NO. 20-1029

IN THE
Supreme Court of the United States

CITY OF AUSTIN, TEXAS,
Petitioner,

v.

REAGAN NATIONAL ADVERTISING OF AUSTIN, LLC, ET AL.,
Respondents.

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

BRIEF OF ALLIANCE DEFENDING FREEDOM AND THE ISLAM AND RELIGIOUS FREEDOM ACTION TEAM OF THE RELIGIOUS FREEDOM INSTITUTE AS *AMICI CURIAE* IN SUPPORT OF RESPONDENTS

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INTEREST OF *AMICI CURIAE*[1]

Alliance Defending Freedom ("ADF") is a non-profit, public interest legal organization that provides strategic planning, training, funding, and litigation services to protect our First Amendment freedoms—including free speech. Since 1994, ADF has played a role, either directly or indirectly, in many cases before this Court, including *Americans for Prosperity Foundation* v. *Bonta*, 141 S. Ct. 2373 (2021) (representing Thomas More Law Center); *Masterpiece Cakeshop, Ltd.* v. *Colorado Civil Rights Commission*, 138 S. Ct. 1719 (2018) (representing Christian cake artist Jack Phillips); *National Institute of Family & Life Advocates* v. *Becerra*, 138 S. Ct. 2361 (2018) ("*NIFLA*") (representing pro-life pregnancy centers); *Reed* v. *Town of Gilbert*, 576 U.S. 155 (2015) (representing church and its pastor, Clyde Reed); *McCullen* v. *Coakley*, 573 U.S. 464 (2014) (representing pro-life sidewalk counselor Eleanor McCullen), and hundreds more cases in lower courts.

The Islam and Religious Freedom Action Team ("IRF") of the Religious Freedom Institute amplifies Muslim voices on religious freedom, seeks a deeper understanding of the support for religious freedom inside the teachings of Islam, and protects the religious freedom and speech of Muslims. To this end, the IRF engages in research, education, and advocacy on core issues including freedom from coercion in

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[1] No counsel for a party authored this brief in whole or in part, and no person other than *amici* and their counsel made any monetary contribution intended to fund the preparation or submission of this brief. Counsel were timely notified of this brief as required by Supreme Court Rule 37.2, and all parties consented to its filing.

religion and equal citizenship for people of diverse faiths. The IRF explores and supports religious freedom by translating resources by Muslims about religious freedom, fostering inclusion of Muslims in religious freedom work both where Muslims are a majority and where they are a minority, and by partnering with the Institute's other teams in advocacy.

ADF and the IRF have a particular interest in protecting religious, ideological, and political speech. And they file this amicus brief to highlight for the Court the many ways the City of Austin's sign code impermissibly restricts such speech.

SUMMARY OF THE ARGUMENT

The City of Austin regulates signs differently based on whether the sign's content is related to the premises where the sign is located ("on-premises") or some other location ("off-premises"). In deciding which rules apply to a particular sign, enforcement officials must read the sign, evaluate its content, and determine whether that content relates to something located on the premises. Such rules "cannot be justified without reference to the content of the regulated speech," and they are therefore "content-based" regulations subject to strict scrutiny. *Reed*, 576 U.S. at 164. Applying strict scrutiny to content-based regulations like the City's sign code is especially important for the types of speech that are the hardest to classify based on location, including ideological, political, and religious speech. And that's especially true given the inherent risk that enforcement officials will discriminate against speech falling into these categories based on disagreement with the viewpoint expressed.

ARGUMENT

I. Content-based speech restrictions require strict scrutiny because they pave the way for more invidious forms of government censorship and discrimination.

Under the First Amendment, this Court has long recognized that content-based restrictions, meaning "those that target speech based on its communicative content," are "presumptively unconstitutional." *Reed*, 576 U.S. at 163. On the surface, such restrictions might seem like a "rational way to regulate." *Id.* at 171. But there's a deeper problem: allowing government to regulate content "poses the inherent risk that [it] seeks not to advance a legitimate regulatory goal, but to suppress unpopular ideas or information." *NIFLA*, 138 S. Ct. at 2374 (cleaned up).

