No. 23-402

In the

Supreme Court of the United States

STATE OF OKLAHOMA, *ET AL.*,
Petitioners,

v.

UNITED STATES OF AMERICA, *ET AL.*,
Respondents.

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

BRIEF OF *AMICUS CURIAE* CLAREMONT INSTITUTE'S CENTER FOR CONSTITUTIONAL JURISPRUDENCE IN SUPPORT OF PETITIONERS

JOHN C. EASTMAN
ANTHONY T. CASO
Counsel of Record
Constitutional Counsel Group
1628 N. Main St. #289
Salinas, CA 93906
(916) 601-1916
atcaso@ccg1776.com

Counsel for Amicus Curiae

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INTEREST OF AMICUS CURIAE[1]

The Center for Constitutional Jurisprudence is the public interest law arm of the Claremont Institute, whose stated mission is to restore the principles of the American founding to their rightful and preeminent authority in our national life, including the principle that structural provisions of the Constitution must be upheld in order to protect individual liberty. The Center has previously appeared before this Court as *amicus curiae* in several cases addressing these issues, including *Loper Bright v. Raimondo*, No. 22-451 (2023); *Sackett v. EPA*, 598 U.S. 651 (2023); *West Virginia v. EPA*, 142 S.Ct. 2587 (2022); *National Federation of Independent Business v. Sebelius*, 567 U.S. 519 (2012); *Department of Transportation v. Association of American Railroads*, 575 U.S. 43 (2015); and *Perez v. Mortgage Bankers Ass'n*, 575 U.S. 92 (2015), to name a few.

SUMMARY OF ARGUMENT

Congress has vested a private association with the power to make federal law. If the nondelegation doctrine means anything, it forbids Congress from delegating its exclusive lawmaking power to a nongovernmental entity.

But the subject of this lawmaking power is also concerning. In the law for which review is sought, Congress vested federal power in a private organization to regulate horse racing. These races take place

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[1] In accordance with Rule 37.2, counsel gave notice of the intent to file this brief more than 10 days prior to filing and in accordance with Rule 37.6, counsel affirms that no counsel for any party authored this brief in whole or in part and that no person or entity other than *amicus* made a monetary contribution to fund the preparation and submission of this brief.

at tracks located entirely within the boundaries of individual states. These tracks do not move in interstate commerce; indeed, they do not move at all. As the court below noted, the federal legislation displaced regulations enacted by individual states under their police power authority. It is the states (through the sovereign people), not the federal government, that are vested with the authority to regulate for health, safety, and welfare. It is irrelevant that a private organization or even Congress disagrees with how the states have exercised that power.

The petition seeks review of the unconstitutional delegation of federal lawmaking power. The Court should grant review of that question. But this Court should also grant review on the more fundamental question of whether the subject matter of the legislation was within the purview of Congress. The safety of the jockeys and the horses are undoubtedly important matters, but they are matters within the police power of the states. There is no national police power.

The original understanding of the Constitution holds that the Commerce Clause only authorizes Congress to regulate commerce between the states. This case provides the Court a vehicle for the necessary refashioning of a coherent Commerce Clause test that does not "'obliterate the distinction between what is national and what is local and create a completely centralized government.'" *See United States v. Lopez*, 514 U.S. 549, 585 (1995) (Thomas, J., concurring).

ARGUMENT

I. The Federal Government is One of Only Limited, Enumerated Powers.

When the Framers of our Constitution met in Philadelphia in 1787, it was widely acknowledged that a stronger national government than existed under the Articles of Confederation was necessary if the new nation was going to survive. The Continental Congress could not honor its commitments under the Treaty of Paris; it could not meet its financial obligations; it could not counteract the crippling trade barriers that were being enacted by the several states against each other; and it could not even ensure that its citizens, especially those living on the western frontier, were secure in their lives and property. *See*, *e.g.*, Letter from Tench Coxe to the Virginia Commissioners at Annapolis (Sept. 13, 1786), *reprinted in* 3 The Founders' Constitution 473-74 (P. Kurland & R. Lerner eds., 1987) (noting that duties imposed by the states upon each other were "as great in many instances as those imposed on foreign Articles"); The Federalist No. 22 at 144-45 (Hamilton) (C. Rossiter, ed., 1961) (referring to "[t]he interfering and unneighborly regulations in some States," which were "serious sources of animosity and discord" between the States); *New York v. United States*, 505 U.S. 144, 158 (1992) ("The defect of power in the existing Confederacy to regulate the commerce between its several members [has] been clearly pointed out by experience") (quoting The Federalist No. 42 at 267 (Madison)).

