelling access for contradiction operated as a penalty. *Miami Herald*, 418 U.S. at 257. This could deter the paper from presenting controversial positions, "thereby *reducing* the free flow of information and ideas that the First Amendment seeks to promote." *PG&E*, 475 U.S. at 14 (emphasis added), citing *Miami Herald*, at 257.

This Court later distinguished the provisions in *Miami Herald* and *PG&E* from those in *Turner* because the former imposed a "content-based penalty," whereas content was immaterial to access in *Turner*. *Turner*, 512 U.S. 622, 655. More importantly, *Turner* expressed a broader distinction between newspaper and cable television. Unlike newspapers, which cannot "obstruct readers' access to other competing publications," cable operators exercised "bottleneck, or gatekeeper control," and could thereby "prevent its subscribers from obtaining access to programming it chooses to exclude." *Id*. at 656. The special danger was the subtraction of speech: Cable operators could "silence the voice of

competing speakers with a mere flick of a switch." *Id*. A generation later, respondents' silencing capacity is far greater.

Congress (or a state legislature) could constitutionally prevent this subtraction.

> The First Amendment's command that government not impede the freedom of speech does not disable the government from taking steps to ensure that private interests not restrict, through physical control of a critical pathway of communication, the free flow of information and ideas.

Turner, 512 U.S. at 657.

Though cable operators had the right to speak, they did not enjoy a corollary right to "restrict" others' expression. From sidewalks to shopping malls, from cable television to cyberspace, this principle remains the same.

A preference for speaking over suppression is necessary to preserve popular self-government. The disproportionate influence of corporate gatekeepers is far more dangerous to democratic decisionmaking when it removes speech than when it adds it. Though wealthy corporations may spend more than ordinary citizens on public advertising to influence policymaking and elections, no matter how much they spend, their speech will be effective "only to the extent that it brings to the people's attention ideas which . . . strike them as true." *Austin*, 494 U.S. 652, 684 (Scalia, J., dissenting). Voters remain the critical decisionmakers; the very reason for political advertising is that voters possess

the "ultimate influence" in our democracy. *Citizens United*, 558 U.S. at 360. Speech therefore engages voters and furthers democracy, even if not all participants have an equal-sized voice in the debate.

But when a handful of tech CEO's conspire to suppress speech, there is no debate at all.

B. The instant case more closely resembles the viewpoint-neutral access in *PruneYard* and *Marsh* than the content-based access in *Miami Herald* and *PG&E*.

The Eleventh Circuit held Respondents had a right to restrict others' expression through the exercise of their "editorial discretion." *NetChoice I*, 34 F.4th 1196, 1210-1211. The court cited *Miami Herald* and *PG&E,* but S.B. 7072, like its Texas counterpart, more closely resembles the speech-expanding, viewpoint-neutral access rules that were upheld in *PruneYard* (and *Marsh*) than the speech-reducing, content-based access rules that were struck down in *Miami Herald* and *PG&E*.

Reason for hosting. A major distinction concerns why the would-be speakers have access to the host's property. "The more an owner, *for his advantage*, opens up his property for use by the public in general, the more do his rights become circumscribed by the statutory and constitutional rights of those who use it." *Marsh*, 326 U.S. 501, 506 (emphasis added). The community shopping center in *Marsh* was freely accessible and open to the people in the area and those passing through, just as the *PruneYard* mall was "open to the public to come and go as they please[d]."

PruneYard, 447 U.S. 74, 87; *Marsh*, at 508. Visitors were welcomed because their presence served their hosts' economic self-interest. By contrast, neither the newspaper in *Miami Herald* nor the billing envelope in *PG&E* was open to the public. As Justice Marshall explained, unlike the *PruneYard* mall, where people "routinely gathered . . . at the owner's invitation, and engaged in a wide variety of activities," the utility "issued no invitation to the general public to use its billing envelope for speech or for any other purpose." See *PG&E*, 475 U.S. 1, 23 (Marshall, J. concurring).

Respondents clearly fall on the *PruneYard/Marsh* side of the line, not the *Miami Herald/PG&E* side. In fact, they do more than open their site to visitors, they design them to be addictive. Gripenstraw, *Our Social Media Addiction*, (Harv. Bus. Rev. (Nov.-Dec. 2022), https://hbr.org/2022/11/our-social-media-addiction. It is as if the *PruneYard* mall gave everyone free snacks to maximize the time they spent on the premises.