And that risk is real even when the officials who *adopted* the law had benign motives. Laws that were "adopted by the government because of disagreement with the message the speech conveys," obviously are content based. *Reed*, 576 U.S. at 164 (cleaned up). But "[i]nnocent motives do not eliminate the danger of censorship presented by a facially content-based statute, as future government officials may one day wield such statutes to suppress disfavored speech." *Id.* at 167. "The vice of content-based legislation—what renders it deserving of the high standard of strict scrutiny—is not that it is always used for invidious, thought-control purposes, but that it lends itself to use for those purposes." *Hill* v. *Colorado*, 530 U.S. 703, 743 (2000) (Scalia, J., dissenting) (quoted approvingly in *Reed*).

That is why this Court has insisted on a "clear and firm rule governing content neutrality [as] an essential means of protecting the freedom of speech." *Reed*, 576 U.S. at 171. The First Amendment's protections against content-based laws "create a buffer zone guaranteeing that the government cannot favor or disfavor certain viewpoints." *Id.* at 183 (Kagan, J., concurring in the judgment). That buffer is particularly important for the types of speech that encompass the broadest array of viewpoints: ideological, political, and religious speech. All three are uniquely burdened—and uniquely threatened—by content-based laws like the one challenged here.

II. Like the law regulating directional signs in *Reed*, the City's sign code regulating signs that direct people to other locations is content based.

In *Reed*, this Court held that "[g]overnment regulation of speech is content based if a law applies to particular speech because of the topic discussed or the idea or message expressed." 576 U.S. at 163. Some content-based restrictions "are obvious, defining regulated speech by a particular subject matter, and others are more subtle, defining regulated speech by its function or purpose." *Ibid.* "Both are distinctions drawn based on the message a speaker conveys," and both "are subject to strict scrutiny." *Id.* at 163–64.

Relevant here, *Reed* held that a town's restriction on "Temporary Directional Signs" was content based because it treated certain types of speech differently based on "whether a sign convey[ed] the message of directing the public to church or some other 'qualifying event.'" 576 U.S. at 164. As a result, the

plaintiff "Church's signs inviting people to attend its worship services [were] treated differently from signs conveying other types of ideas." *Ibid.* That was a problem regardless of the town's reasons for adopting the ordinance because of the risks inherent in all content-based restrictions. *Id.* at 167. "[O]ne could easily imagine a Sign Code compliance manager who disliked the Church's substantive teachings deploying the Sign Code to make it more difficult for the Church to inform the public of the location of its services." *Id.* at 167–68. Strict scrutiny applied. *Id.* at 171.[2]

So too here. The City's sign code strictly regulates existing "off-premises" signs and prohibits the creation of new "off-premises" signs. Pet. Br. 1, 4, 19 (citing Austin City Code § 25-10-102(1) (J.A. 76)). An "off-premises" sign is defined as a sign that "advertis[es] a business, person, activity, goods, products, or services not located on the site where the sign is installed, or that *directs persons to any location not on that site*." Austin City Code § 25-10-3(11) (J.A. 52) (emphasis added).[3] Under *Reed*, by determining whether a sign is permitted based on "whether [it] conveys the message of directing the public" to some other location, *Reed*, 576 U.S. at 164, the City's code is a "content-based" restriction on speech, *id.* at 163.

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[2] Municipal taxation of billboards based on "off-premises" distinctions raises similar concerns. See Pet. for Cert., *Clear Channel Outdoor, LLC* v. *Raymond*, No. 21-219 (docketed Aug. 16, 2021).

[3] The City later amended the sign code, but the version in effect when it denied Respondents permits did not distinguish between commercial and noncommercial speech, and only that earlier version is at issue here. *Reagan Nat'l Advert. of Austin, Inc.* v. *City of Austin*, 972 F.3d 696, 701 (5th Cir. 2020) ("As Reagan and Lamar applied for permits under the old ordinance, we evaluate the constitutionality of the previous version of the ordinance.").

To illustrate that point, take the example of a hypothetical Catholic parish, St. Joseph, wishing to advertise a regular Thursday night bingo game. On the first Thursday of the year, the parish hosts its bingo game in the parish hall and advertises the event with a sign in front of the church:

Under the City's sign code, that sign would be subject to the code's "on-premises" rules because it advertises an activity located on the site where the sign is installed.