But the Framers were equally cognizant of the fact that the deficiencies of the Articles of Confederation existed by design, due to a genuine and almost universal fear of a strong, centralized government. *See*, *e.g.*,

Bartkus v. *People of State of Illinois,* 359 U.S. 121, 137 (1959) ("the men who wrote the Constitution as well as the citizens of the member States of the Confederation were fearful of the power of centralized government and sought to limit its power"); *Garcia* v. *San Antonio Metropolitan Transportation Authority*, 469 U.S. 528, 568-69 (1985) (Powell, J., dissenting, joined by Chief Justice Burger and Justices Rehnquist and O'Connor). Our forebears had not successfully prosecuted the war against the King's tyranny merely to erect in its place another form of tyranny.

The central problem faced by the convention delegates, therefore, was to create a government strong enough to meet the threats to the safety and happiness of the people, yet not so strong as to itself become a threat to the people's liberty. *See* The Federalist No. 51 at 322 (Madison). The Framers drew on the best political theorists of human history to craft a government that was most conducive to that end. The idea of separation of powers, for example, evident in the very structure of the Constitution, was drawn from Montesquieu, out of recognition that the "accumulation of all powers, legislative, executive, and judiciary, in the same hands . . . may justly be pronounced the very definition of tyranny." The Federalist No. 47 at 301 (Madison).

But the Framers added their own contribution to the science of politics as well. In what can only be described as a radical break with past practice, the Founders rejected the idea that the government was sovereign and indivisible. Instead, the Founders acknowledged that the people themselves were the ultimate sovereign, *see*, *e.g.*, James Wilson, Speech at the Pennsylvania Ratifying Convention (Nov. 26,

1787), *reprinted in* 2 J. Wilson, The Works of James Wilson 770 (R. McCloskey ed., 1967), and could delegate all or part of their sovereign powers, to a single government or to multiple governments, as, in their view, was "most likely to effect their Safety and Happiness," Declaration of Independence, ¶ 2 (1 Stat. 1).

As a result, it became and remains one of the most fundamental tenets of our constitutional system of government that the sovereign people delegated to the national government only certain, enumerated powers, leaving the residuum of power to be exercised by the state governments or by the people themselves. *See*, *e.g.*, The Federalist No. 39 at 256 (Madison) (noting that the jurisdiction of the federal government "extends to certain enumerated objects only, and leaves to the several States a residuary and inviolable sovereignty over all other objects"); The Federalist No. 45 at 292-93 (Madison) ("The powers delegated by the proposed Constitution to the federal government are few and defined. Those which are to remain in the State governments are numerous and indefinite"); The Federalist No. 84 at 513 (Hamilton) (noting that the Constitution provided the structure to "merely . . . regulate the general political interests of the nation," not to regulate "every species of personal and private concerns"); *M'Culloch* v. *Maryland*, 17 U.S. (4 Wheat.) 316, 421 (1819) (Marshall, C.J.) ("We admit, as all must admit, that the powers of the government are limited and that its limits are not to be transcended"); *Gregory v. Ashcroft*, 501 U.S. 452, 457 (1991) ("The Constitution created a Federal Government of limited powers").

This division of sovereign powers between the two great levels of government was not simply a constitutional add-on, by way of the Tenth Amendment. *See* U.S. CONST. AMEND. X ("The powers not delegated to the United States by the Constitution, nor prohibited by it to the States, are reserved to the States respectively, or to the people"). Rather, it is inherent in the doctrine of enumerated powers embodied in the main body of the Constitution itself. *See* U.S. CONST. ART. I, SEC. 1 ("All legislative Powers *herein granted* shall be vested in a Congress of the United States" (emphasis added)); U.S. CONST. ART. I, SEC. 8 (enumerating powers so granted); *see also M'Culloch*, 17 U.S. (4 Wheat.) at 405 ("This government is acknowledged by all, to be one of enumerated powers. The principle, that it can exercise only the powers granted to it, . . . is now universally admitted"); *Lopez*, 514 U.S. at 552 ("We start with first principles. The Constitution creates a Federal Government of enumerated powers").

