No. 18-725

IN THE

Supreme Court of the United States

ANDRE MARTELLO BARTON,
Petitioner,

v.

WILLIAM P. BARR, ATTORNEY GENERAL,
Respondent.

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

BRIEF OF CAPITAL AREA IMMIGRANTS' RIGHTS COALITION AS *AMICUS CURIAE* IN SUPPORT OF PETITIONER

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INTEREST OF *AMICUS CURIAE*

Amicus curiae Capital Area Immigrants' Rights Coalition (CAIR Coalition) is a nonprofit legal-services organization. CAIR Coalition is the only organization dedicated to providing legal services to adults and children detained and facing removal proceedings throughout Virginia and Maryland. CAIR Coalition provides legal rights presentations, conducts *pro se* workshops, and provides legal advice and assistance to individuals in federal immigration detention. CAIR Coalition also secures pro bono legal counsel for immigration detainees, and provides in-house pro bono representation for detained adults and children.

CAIR Coalition submits this brief to address the profound real-world consequences of the issue presented, and to assist the Court's consideration of whether a lawful permanent resident who is in and admitted to the United States can nevertheless be "render[ed] . . . inadmissible" for purposes of the so-called "stop-time rule." The Court's answer to this question will have profound implications for lawful permanent residents in removal proceedings and their U.S. citizen family members and dependents, and will assist *amicus curiae* in counseling detained noncitizens, their families, and their criminal defense and immigration attorneys on the potential immigration consequences of certain offenses.[1]

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[1] Pursuant to Supreme Court Rule 37.6, *amicus curiae* states that no counsel for a party authored any part of the brief, and no person or entity other than *amicus curiae* and its counsel made a monetary contribution to the preparation or submission of this brief. The parties have consented to the filing of this brief;

SUMMARY OF ARGUMENT

Under the government's interpretation of the "stop-time rule," certain offenses such as first-time misdemeanor drug possession could subject lawful permanent residents (LPRs) to permanent deportation with no opportunity to request discretionary cancellation of removal. As *amicus curiae* will explain, this puts at risk LPRs with substantial and long-standing ties to U.S. citizens and U.S. communities, including some of who have lived in this country for decades, and who were raised here starting when they were small children.

Congress made cancellation of removal available to LPRs who have resided in the United States for at least seven years with a certain minimum level of good conduct. It did so because it recognized that deportation is a life-altering event for LPRs, their families—many of whom are U.S. citizens or LPRs themselves—and their communities. As this Court has stated, "[d]eportation can be the equivalent of banishment or exile." *Delgadillo v. Carmichael*, 332 U.S. 388, 391 (1947).

As Petitioner has explained on the merits, Congress did not intend for an offense that could not be the basis for deportation to deprive Petitioner of the opportunity seek discretionary relief from deportation. So too for the other LPRs *amicus curiae* discusses below, all of whom the government claims, or has previously claimed, are ineligible to seek cancellation of removal because of minor marijuana possession offenses.

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petitioner has filed a blanket consent with the Clerk, and respondent has provided a letter of consent to *amicus* counsel.

Under Petitioner's statutory interpretation, the Attorney General retains the discretion to deport removable LPRs in appropriate circumstances. The Attorney General, in contrast, urges a statutory construction that would constrain his discretion. If accepted, a minor offense such as first-time misdemeanor marijuana possession could be the difference between deportation and continued lawful residence in the United States. As the stories of the individuals profiled below demonstrate, such an interpretation would have dramatic and harsh effects on the lives of LPRs who qualify on the merits for discretionary cancellation of removal, their families, and their communities.

ARGUMENT

I. The Statutory Framework

A. The INA distinguishes between noncitizens who are deportable, and those who may not be admitted in the first place.

The United States is home to millions of noncitizen residents who have "been lawfully accorded the privilege of residing permanently in the United States." 8 U.S.C. § 1101(a)(20); Dep't of Homeland Sec., Office of Immigr. Statistics, Estimates of the Lawful Permanent Resident Population in the United States: January 2015 at 2 (May 2019) (13.2 million lawful permanent residents as of 2015), https://www.dhs.gov/sites/default/files/publications/lpr_population_estimates_january_2015.pdf (last visited July 3, 2019). While LPRs enjoy many rights and privileges, they are potentially subject to deportation in the limited circumstances set out in 8 U.S.C. § 1227.