Now imagine that the parish hall needs some repair work, so the church has to hold its next bingo night at the parish hall of St. Helen, several miles away. The church changes its sign to read: "Bingo Thursday 6:30 p.m. This Thursday at St. Helen Parish Hall, 123 Main Street, Austin." Unlike the church's first sign, this second sign would be subject to the code's "off-premises" rules because it advertises an "activity . . . not located on the site where the sign is installed" and "directs persons to [a] location not on that site." Austin City Code § 25-10-3(11) (J.A. 52).

What has changed between the two signs to make them subject to different rules? The speaker (St. Joseph Church) remains the same. The sign's location (in front of St. Joseph Church) remains the same. The sign's size remains the same. Even the materials from which the sign is made remain the same. The *only* thing that has changed is the sign's *content*: what it says and the message it conveys. This is the very definition of a content-based distinction. "Because the message on the [sign] makes all the difference, the [sign code] amounts to a content-based regulation of speech." *L.D. Mgmt. Co.* v. *Gray*, 988 F.3d 836, 839 (6th Cir. 2021).

Numerous other examples of signs would fall prey to the City's content-based restrictions:

- A sign outside the local NAACP or Democratic Party office inviting members to come for an on-site meeting to discuss police violence or proposed election laws (on-premises) would be permissible under the City's sign code. But a sign directing members to meet outside city hall to protest the same issues (off-premises) would not.
- A sign outside a local church asking its members to pray for an end to abortion at an event in the church parking lot (on-premises) would be permissible. But a sign asking members to pray for an end to abortion at an event on the sidewalk outside an abortion clinic two miles away (off-premises) would not.

- A sign outside a Jewish synagogue inviting congregants to attend a prayer service at the synagogue for their retiring rabbi (on-premises) would be permissible. But a sign inviting them to the banquet to follow at a local hotel (off-premises) would not.

In each example, it is only the speech's content that varies and determines whether the sign is considered on-premises or off-premises under the City's sign code. And just like in *Reed*, "one could easily imagine a Sign Code compliance manager who disliked the Church's [or the synagogue's, or the NAACP's, or the Democratic Party's] substantive teachings deploying the Sign Code to make it more difficult for [them] to inform the public of the location" of their events. 576 U.S. at 167–68.

There is no "location exception" to the First Amendment. This Court rejected a similar argument in *Reed* when it held that a "regulation that targets a sign because it conveys an idea about a specific *event* is no less content based than a regulation that targets a sign because it conveys some other idea." *Id.* at 171 (emphasis added). That's true here, too. Speech doesn't become less worthy of protection simply because it refers to something or someone located somewhere else. Rather, the First Amendment fully protects the right to communicate about people, places, things, activities, and events *regardless* of whether they are located at the site where the speech occurs. "A regulation that targets a sign because it conveys an idea about a [location] is no less content based than a regulation that targets a sign because it conveys some other idea." *Ibid.*

III. Prohibiting such a broad category of speech doesn't limit the threat of invidious discrimination—it magnifies it.

A. Instead of just a few specific topics, the City's sign code allows it to control and preserve the status quo on everything.

As Justice Alito wrote in his *Reed* concurrence, "[c]ontent-based laws merit [the] protection" of strict scrutiny "because they present, albeit sometimes in a subtler form, the same dangers as laws that regulate speech based on viewpoint." 576 U.S. at 174 (Alito, J., concurring). "Limiting speech based on its 'topic' or 'subject' favors those who do not want to disturb the status quo." *Ibid.* And that government thumb on the scale in favor of the status quo is constitutionally suspect because it "may interfere with democratic self-government and the search for truth." *Ibid.*

The City argues that its sign code is not content-based because "it does not prohibit anyone from speaking on any *particular* topic." Pet. Br. 38 (emphasis added). But that's not the constitutional problem. As the City admits, the sign code mandates that, "to use an outdoor sign to communicate a message, the sign must not advertise something at a different location." *Id.* at 39. Nor may it "direct[] persons to any location not on that site." Austin City Code § 25-10-3(11) (J.A. 52). Yet, "something at a different location" *is* a topic protected by the First Amendment. This Court recognized that in *Reed* when it struck down the town's side code because it regulated "the message of directing the public to church or some other 'qualifying event'" differently from other "categories" of speech. 576 U.S. at 164.

The only difference here is that the "something" that shall not be named includes far more than the off-premises "qualifying event[s]" that were strictly regulated in *Reed*. 576 U.S. at 159. Under the City's sign code, *all* "business[es], person[s], activit[ies], goods, products, [and] services" located elsewhere are off limits. Austin City Code § 25-10-3(11) (J.A. 52). Full stop.