Moreover, the constitutionally-mandated division of the people's sovereign powers between federal and state governments was not designed to protect state governments as an end in itself, but rather "was adopted by the Framers to ensure protection of our fundamental liberties." *Lopez*, 514 U.S. at 552 (quoting *Gregory*, 501 U.S. at 458); *see also United States v. Morrison*, 529 U.S. 598, 616 n.7 (2000), ("As we have repeatedly noted, the Framers crafted the federal system of government so that the people' rights would be secured by the division of power" (citing *Arizona* v. *Evans*, 514 U.S. 1, 30 (1995) (Ginsburg, J., dissenting); *Gregory*, 501 U.S. at 458-59; *Atascadero State Hospital* v. *Scanlin*, 473 U.S. 234, 242 (1985) (quoting *Garcia*, 469 U.S. at 572 (Powell, J., dissenting))); *Garcia*,

469 U.S. at 582 (O'Connor, J., dissenting) ("This division of authority, according to Madison, would produce efficient government and protect the rights of the people") (citing The Federalist No. 51, at 350-51 (Madison)). "Just as the separation and independence of the coordinate branches of the Federal Government serve to prevent the accumulation of excessive power in any one branch, a healthy balance of power between the States and the Federal Government will reduce the risk of tyranny and abuse from either front." *Lopez*, 514 U.S. at 582 (quoting *Gregory*, 501 U.S. at 458); *Gregory*, 501 U.S. at 459 (quoting The Federalist No. 28, at 180-81 (Hamilton)); *id.* (quoting The Federalist No. 51, at 323 (Madison)); *see also Garcia*, 469 U.S. at 581 (O'Connor, J., dissenting) ("[The Framers] envisioned a republic whose vitality was assured by the diffusion of power not only among the branches of the Federal Government, but also between the Federal Government and the States" (citing *FERC* v. *Mississippi*, 456 U.S. 742, 790 (1982) (O'Connor, J., dissenting)); *id.* at 571 (Powell, J., dissenting) ("The Framers believed that the separate sphere of sovereignty reserved to the States would ensure that the States would serve as an effective 'counterpoise' to the power of the Federal Government").

When Congress acts beyond the scope of its enumerated powers, therefore, it does more than simply intrude upon the sovereign powers of the states; it acts without constitutional authority, that is, tyrannically, and places our individual liberties at risk. *See, e.g.,* The Federalist No. 33, at 204 (Hamilton) (noting that laws enacted by the Federal Government "which are *not pursuant* to its constitutional powers, but which are invasions of the residuary authorities of the

smaller societies . . . will be merely acts of usurpation, and will deserve to be treated as such").

II. The Commerce Clause Was Not Meant to Displace the Police Power of States to Make Laws for the General Health, Safety, and Welfare.

The Commerce Clause was never intended to vest a "police power" in Congress. This Court has rejected, for example, any interpretation of that clause that "would effectually obliterate the distinction between what is national and what is local and create a completely centralized government." *NLRB v. Jones & Laughlin Steel Corp.*, 301 U.S. 1, 37 (1937) (quoted in *Lopez*, 514 U.S. at 557; *Morrison*, 529 U.S., at 608). It has resisted interpretations that would "convert" the carefully delineated powers of the federal government into "a general police power," *Lopez*, 514 U.S. at 567, which under our Constitution is reserved to the states or to the people, U.S. Const. Amend. X; *Lopez*, 514 U.S. at 618. As Justice Thomas noted in his concurring opinion in *Lopez*, the Court "always ha[s] rejected readings of the Commerce Clause and the scope of federal power that would permit Congress to exercise a police power." *Id.* at 584 (Thomas, J., concurring). "The Constitution . . . still allocates a general 'police power . . . to the States and the States alone.'" *McDonald v. City of Chicago*, 561 U.S. 742, 867 (2010) (Stevens, J., dissenting) (*quoting United States v. Comstock*, 560 U.S. 126, 153 (2010) (Kennedy, J., concurring in judgment)); *see also Comstock*, 560 U.S. at 148 (upholding statute permitting civil commitment of sexually dangerous federal prisoners upon release from federal prison only after confirming that its holding would not "confer on Congress a general 'police

power, which the Founders denied the National Government and reposed in the States.'" (quoting *Morrison*, 529 U.S. at 618)). "[T]he principle that '"[t]he Constitution created a Federal Government of limited powers,"' while reserving a generalized police power to the States, is deeply ingrained in our constitutional history." *Morrison*, 529 U.S. at 618 n.8 (2000) (quoting *New York*, 505 U.S. at 155 (quoting in turn *Gregory*, 501 U.S., at 457)).