Congress and the courts have long recognized the seriousness of deportation—particularly for residents who have lived and worked in this country for many years, have deep community ties, and may have U.S. citizen children, spouses, or other family members who rely on them. *See*, *e.g.*, *Padilla v. Kentucky*, 559 U.S. 356, 365 (2010) ("We have long recognized that deportation is a particularly severe penalty[.]" (quotation omitted)); *Delgadillo*, 332 U.S. at 391 ("Deportation can be the equivalent of banishment or exile. The stakes are indeed high and momentous for the alien who has acquired his residence here." (citation omitted)). Congress created different standards for when a stranger to this country may be excluded as inadmissible, and when a lawfully-present person may be forcibly expelled.

The INA creates two categories of noncitizens: those who can be charged as "inadmissible" and those who can be charged as "deportable." Noncitizens are subject to different grounds of removal depending on whether they have been admitted. Section 1227 sets out the circumstances under which a noncitizen who is "in and admitted to the United States" may be deported, and a separate provision, 8 U.S.C. § 1182, sets out the grounds under which an alien is "inadmissible . . . and ineligible to be admitted to the United States." For many years, the government used different proceedings to determine whether a noncitizen was deportable or inadmissible. In 1996, Congress combined these into a single procedure known as a "removal proceeding" that can adjudicate either the exclusion of an unadmitted noncitizen, or the deportation of one who has been admitted. 8 U.S.C. § 1229a(a)(3).

But the statutory bases for excluding

> and deporting aliens have always varied. Now, as before, the immigration laws provide two separate lists of substantive grounds, principally involving criminal offenses, for these two actions. One list specifies what kinds of crime render an alien excludable (or in the term the statute now uses, "inadmissible"), see [8 U.S.C.] § 1182(a) (2006 ed., Supp. IV), while another—sometimes overlapping and sometimes divergent—list specifies what kinds of crime render an alien deportable from the country, see [8 U.S.C.] § 1227(a).

Judulang v. Holder, 565 U.S. 42, 46 (2011).

As the Court noted in *Judulang*, some grounds of inadmissibility and deportability are identical, but Congress also created many important distinctions. *Id.* Section 1182(a)(2) makes an alien "inadmissible" if he or she is convicted of certain crimes, including crimes of moral turpitude and drug offenses. Section 1227 makes an alien deportable based on a different list of offenses.

For example, crimes involving moral turpitude have different consequences for inadmissibility and deportability. While a single crime of moral turpitude at any time can render a noncitizen inadmissible, 8 U.S.C. § 1182(a)(2)(A)(i), an admitted noncitizen becomes deportable only if he or she commits two crimes involving moral turpitude or one such crime within five years of admission, 8 U.S.C.

§ 1227(a)(2)(A)(i)(I).[2]

Another important distinction is the different treatment of minor drug-related offenses. The grounds of inadmissibility apply to noncitizens who are convicted of any law relating to a controlled substance, 8 U.S.C. § 1182(a)(2)(A)(i)(II), while the grounds of deportability contain an exception for noncitizens who admit to or are convicted of a "single offense involving possession for one's own use of 30 grams or less of marijuana," 8 U.S.C. § 1227(a)(2)(B)(i). *See also* H.R. Rep. No. 100-882, at 43 (1988) (Congress "believe[d] that aliens convicted of a minor possession offense involving marihuana do not pose a significant threat to society or U.S. citizens"). Congress thus provided that a first-time marijuana possession offense could be the basis for excluding a noncitizen who had never been admitted to the United States, but would not justify deporting an LPR or other noncitizen who had been admitted.

To begin removal proceedings against a noncitizen, the government must charge the individual with either inadmissibility under section 1182(a) or deportability under section 1227(a). 8 U.S.C. § 1229a(a)(2). Admitted noncitizens may be charged only with deportability, while unadmitted noncitizens may be charged only with inadmissibility. 8 U.S.C. § 1229a(a)(3). In other words, a noncitizen can be subject to the grounds of inadmissibility or the grounds of deportability, but not both. *See, e.g.*, *In re*

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[2] It is undisputed that Mr. Barton's single crime involving moral turpitude committed more than five years after his admission did not itself render him deportable, even though it is the offense the government relies on in contending that he is ineligible for cancellation of removal. *See generally* Pet'r's Br. at 8–10.

