No. 20A128

In the Supreme Court of the United States

JEFFERSON DUNN, COMMISSIONER, ALABAMA DEPARTMENT OF CORRECTIONS,

Applicant,

v.

WILLIE B. SMITH III,

Respondent.

To the Honorable Clarence Thomas, Associate Justice of the United States Supreme Court and Circuit Justice for the Eleventh Circuit

MOTION FOR LEAVE TO FILE BRIEF *AMICUS CURIAE* IN SUPPORT OF RESPONDENT BY THE BECKET FUND FOR RELIGIOUS LIBERTY

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The Becket Fund for Religious Liberty respectfully moves for leave to file a brief *amicus curiae* in opposition to Applicant's Emergency Application to Vacate Injunction of Execution, without 10 days' advance notice to the parties of *Amicus*'s intent to file as ordinarily required. In accordance with the Court's order of April 15, 2020, the proposed brief conforms to the formatting requirements of Rule 33.2.

In light of the expedited nature of the case, it was not feasible to give 10 days' notice, but *Amicus* was nevertheless able to obtain a position on the motion from the parties. All parties have consented to the filing of the *amicus* brief.

The Becket Fund for Religious Liberty is a non-profit, nonpartisan law firm dedicated to protecting the free expression of all religious traditions. Becket has represented agnostics, Buddhists, Christians, Hindus, Jews, Muslims, Santeros, Sikhs, and Zoroastrians, among others, in lawsuits across the country. Becket has also represented numerous prevailing religious parties in this Court. See, *e.g.*, *Hosanna-Tabor Evangelical Lutheran Church & Sch.* v. *EEOC*, 565 U.S. 171 (2012); *Burwell* v. *Hobby Lobby Stores, Inc.*, 573 U.S. 682 (2014); *Zubik* v. *Burwell*, 136 S. Ct. 1557 (2016); *Our Lady of Guadalupe Sch.* v. *Morrissey-Berru*, 140 S. Ct. 2049 (2020); *Little Sisters of the Poor* v. *Pennsylvania*, 140 S. Ct. 2367 (2020).

In particular, Becket has often defended—both as counsel and as *amicus curiae*—prisoners' free exercise of religion. See, *e.g.*, *Murphy* v. *Collier*, 139 S. Ct. 1475 (2019) (amicus brief in support of death row prisoner seeking access to clergy in execution chamber); *Holt* v. *Hobbs*, 574 U.S. 352 (2015) (obtained religious beard accommodation for observant Muslim prisoner); *Rich* v. *Secretary, Fla. Dep't of*

Corr., 716 F.3d 525, 534 (11th Cir. 2013) (obtained kosher diet for observant Jewish prisoner); *Moussazadeh* v. *Texas Dep't of Criminal Justice*, 703 F.3d 781, 784 (5th Cir. 2012) (obtained kosher diet for observant Jewish prisoner); *Benning* v. *Georgia*, 391 F.3d 1299, 1302 (11th Cir. 2004) (obtained kosher diet for observant Jewish prisoner); *Baranowski* v. *Hart*, 486 F.3d 112 (5th Cir. 2007) (kosher accommodation case); *Knight* v. *Thompson*, 723 F.3d 1275 (11th Cir. 2013) (amicus brief in Native American RLUIPA case).

Amicus seeks to file this brief to clarify the law of religious liberty in this fraught area out of concern that the time-compressed nature of this appeal and others like it may obscure the important religious liberty issues at stake. In particular, this brief points to evidence of the ancient practice of providing clergy to the condemned at the moment of death among the states and the federal government and applies that evidence to the strict scrutiny required by RLUIPA.

For the foregoing reasons, proposed *amicus* respectfully requests that the Court grant this unopposed motion to file the attached proposed *amicus* brief and accept it in the format and at the time submitted.

Respectfully submitted.

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TABLE OF CONTENTS

Page

TABLE OF AUTHORITIES

Page(s)

Cases

Other Authorities

INTEREST OF THE *AMICUS CURIAE*[1]

The Becket Fund for Religious Liberty is a non-profit, nonpartisan law firm dedicated to protecting the free expression of all religious traditions. Becket has represented agnostics, Buddhists, Christians, Hindus, Jews, Muslims, Santeros, Sikhs, and Zoroastrians, among others, in lawsuits across the country. Becket has also represented numerous prevailing religious parties in this Court. See, *e.g.*, *Hosanna-Tabor Evangelical Lutheran Church & Sch.* v. *EEOC*, 565 U.S. 171 (2012); *Burwell* v. *Hobby Lobby Stores, Inc.*, 573 U.S. 682 (2014); *Zubik* v. *Burwell*, 136 S. Ct. 1557 (2016); *Our Lady of Guadalupe Sch.* v. *Morrissey-Berru*, 140 S. Ct. 2049 (2020); *Little Sisters of the Poor* v. *Pennsylvania*, 140 S. Ct. 2367 (2020).

In particular, Becket has often defended—both as counsel and as *amicus curiae*—prisoners' free exercise of religion. See, *e.g.*, *Murphy* v. *Collier*, 139 S. Ct. 1475 (2019) (amicus brief in support of death row prisoner seeking access to clergy in execution chamber); *Holt* v. *Hobbs*, 574 U.S. 352 (2015) (obtained religious beard accommodation for observant Muslim prisoner); *Rich* v. *Secretary, Fla. