

IN THE SUPREME COURT OF THE UNITED STATES

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ISMAEL MOISES HAYNES, PETITIONER

v.

UNITED STATES OF AMERICA

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ON PETITION FOR A WRIT OF CERTIORARI  
TO THE UNITED STATES COURT OF APPEALS  
FOR THE FIFTH CIRCUIT

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MEMORANDUM FOR THE UNITED STATES IN OPPOSITION

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No. 24-6794

ISMAEL MOISES HAYNES, PETITIONER

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Petitioner contends (Pet. 10-27) that 18 U.S.C. 922(g)(1), the federal statute that prohibits a person from possessing a firearm if he has been convicted of “a crime punishable by imprisonment for a term exceeding one year,” ibid., violates the Second Amendment on its face. See Pet. 2, 10 (describing petitioner’s challenge as facial); Pet. App. 2 (discussing petitioner’s “facial challenge” to Section 922(g)(1)). For the reasons set out in the government’s brief in opposition in French v. United States, No. 24-6623 (filed Apr. 11, 2025), that contention does not warrant this Court’s review. As the government explained in French, the claim that Section 922(g)(1) violates the

Second Amendment on its face plainly lacks merit, and every court of appeals to consider the issue since United States v. Rahimi, 602 U.S. 680 (2024), has determined that the statute has at least some valid applications.

The petition for a writ of certiorari should be denied.\*

Respectfully submitted.

D. JOHN SAUER  
Solicitor General

APRIL 2025

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\* A copy of the government's brief in opposition in French is being served on petitioner. The government waives any further response to the petition for a writ of certiorari unless this Court requests otherwise.