By prohibiting messages about anything and everything located or happening somewhere else in Austin, the City can effectively shut down any attempts to "disturb the status quo" within the city limits. *Reed*, 576 U.S. at 174 (Alito, J., concurring). Austin is well known for its slogan, "Keep Austin Weird." Meghan Overdeep, *The History Behind "Keep Austin Weird,"* SOUTHERN LIVING (July 21, 2019), perma.cc/SZ7Z-8ZW8. Under the First Amendment, though, the City can't "Keep Austin Progressive" or "Keep Austin Democratic" or "Keep Austin Non-Religious" by shutting down speech that might challenge the City's preferred status quo.

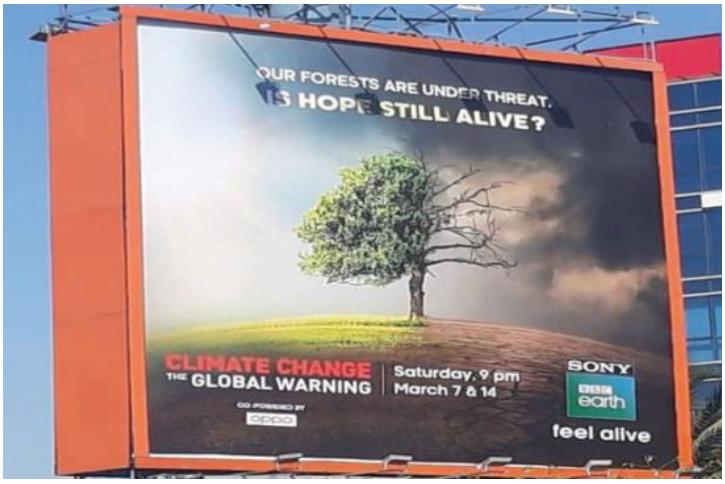
And the same is true of speech addressing topics located outside the Austin city limits. Indeed, every event, place, or thing located outside the city's approximately 274-square-mile boundaries qualifies as "something at a different location" under the City's sign code. Pet. Br. 39. On its face, the sign code even prohibits any new outdoor signs directing attention to things, events, or places located outside those boundaries. That is a very broad category indeed, effectively restricting speech about anything in the world's approximately 196 million square miles outside the city limits. See generally *Thomas* v. *Bright*, 937 F.3d 721, 724 (6th Cir. 2019), *cert. denied*

141 S. Ct. 194 (2020) (striking down "off-premises" sign-code restriction state had enforced against sign supporting U.S. Olympic team based on state's reasoning that "there were no activities on the lot to which the sign could possibly refer"). The sheer breadth of the prohibited content doesn't make the restriction any less content based. Just the opposite.

B. The sign code uniquely burdens ideological, political, and religious speech.

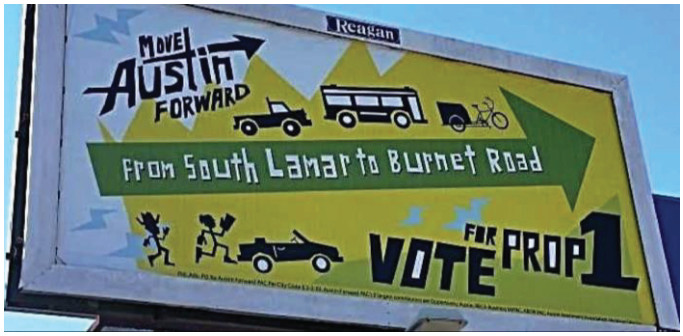
Of particular concern to ADF and the IRF are the unique burdens the City's regulatory distinction places on ideological, political, and religious speech. Almost by definition, much of the speech that falls into these categories refers to people, places, things, activities, and events located elsewhere.