Indeed, the police power—that power to regulate the *health*, safety, and morals of the people—is foremost among the powers <u>not</u> delegated to the federal government. *See, e.g.,* The Federalist No. 45, at 292-93 (Madison) ("The powers reserved to the several States will extend to all the objects which, in the ordinary course of affairs, concern the lives, liberties, and properties of the people, and the internal order, improvement, and prosperity of the State"); *Gibbons*, 22 U.S. at 203 ("No direct general power over these objects is granted to Congress; and, consequently, they remain subject to State legislation"); *United States* v. *E. C. Knight Co.*, 156 U.S. 1, 11 (1895) ("It cannot be denied that the power of a state to protect the lives, health, and property of its citizens, and to preserve good order and the public morals, 'the power to govern men and things within the limits of its dominion,' is a power originally and always belonging to the states, not surrendered by them to the general government"). Moreover, the asserted power at issue in this case—purportedly providing for the "health" (or safety) of jockeys and racehorses—is the first item frequently mentioned by the courts in their definition of the "police power" reserved to the states or to the people. *See, e.g.*, *Gonzales v. Oregon*, 546 U.S. 243, 270 (2006); *Penn Cent. Transp. Co. v. City of New York*, 438 U.S.

104, 125 (1978); *Poe v. Ullman*, 367 U.S. 497, 539 (1961); *Lochner v. New York*, 198 U.S. 45, 53 (1905); *Mugler v. Kansas*, 123 U.S. 623 (1887); *The License Cases*, 46 U.S. (5. How) 504, 583 (1847).

As originally conceived, Congress's power under the Commerce Clause was limited to the regulation of interstate trade. *See*, *e.g.*, *Corfield* v. *Coryell*, 6 F. Cas. 546, 550 (C.C.E.D.Pa. 1823) (Washington, J., on circuit) ("Commerce with foreign nations, and among the several states, can mean nothing more than intercourse with those nations, and among those states, for purposes of trade, be the object of the trade what it may"); *Lopez*, 514 U.S. at 585 (Thomas, J., concurring) ("At the time the original Constitution was ratified, "commerce" consisted of selling, buying, and bartering, as well as transporting for these purposes"). Indeed, in the first major case arising under the clause to reach the Supreme Court, it was contested whether the Commerce Clause even extended so far as to include "navigation." Chief Justice Marshall, for the Court, held that it did, but even under his definition, "commerce" was limited to "intercourse between nations, and parts of nations, in all its branches." *Gibbons* v. *Ogden*, 22 U.S. (9 Wheat.) 1, 190 (1824); *see also Corfield,* 6 F. CAS., at 550 ("Commerce . . . among the several states . . . must include all the means by which it can be carried on, [including] . . . passage over land through the states, where such passage becomes necessary to the commercial intercourse between the states").

The *Gibbons* Court specifically rejected the notion "that [commerce among the states] comprehend[s] that commerce, which is completely internal, which is

carried on between man and man in a State, or between different parts of the same State, and which does not extend to or affect other States." *Gibbons*, 22 U.S. at 194 (quoted in *Morrison*, 529 U.S. at 616 n.7). The notion that the power to regulate commerce among the states included the power to regulate a wholly intrastate commercial event, such as a horse race, would have been completely foreign to them.