Peña, 26 I. & N. Dec. 613, 615–18 (BIA 2015).

B. Congress was mindful of the distinction between inadmissible and deportable noncitizens in crafting the stop-time rule, and it created separate standards for each.

The Attorney General has the discretion to cancel the removal of a noncitizen. 8 U.S.C. § 1229b. LPRs may seek cancellation of removal under 8 U.S.C. § 1229b(a), while any noncitizen may seek cancellation of removal under the more restrictive requirements of 8 U.S.C. § 1229b(b). An LPR may seek cancellation of removal if he or she (1) has been an LPR for at least five years, (2) "has resided in the United States continuously for 7 years after having been admitted in any status," and (3) has not been convicted of an aggravated felony. 8 U.S.C. § 1229b(a). By contrast, a noncitizen who is not an LPR is eligible for cancellation of removal only if he or she "has been physically present in the United States for a continuous period of not less than 10 years immediately preceding the date of such application," is of good moral character, has not been convicted of specified offenses, and removal would result in "exceptional and extremely unusual hardship" to family members who are citizens or LPRs. 8 U.S.C. § 1229b(b)(1).

Both the seven-year continuous residence requirement for LPRs and the ten-year continuous presence requirement for other noncitizens are subject to the stop-time rule. This provision sets out the circumstances in which the continuous residence or physical presence period may be deemed to end even if the noncitizen continues to be actually present in the United States:

> [A]ny period of continuous residence or continuous physical presence in the United States shall be deemed to end . . . when the alien has committed an offense referred to in section 1182(a)(2) of this title that renders the alien inadmissible to the United States under section 1182(a)(2) of this title or removable from the United States under section 1227(a)(2) or 1227(a)(4) of this title[.]

8 U.S.C. § 1229b(d)(1).

Congress fashioned a single statutory provision that applies to two different types of cancellation of removal applications (those filed by LPRs versus those filed by other noncitizens) and the different time-period requirements of each type (seven years of continuous residence versus ten years of continuous physical presence). Congress was aware that the stop-time rule would apply in some removal proceedings involving deportability, and in other proceedings involving inadmissibility. In light of these separate considerations, the stop-time rule expressly references the inadmissibility provisions of section 1182 and the deportability provisions of sections 1227(a)(2) and 1227(a)(4), and when the noncitizen was rendered inadmissible or deportable is a necessary component of the rule's application.[3]

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[3] For purposes of the stop-time rule, the key issue is whether an individual accrued seven years of lawful residence without being subject to removal. For the reasons stated in the brief of *amici curiae* Momodoulamin Jobe and the Immigrant Defense Project, a person who seeks readmission after traveling should not be subject to a backward-looking stop-time rule. *See*

II. The Government's Reading of the Stop-Time Rule Would Erroneously Constrain the Attorney General's Discretion and Subject Longtime Lawful Permanent Residents to Deportation Without the Possibility of a Reprieve as a Consequence of Misdemeanor Violations.

Section 1229b gives noncitizens with established ties to the United States the opportunity to demonstrate that there are compelling reasons why they should not be deported. This case does not address which noncitizens should be granted cancellation of removal; that decision is entrusted to the Attorney General in his discretion and based on a review of the relevant facts and circumstances.[4]

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generally Br. for Jobe *et al.* as Amici Curiae Supporting Pet'r at 15–39, *Barton v. Barr*, No. 18-275. CAIR Coalition respectfully suggests that this Court should adopt a rule based on whether the individual accrued seven years of lawful residence without being found removable, or should reserve that issue for another case.

[4] The BIA has noted that "favorable considerations include such factors as family ties within the United States, residence of long duration in this country (particularly when the inception of residence occurred at a young age), evidence of hardship to the respondent and his family if deportation occurs, service in this country's armed forces, a history of employment, the existence of property or business ties, evidence of value and service to the community, proof of genuine rehabilitation if a criminal record exists, and other evidence attesting to a respondent's good character." *In re C-V-T*, 22 I. & N. Dec. 7, 11 (BIA 1998) (also noting that "there is no inflexible standard for determining who should be granted discretionary relief, and each case must be judged on its own merits"). The presence of minor U.S. citizen children is also a factor that may be considered. *See In re Arreguin De Rodriguez*, 21 I. & N. Dec. 38, 41 (BIA 1995).

Rather, this case concerns whether Congress stripped the Attorney General of the discretion to consider certain applications for cancellation of removal on the merits based on events that may have happened many years or even decades before the relevant removal proceedings.

Although the Attorney General argues that he lacks the discretion to consider Mr. Barton's application on the merits, it is difficult to see why Congress would have both given him the discretion and then constrained it in so unusual a way. It would be inconsistent with the overall structure of the INA—including the distinctions between inadmissibility and deportability, and the cancellation of removal system—for Congress to have barred the Attorney General from considering relief from removal because of an offense that could not itself justify deportation, and which may have been committed long before any removal proceeding. The Attorney General's evaluation of the merits *causes* no harm in any case, and in some cases the exercise of discretion can *prevent* enormous harm—to the noncitizen who has resided in this country for many years, to the U.S. citizen family members who rely on him or her, and to the community of which the noncitizen is a part.

Mr. Barton's case exemplifies this harm. The Immigration Judge (IJ) found that cancellation of removal is warranted, and but for her reading of the

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Negative factors may include the circumstances that give rise to removability, other immigration violations, a criminal record, or other evidence of bad character or undesirability. *See In re Edwards*, 10 I. & N. Dec. 506 (BIA 1964); *In re Marin*, 16 I. & N. Dec. 581, 585 (BIA 1978).

stop-time rule, the IJ would have granted relief. The IJ found that Mr. Barton's was last arrested more than a decade ago, and he is "clearly rehabilitated." Pet'r's Br. at 11. The IJ noted that Mr. Barton has four young U.S.-citizen children, and that his fiancée, mother, and several other relatives also live in the United States. *Id.* Mr. Barton is the primary support for his family, and the IJ found that they "would suffer hardship if he were deported." *Id.*

Just as the government's narrow interpretation of the stop-time rule would lead to the deportation of a father and businessman who has overcome past mistakes, it also threatens to attach life-altering consequences to a single misdemeanor marijuana possession offense. As noted above, Congress determined that a first-time offense of possession a small amount of marijuana does not warrant deportation, but could make an individual inadmissible. *Compare* 8 U.S.C. § 1227(a)(2)(B)(i) *with* 8 U.S.C. § 1182(a)(2)(A)(i)(II). In 2017, there were nearly 600,000 marijuana possession arrests in the United States. *See* Federal Bureau of Investigation, Uniform Crime Report: Crime in the United States, 2017 (Fall 2018), https://ucr.fbi.gov/crime-in-the-u.s/2017/crime-in-the-u.s.-2017/topic-pages/persons-arrested. In the government's view, any LPR who commits a misdemeanor marijuana possession violation within seven years of admission would be permanently ineligible for cancelation of removal—even if it was legally impossible to charge him or her with removability until the occurrence of a separate qualifying offense years, or even decades, later. Congress did not intend this peculiar and severe result.

The cases of Y.D. and O.T. are two of many examples of the harsh consequences that flow from the Attorney General's position.

A. Y.D.

Y.D. is an LPR who has lived in this country for twenty-six years. The government is currently seeking to deport Y.D. based on misdemeanor marijuana possession offenses. Y.D.'s appeal challenging his deportation order is currently pending before the United States Court of Appeals for the Fourth Circuit.[5]

Y.D. came to the United States from El Salvador at the age of seven, not long after the Salvadoran Civil War. With help from his aunt, a U.S. citizen, he and his mother arrived in San Diego, California in 1993.

Y.D. grew up in Virginia, where he attended elementary, middle, and high school. As an adult, Y.D. has worked consistently in restaurant, landscaping and service positions. A Catholic, Y.D. is well liked and friendly with coworkers and customers, according to his managers.

Y.D. has strong family ties in the United States. His mother is an LPR, and his aunt, uncle, and adult cousin are all U.S. citizens. Y.D. has no immediate family members who still live in El Salvador, and no one to live with should he be forced to return.

Although Y.D. is a Salvadoran citizen, El Salvador is effectively a foreign country, in which he has not lived since he was a small child. It is also a dangerous

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[5] The facts of Y.D.'s case are found in the Certified Administrative Record filed with the Fourth Circuit (also on file with counsel for *amicus curiae*).

country for him. Five years ago, his aunt was accosted by two cousins who were armed and believed to be members of the MS-13 gang. They demanded money, and, when Y.D.'s aunt refused, the cousins warned her and her family never to return to El Salvador. Y.D. and his aunt fear that any family members who return to El Salvador will be killed by the gang.