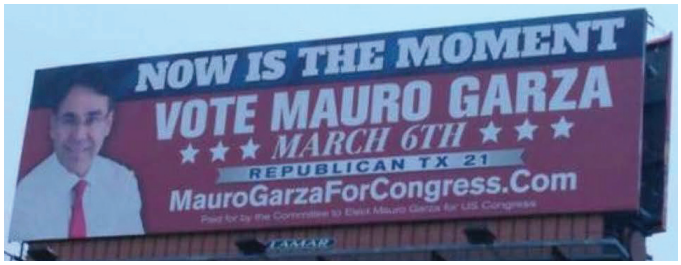
For example, ideological speech is rarely limited to or aimed at the four corners of the property where it's located. Consider the following billboard with a message about climate change:

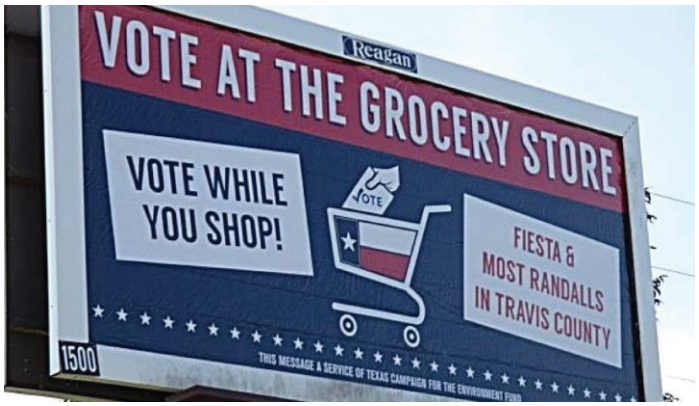


If that billboard appeared in any urban area in Austin, its message about climate change's threat to "our forests" would be "off-premises." To even stand a chance of qualifying as "on-premises," a billboard with that message would have to be erected in one of the city's few forested areas. That (ironic) result demonstrates the problem with trying to regulate ideological speech based on the location it references.

Like ideological speech, political speech is uniquely burdened by laws regulating off-premises content. Most political speech refers to people (like candidates and elected officials), places (like state capitols and other government centers), or events (like voting and demonstrations) located somewhere other than the place where the speech is expressed. For example, the record contains the following examples of political speech that would clearly qualify as "off-premises" under the City's sign code:







J.A. 132, 134, 142.

Finally, while most religious speech is not easily categorized as either on- or off-premises, entire sub-categories of core religious speech clearly qualify as off-premises. For instance, take the category of religious pilgrimages. By definition, a pilgrimage is the "journey of a pilgrim, especially one to a shrine or a sacred place." *Pilgrimage*, Merriam-Webster Dictionary, perma.cc/N4VV-Q357. See also *Pierson* v. *Ray*, 386 U.S. 547, 552 (1967) (discussing "prayer pilgrimage" taken by clergyman from New Orleans to Detroit "to promote racial equality and integration"); *U.S. on behalf of Zuni Tribe of N.M.* v. *Platt*, 730 F. Supp. 318, 319 (D. Ariz. 1990) (granting Zuni Indians a prescriptive easement across land in connection with their journey from New Mexico to Arizona as a "regular periodic pilgrimage at the time of the summer solstice," a tradition dating back as early as 1540 A.D.).

The largest pilgrimages in the world are massive religious gatherings which take place far away from the City of Austin:

- **Maha Kumbh Mela (India).** Hindu pilgrimage to bathe in the Ganges river. Approximately 120 million attendees every 12 years;
- **Arba-een (Iraq).** Shia Muslims travel to the city of Karbala. Approximately 10–20 million attendees annually;
- **Lourdes (France).** Catholics travel to the site where the Virgin Mary is said to have appeared to a peasant girl, Bernadette Soubirous, in 1858. Approximately 6 million pilgrims annually; and
- **Hajj (Saudi Arabia).** Muslims retrace the steps of Mohammad's first pilgrimage to Mecca. Approximately 2 million attendees annually.[4]

Pilgrimage sites also exist in Texas. For instance, the Shrine of the True Cross in Dickinson, Texas, advertises itself as "a sacred place of pilgrimage, a special place to draw closer to God through prayer, reflection, and devotion to the Cross of Christ." *Shrine of the True Cross*, perma.cc/D3UP-XSEQ. And every year since 1925, the Daughters of the Republic of Texas have staged an annual pilgrimage to the Alamo to honor those who died there. David Bowles, *The Westward Sagas*, perma.cc/TG37-F928.