Means of transmission. The hosts in *Marsh* and *PruneYard* played no role in transmitting the speech; the company did nothing to transmit the speaker's religious literature, nor did the mall assist the speakers in distributing their pamphlets. But the newspaper in *Miami Herald* had to insert the replying candidate's text into their publication, print those words, and distribute them to readers. Likewise, the utility in *PG&E* needed to insert their opponent's message into the billing envelopes and distribute them to all the company's customers.

Respondents' role in presenting the speakers' messages more closely resembles that of the *Marsh* and

PruneYard hosts. Speakers directly post their own content, usually without the host's conscious awareness; more than 99 percent of material is never reviewed by human eyes and is essentially "invisible to the [Platform]." *NetChoice II*, 49 F.4th 439, 459. Whereas the provision in *PG&E* "compel[led] Pacific to mail messages," respondents need not take any action at all. *PG&E*, 475 U.S. at 21 (Burger, C.J., concurring).

Imprimatur. Because the mall was open to many visitors, including (but not limited to) speakers, their speech would "not likely be identified with those of the owner." *PruneYard*, 447 U.S. at 87. Identification was more likely in *Miami Herald*; even if the replying editorial was published only due to the statutory command (and included a disclaimer to that effect), a reader might remember the article's appearance (but not the disclaimer) weeks later, and conclude the editorial must have had some validity due to its appearance in a publication to which the reader subscribed. See Volokh, *Treating Social Media Platforms Like Common Carriers*, 1 J. Free Speech L. 377, 380 (2021): "People read the *Times* in part precisely because they trust its editorial judgment— they believe its editors will winnow the good and sensible views out of the vast mass of nonsense and folly." Respondents do not convey the same imprimatur: "Who thinks, 'Oh, that's probably a credible argument, because someone shared it on Facebook'?" *Id*. at 385 n. 22.

Reason for speaker's access. The most important distinction concerns the reason for why the specific speech appeared. In *PruneYard* and *Marsh* (and the instant cases), access was available to all; the

compelled access did not favor or oppose any viewpoint. Even the *Turner* dissent (which opposed that compulsory access provision) accepted that Congress could compel cable companies to operate as common carriers because "such an approach would not suffer from the defect of preferring one speaker to another." *Turner*, 512 U.S. at 685 (O'Connor, dissenting). But *Miami Herald* and *PG&E* involved such preference; only one speaker was selected, and that selection was precisely *because the speaker opposed the host's own view*. See *PG&E*, 475 U.S. at 14: "[A]ccess is awarded only to those who disagree with appellant's views and who are hostile to appellant's interests." As noted, this penalized the hosts and could "reduc[e] the free flow of information and ideas." *Id*.

S.B. 7072 does not single out any speaker for compelled access, let alone an opponent for the purpose of presenting an opposing view. Though the Eleventh Circuit highlighted the signing statement that described the measure as protecting speakers against "radical leftist" censorship (*NetChoice I*, 34 F.4th at 1205), the law is viewpoint-neutral, protecting access without regard for the speaker's viewpoint as in *PruneYard* and *Marsh* but not *Miami Herald* or *PG&E*. It therefore does not substantially infringe the host's autonomy as in *Barnette* or *Wooley*—nor will it penalize speech and thereby lead to its reduction.

C. Viewpoint neutrality enables speech without unduly burdening hosts' autonomy.

Though neither the Eleventh nor Fifth Circuit cited it, *Southworth*, 529 U.S. 217, could be the most apposite precedent in balancing the civic imperative that favors speech and the autonomy imperative that (might) oppose compelled support for that speech. The student plaintiffs in *Southworth* opposed having to enable speakers with whom they disagreed through compulsory funding. *Id*. at 221. Following Thomas Jefferson's dictum that "to compel a man to furnish contributions of money for the propagation of opinions which he disbelieves, is sinful and tyrannical," this objection had long blocked even indirect funding of religious activity. *Rosenberger v. Rector and Visitors of Univ. of Va.*, 515 U.S. 819, 871 (1995). But *Southworth* unanimously favored Milton's civic imperative over Jefferson's autonomy imperative; the "purpose of facilitating the free and open exchange of ideas" was so important that it justified the unwanted sponsorship. *Id*. at 229.