Y.D. was admitted as an LPR in November 2006, when he was 20 years old. More than six years later, in February 2013, Y.D. was arrested for misdemeanor possession of marijuana in violation of Virginia law. He pleaded guilty, and as a first-time offender received deferred adjudication. In 2015 and 2016, he was convicted of misdemeanor marijuana possession.

The government charged Y.D. with removability based on these misdemeanor marijuana possession offenses. Y.D. sought discretionary cancellation of removal. It is undisputed that Y.D. lawfully resided in the United States for more than seven years before committing any offense that made him "removable from the United States under section 1227(a)(2) or 1227(a)(4)." 8 U.S.C. § 1229b(d)(1). Yet the IJ pretermitted his application on the ground that Y.D.'s 2013 misdemeanor marijuana possession offense rendered him "inadmissible," despite being admitted to the United States at all relevant times, and the Board of Immigration Appeals (BIA) affirmed. At thirty-three years old, Y.D. now faces deportation to El Salvador. Regardless of whether Y.D. might ultimately receive discretionary relief, the INA requires the Attorney General to at least consider the equities of deporting Y.D. to a country he has not lived in since he was seven years old, and of long-term separation from his daughter, mother and numerous other U.S.-based relatives.

B. O.T.

O.T. is a Mexican citizen and U.S. LPR whose family brought him to the United States in 1990 when he was four years old.[6] O.T. grew up in this country, and attended Virginia public schools. As an adult, O.T. has worked hard to support himself and his family, principally in the construction business, including his own Northern Virginia sole proprietorship.

The center of O.T.'s life in the United States is his fourteen-year-old daughter, N.T., who is a U.S. citizen. She was born in 2005 to O.T. and his then-partner, whom he met in high school. Although O.T. and N.T.'s mother separated, they remain on good terms. O.T. is actively involved in his daughter's upbringing, seeing her at least once a week. O.T. taught his daughter how to ride a bicycle and swim, and he carefully supervises her schoolwork and grades to instill in her the importance of education. Every year, O.T. throws a party for his daughter on her birthday.

In addition to his U.S.-citizen daughter, O.T.'s mother, three brothers, and nine nieces and nephews all live near him in Northern Virginia, and more relatives live in Texas. O.T. lives with his mother, now a U.S. citizen, and helps her keep the household. Along with helping his mother pay rent, O.T. buys groceries, performs yardwork and home repairs, and takes his mother to her medical appointments. Because English is his primary language, O.T.

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[6] The facts of O.T.'s case are detailed in a declaration by one of his attorneys and a statement from O.T. *See* Decl. of Adina Appelbaum, Esq. (on file with counsel); Statement of [O.T.]. (on file with counsel).

translates and explains important correspondence for his mother. O.T. considers the local Boys & Girls Club, where he volunteers often, to be his unofficial "family."

O.T. was admitted as an LPR in March 2000, at age 14. Six years and five months later, in August 2006, he was arrested for misdemeanor possession of marijuana, paid a fine, and received no jail time. For a second misdemeanor possession of marijuana more than three years later, in January 2010, O.T.'s driver's license was suspended for six months, and he again received no jail time.

In June 2015, O.T. took a brief trip to Mexico, the first time he had visited in more than a decade. When O.T. returned home, Customs and Border Patrol (CBP) stopped him based on his prior marijuana misdemeanors before ultimately allowing him to reenter the United States. Despite CBP's decision to allow him to return home, Immigration and Customs Enforcement (ICE) later arrested O.T. at his mother's house, and instituted removal proceedings based on the same misdemeanor drug offenses. While in ICE detention, O.T. missed his daughter's birthday for the first time, and was unable to visit his mother in the hospital.

It was undisputed that the August 2006 possession violation did not make O.T. removable, 8 U.S.C. § 1227(a)(2)(B)(i), and the January 2010 violation occurred almost a decade after O.T. was admitted. O.T. was not charged with removability until more than fifteen years after his admission as an LPR. Under the government's reading of the stop-time rule, he was—as a man in his thirties—ineligible for cancellation of removal because of a misdemeanor marijuana possession offense committed more than a

decade earlier.