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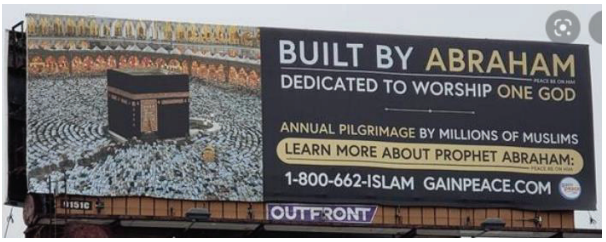
[4] While some pilgrimages are considered voluntary, courts have recognized that the Hajj is mandatory for Muslims. See *United States* v. *Minhas*, 850 F.3d 873, 879 (7th Cir. 2017) ("The hajj is an annual pilgrimage to Islam's holiest site, Mecca, and making it is a religious duty to be performed at least once in the lifetime by every able-bodied Muslim who can afford the trip.").

Since a pilgrimage involves a journey, a sign like the one below will *always* be an "off-premises" sign under the City's content-based sign code:

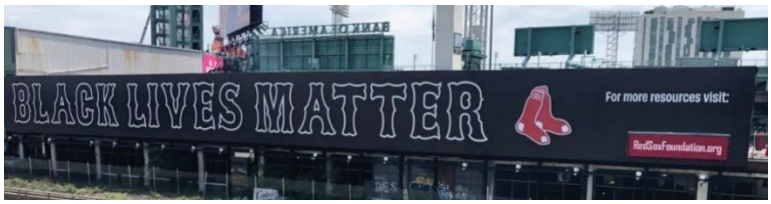


If a temple, mosque, or church wishes to put up a similar sign encouraging its members to take a pilgrimage, such a sign would run afoul of the City's prohibition on new off-premises signs.

C. The sign code uniquely threatens ideological, political, and religious speech with viewpoint-based discrimination.

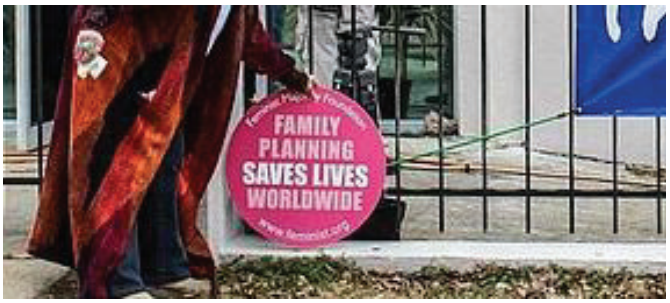
The Fifth Circuit properly recognized below that government inquiry into whether a sign is on- or off-premises requires more than a "cursory examination" of the sign's content. *Reagan Nat'l Advert.*, 972 F.3d at 705–06. Not only does it require determining who is speaking and what the speaker is saying, it also requires attempting to categorize types of speech that are not easily capable of on- or off-premises distinctions. *Ibid.* As a result, enforcement officials have a great deal of discretion to determine which signs are allowed and which are prohibited. And that's especially problematic for types of speech—like the religious speech in *Reed*—that are most likely to be subjected to discrimination.

For example, ideological speech is often difficult to categorize based on the location it refers to:



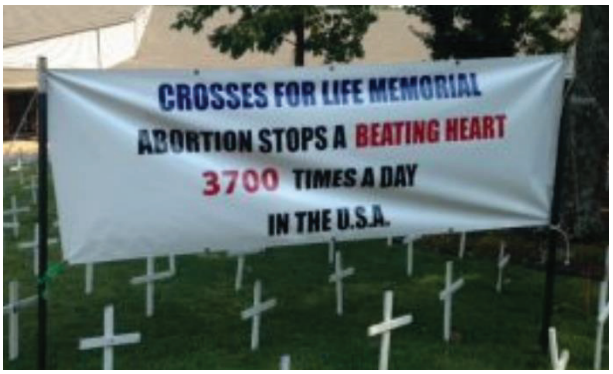
Does this sign outside Fenway Park display an off-premises message about the Black Lives Matter movement broadly? Or is it an on-premises message about the Boston Red Sox organization's support for that broader movement? Or is it an even narrower on-premises message supporting the organization's black athletes, employees, and fans? And does the fact that it directs the reader to an off-premises(?) website change the result?

What about a sign like this one located outside an abortion clinic?