Nevertheless, the students deserved "some protection" from the forced subsidy. *Southworth*, 529 U.S. at 231. The infringement on autonomy could be justified through viewpoint neutrality, which would ensure the program's integrity. *Id*. at 233. "When a university requires its students to pay fees to support the extracurricular speech of other students, all in the interest of open discussion, it may not prefer some viewpoints to others." *Id*. This distinguishes the Florida

(and Texas) provisions from those struck down in *Miami Herald* and *PG&E*.

Just three months after deciding *Southworth*, the Court clarified that "neutral eligibility criteria" also shapes Establishment Clause analysis. *Mitchell v. Helms*, 530 U.S. 793, 810 (2000). Viewpoint neutrality justified distributing materials to the "religious, irreligious, and areligious" on an equal basis. *Id.* Because funding followed the "principle of neutrality," the relevant autonomy was that of the parent choosing the school, not the government, just as the relevant autonomy here is exercised by the parties posting (and consuming) the content, not the website hosting it.

D. Suppressing speech distorts debate and undermines public policy.

It is especially necessary to the review (and reject) a nascent constitutional right to censor because Respondents (and government officials) are especially eager to exercise one—with potentially calamitous consequences for public policy.

Respondents are rejecting the traditional "marketplace of ideas" model on the ground that its products are just too dangerous for personal consumption. In the early days of the pandemic, YouTube adopted a policy of forbidding any speech contradicting the World Health Organization, even though the WHO itself had erroneously informed the public into early 2020 that there was no clear evidence

of human-to-human transmission of coronavirus.[6] Similarly, when leading scientists from Stanford, Harvard, and Oxford promoted the Great Barrington Declaration, favoring narrower restrictions, Facebook censored mention of the document, at the urging of governmental officials.[7] As Justice Brandeis would have predicted, censorship of speech questioning the prevailing COVID orthodoxy led to policies producing far more harm than otherwise would have occurred.[8]

"Misinformation" is not the only ground prompting censorship, and thereby distorting debate. Twitter suspended the account of a woman whose son had been killed by a man in the United States illegally (and who had failed to appear for his sentencing hearing on a prior conviction) unless she deleted, "@Kamala Harris[,] What law can I break and have you defend me

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[6] Sanchez, *YouTube to Ban Content That Contradicts WHO on COVID-19, Despite the UN Agency's Catastrophic Track Record of Misinformation (Foundation for Economic Education*, (Apr. 23, 2020), https://fee.org/articles/youtube-to-ban-content-that-contradicts-who-on-covid-19-despite-the-un-agency-s-catastrophic-track-record-of-misinformation/

[7] The Editorial Board, *How Fauci and Collins Shut Down Covid Debate* (Wall St. J., (Dec. 21, 2021), https://www.wsj.com/articles/fauci-collins-emails-great-barrington-declaration-covid-pandemic-lockdown-11640129116

[8] See e.g. Yanovskiy & Socol, *Are Lockdowns Effective in Managing Pandemics*?, 2022 Jul 29;19(15):9295. doi: 10.3390/ijerph19159295. PMID: 35954650; PMCID: PMC9368251; Knapton, "*Wildly incorrect' Covid modelling bounced Boris Johnson into second lockdown, MPs told*, (The Telegraph, Jan. 18, 2022), https://www.telegraph.co.uk/politics/2022/01/18/wildly-incorrect-covid-modelling-caused-boris-johnson-bounce/

so staunchly? Provide me sanctuary from our laws?"[9] Even though the tweet actually criticized a then-United States Senator, Twitter claimed it needed to suppress the speech to enforce its "hate speech" provisions, designed to protect vulnerable populations. Looser immigration (and bail) policies offer benefits and costs, but if the public hears only the former, it distorts the process of self-government, and the resulting laws we enact. Truth cannot outgrapple Falsehood with one hand tied behind its back.

CONCLUSION

This Court should address the conflicting positions of the Eleventh and Fifth Circuits. The Fifth Circuit's favoring "more speech' over "enforced silence" enables all citizens to participate in self-government. By contrast, the Eleventh Circuit's equating *suppressing* ideas with *expressing* them enables corporate gatekeepers to extinguish debate on any subject they choose. This Court has long recognized viewpoint neutrality sufficiently addresses unwilling hosts' legitimate autonomy concerns, while enabling the debate needed to ensure Truth can prevail over Falsehood. This Court should grant the writ of certiorari.

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[9] Nieto, *Twitter Suspends Angel Mom's Account For Criticizing Kamala Harris*, The Daily Caller, July 20, 2019 https://dailycaller.com/2019/07/20/twitter-suspends-angel-mom-kamala-harris/

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