This originally narrow understanding of the Commerce Clause continued for nearly a century and a half. Manufacturing was not included in the definition of commerce, held the Court in *E.C. Knight*, 156 U.S., at 12, because "Commerce succeeds to manufacture, and is not a part of it." "The fact that an article is manufactured for export to another State does not of itself make it an article of interstate commerce . . .." *Id*. at 13; *see also Kidd* v. *Pearson*, 128 U.S. 1, 20 (1888) (upholding a state ban on the manufacture of liquor, even though much of the liquor so banned was destined for interstate commerce). Neither were retail sales included in the definition of "commerce." *See The License Cases*, 46 U.S. (5 How.) 504 (1847) (upholding state ban on retail sales of liquor, as not subject to Congress's power to regulate interstate commerce); *see also A.L.A. Schecter Poultry Corp.* v. *United States*, 295 U.S. 495, 542, 547 (1935) (invalidating federal law regulating in-state retail sales of poultry that originated out-of-state and fixing the hours and wages of the intrastate employees because the activity related only indirectly to commerce).

For the Founders and for the Courts which decided these cases, regulation of such activities as retail sales, manufacturing, and agriculture was part of the police powers reserved to the States, not part of the

power over commerce delegated to Congress. *See*, *e.g.*, *E.C. Knight*, 156 U.S. at 12 ("That which belongs to commerce is within the jurisdiction of the United States, but that which does not belong to commerce is within the jurisdiction of the police power of the State") (citing *Gibbons,* 22 U.S. at 210; *Brown* v. *Maryland*, 25 U.S. (12 Wheat.) 419, 448 (1827); *The License Cases*, 46 U.S. (5 How.) at 599; *Mobile Co.* v. *Kimball*, 102 U.S. 691 (1880); *Bowman* v. *Railway Co.*, 125 U.S. 465 (1888); *Leisy* v. *Hardin*, 135 U.S. 100 (1890); *In re Rahrer*, 140 U.S. 545, 555 (1891)); *Baldwin* v. *Fish and Game Comm'n of Mont.*, 436 U.S. 371 (1978). And, as this Court noted in *E.C. Knight*, it is essential to the preservation of the states and therefore to liberty that the line between the two powers be retained. *E.C. Knight*, 156 U.S. at 13; *see also Carter Coal*, 298 U.S. at 301 (quoting *E.C. Knight*); *Garcia*, 469 U.S. at 572 (Powell, J., dissenting, joined by Chief Justice Burger and Justices Rehnquist and O'Connor) ("federal overreaching under the Commerce Clause undermines the constitutionally mandated balance of power between the States and the Federal Government, a balance designed to protect our fundamental liberties").

This line between what belongs to state regulation and what belongs to federal regulation is blurred by the "substantial effects" test for Commerce Clause jurisdiction. This notion was introduced into constitutional jurisprudence in *Wickard v. Filburn*, 317 U.S. 111 (1942). There this Court held the federal government could regulate the noncommercial activity of a farmer growing wheat for his own consumption because, if aggregated with the actions of other individuals, it could have a substantial effect on interstate commerce. *Id*. at 114-15. As Justice Thomas has

noted, however, this test is "inconsistent with the original understanding of Congress' powers." *Morrison*, 529 U.S. at 627 (Thomas, J., concurring). That test first expands Congress's power under the Commerce Clause to any commercial activity with no requirement that the activity take place "among the several states." It then invites confusion as to whether the courts should look to whether the regulation substantially affects interstate commerce or whether the regulated activity has such an impact. *Rancho Viejo, LLC v. Norton*, 334 F.3d 1158, 1160 (D.C. Cir. 2003) (Roberts, J., dissenting from denial of rehearing en banc).

This Court's Commerce Clause jurisprudence has "significantly departed from the original meaning of the Constitution." *Sackett*, 598 U.S. at 708 (Thomas, J., concurring). This case presents the opportunity for the Court to correct this departure and return to the original understanding "commerce … among the several states."

CONCLUSION

The Constitution does not permit the delegation of federal lawmaking power to private actors, and the Court should grant review on that question as presented in the petition. The Court should also grant review on the more fundamental question of whether the law was even within the purview of the lawmaking powers of Congress. The Commerce Clause does not grant a "police power" to the federal government. Review by this Court is necessary to reinforce the structural limits on the lawmaking power of Congress.

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Respectfully submitted,

JOHN C. EASTMAN
ANTHONY T. CASO
Counsel of Record
Constitutional Counsel Group
1628 N. Main St. #289
Salinas, CA 93906
(916) 601-1916
atcaso@ccg1776.com

Counsel for Amicus Curiae