Because O.T. agreed to assist law enforcement by serving as a witness in a criminal proceeding involving an altercation between third parties, the government exercised prosecutorial discretion not to pursue removal proceedings. However, that discretionary decision leaves O.T. vulnerable should the government choose to reinstate deportation proceedings. If that were to happen, under the government's statutory construction, O.T. would be ineligible to seek cancellation of removal even though he has lived in this country for nearly thirty years.

III. The Government's Position Is Contrary to Prior BIA Cases Recognizing That LPRs in and Admitted to the U.S. Cannot Be "Inadmissible" for Purposes of the Stop-Time Rule.

The BIA's opinion in this case is contrary to at least two prior unpublished BIA decisions—including one by the same Board Member who authored the BIA decision in Mr. Barton's case. Faced with the same type of first-time marijuana possession offense presented in the cases of Y.D. and O.T., and addressing the same legal issue presented in Mr. Barton's case, the BIA previously found that the stop-time rule was not applicable where an LPR who is in and admitted to the United States had committed an offense that could render a noncitizen "inadmissible." Rather, the BIA determined—expressly in the case of Ruben Lara-Terrazas and implicitly in the case of Sergio Barrios-Castillo—that the stop-time rule applies to a noncitizen present in and admitted to the United States only if the individual is deportable. While the BIA is not bound by its own unpublished decisions, "courts typically look askance at an agency's unexplained deviation

from a prior decision, even when the prior decision is unpublished." *Perez-Vargas v. Gonzales*, 478 F.3d 191, 193 n.3 (4th Cir. 2007).

A. Ruben Lara-Terrazas

Mr. Lara-Terrazas is a citizen of Mexico who became an LPR in August 1979. *See In re Lara-Terrazas*, 2006 WL 3922203, at *1 (BIA Dec. 11, 2006). Nearly five years later, in July 1984, he pleaded guilty to possessing two ounces or less of marijuana. *Id.* at *1, 2. Mr. Lara-Terrazas subsequently was convicted in 1996 and 2000 for possession and attempted possession of marijuana. *Id.* at *1.

When the government sought to remove Mr. Lara-Terrazas, he applied for cancellation of removal. The IJ ruled that the 1984 marijuana offense triggered the stop-time rule because it rendered Mr. Lara-Terrazas inadmissible. *Id.* On appeal, the BIA found Mr. Lara-Terrazas ineligible for cancellation of removal, but not because he had been rendered inadmissible. *Id.* at *2. Rather, it found that the 1984 offense did not render him inadmissible within the meaning of under the stop-time rule because the grounds of inadmissibility "are applicable to aliens who are seeking admission into the United States," not to aliens lawfully admitted for permanent residence, and Mr. Lara-Terrazas was not "regarded as seeking admission." *Id.* at *1.

B. Sergio Barrios-Castillo

A native of Mexico, Mr. Barrios-Castillo was admitted as an LPR in December 1997. *See In re Barrios-Castillo*, 2007 WL 1520882, at *1 (BIA May 11, 2007). The next year, Mr. Barrios-Castillo was convicted of possessing two ounces or less of

marijuana. *Id.* Years later, when the Government sought to remove him, Mr. Barrios-Castillo filed a *pro se* application for cancellation of removal. The IJ ruled that he could not seek cancellation of removal because the 1998 conviction stopped the accrual of time and Mr. Barrios-Castillo therefore could not establish the required seven-years of continuous residency in the United States. *Id.* at *2.

On appeal to the BIA, Board Member Pauley—the same Board Member who authored the underlying BIA decision in Mr. Barton's case—issued a decision reversing the IJ on the ground that the first-offense marijuana conviction did not make Mr. Barrios-Castillo removable, and therefore did not stop the clock. *Id.* (citing exception in Section 1227 for a single offense involving marijuana possession of 30 grams or less for one's own use). Because the 1998 conviction clearly would have rendered Mr. Barrios-Castillo inadmissible had the inadmissibility criteria been applicable, in vacating and remanding the case the BIA implicitly acknowledged that the stop-time rule could be invoked for an LPR present in the United States only where the offense rendered him deportable.

CONCLUSION

Amicus curiae CAIR Coalition respectfully suggests that the Eleventh Circuit's decision should be reversed.

July 3, 2019 Respectfully submitted,

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