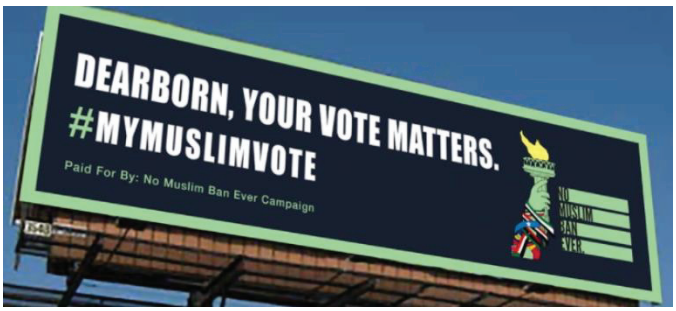
If the clinic offers family-planning services, is that enough to make it an "on-premises" sign? Or does the fact that it references family planning "worldwide" disqualify it? What about an "Abortion Saves Lives" sign outside a Planned Parenthood clinic that doesn't perform abortions? Would the answer depend on the enforcement official's personal beliefs about abortion?

What about this sign outside a church sponsoring a pro-life memorial on its property?



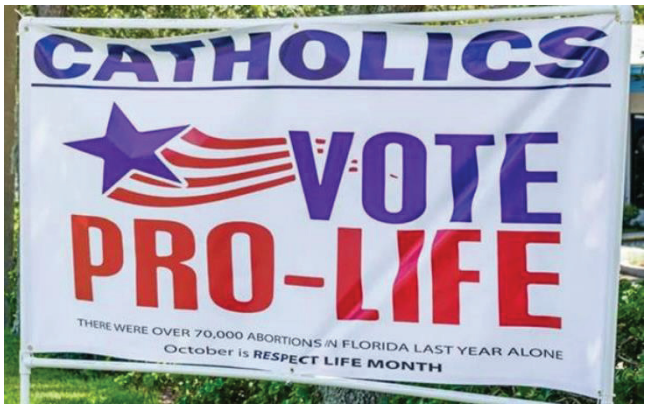
"On-premises" because it explains the memorial? Or "off-premises" because it references abortions that occur elsewhere? What about just a sign that reads "Abortion Stops a Beating Heart" in front of a pro-life pregnancy center? Can pregnancy centers even post signs about abortion under the city's sign code?

Political speech runs into the same problems. The message on this sign is at least limited to the City of Dearborn, and maybe even to each individual passerby who reads the sign:



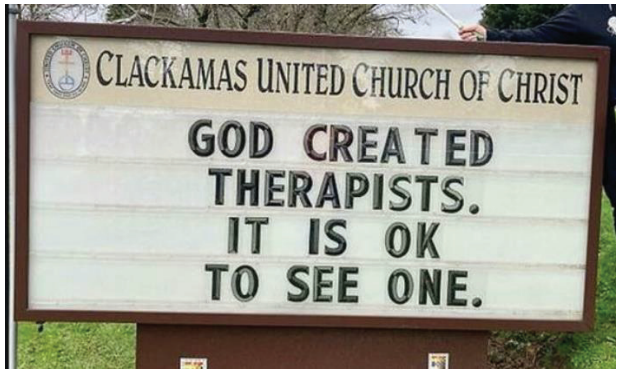
Is that close enough to make the sign "on-premises" under the sign code? Or does the fact that it references a Muslim ban make it "off-premises" by definition?

And what about this sign outside a church?



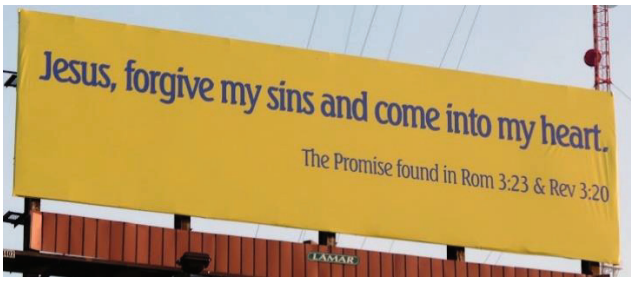
Is it an "on-premises" description of the voting habits of most of the church's members? Or an "off-premises" message encouraging Catholics to vote for pro-life candidates when they go to the polls?

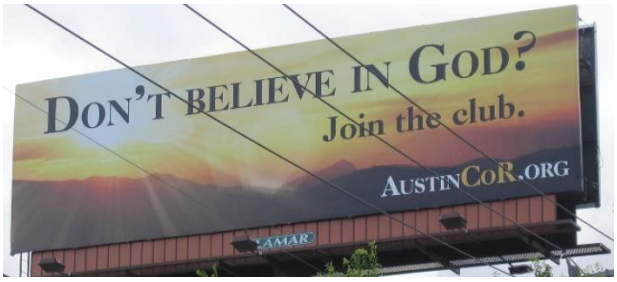
Non-political religious signs can be just as hard to categorize using the City's labels. For example, because this sign references God, is it considered "on-premises" if it's located outside a church?



Or is it "off-premises" because it encourages readers to see therapists located elsewhere? What if the pastor is himself also a therapist?

And what about signs encouraging readers to convert to a particular faith (or non-faith)?





Under the City's sign code, a government official would have to read each of the above signs and decide whether the thing they direct attention to is located on the premises or somewhere else. But these messages are not capable of easy categorization based on premises. And giving enforcement officials free rein to read and categorize them is a slippery slope towards viewpoint-based discrimination and censorship. See *Forsyth Cnty.* v. *Nationalist Movement*, 505 U.S. 123, 130 (1992) (a "government regulation that allows arbitrary application . . . has the potential for becoming a means of suppressing a particular point of view") (cleaned up); *Amidon* v. *Student Ass'n of State Univ. of N.Y. at Albany*, 508 F.3d 94, 103 (2d Cir. 2007) (this Court "prohibits unbridled discretion because it allows officials to suppress viewpoints in surreptitious ways that are difficult to detect").

IV. Content-based sign regulations are not necessary to regulate billboards.

The City and supporting amici argue that premises-based regulations like the City's sign code are necessary to address important governmental interests related to billboards such as motorist safety and aesthetics. ADF and the IRF are sensitive to those concerns. After all, billboards are a unique form of sign given their large size, high visibility to motorists, and regular use for paid advertising. But the answer is not to categorize billboards using a content-based definition. Rather, government actors can (and should) regulate billboards without any reference to the content of the message.

A typical highway billboard is 672 square feet (14 feet by 48 feet), and a typical urban road billboard is 300 square feet (12 feet by 25 feet). Amicus International Sign Association Br. 13. So an ordinance could regulate signs based on their size (*e.g.* any sign whose square footage is 300 or more square feet) while remaining entirely content-neutral. *E.g.*, *Reed*, 576 U.S. at 172–74 (listing several of the "ample content-neutral options available to resolve problems with safety and aesthetics"). An ordinance that applied to signs located more than a certain distance away from a building (or within a certain distance of a road), would be equally content-neutral. *Ibid.* As would an ordinance that only applies to outdoor signs on which paid advertising appears. Or signs of a certain size put up on pylons. The City could use any of these methods to regulate billboards without requiring enforcement officials to make highly subjective determinations about a sign's content.

These examples are not merely hypothetical. The Fifth Circuit recently ruled against Reagan National in its suit challenging the City of Cedar Park's denials of Reagan National's applications for new billboards. *Reagan Nat'l Advert. of Austin, Inc.* v. *City of Cedar Park*, 2021 WL 3484698 (5th Cir. Aug. 6, 2021). The court held that Reagan National's billboards were constitutionally prohibited under the city's content-neutral regulation prohibiting all new "pylon signs" (defined as "freestanding signs that are supported by a structure . . . attached to the ground by a . . . footing, with a clearance between the ground and the sign face"). *Id*. at *2. And the states supporting Austin's position admit that other states use "revenue-generation, along with the location of a sign, as a [content-neutral] proxy for whether the sign advertises an off-premises location." Amici States Br. 9. These examples show that local governments can (and do) regulate billboards based on characteristics other than their messages' content. See *City of Ladue* v. *Gilleo*, 512 U.S. 43, 48 (1994) ("governments may regulate the physical characteristics of signs" to protect views, avoid distracted motorists, and the like).

The City of Austin and its amici states do not argue that such alternative content-neutral regulations are impossible, only that they are "more intrusive and more difficult to detect and enforce than simply consulting what the sign says." Amici States Br. 9. But administrative inconvenience is never an excuse for trampling constitutional rights. *Americans for Prosperity Found.*, 141 S. Ct. at 2387 (rejecting the argument that government efficiency and "ease of administration" can ever justify burdening First Amendment rights).

CONCLUSION

The judgment of the court of appeals should be affirmed.

Respectfully submitted,

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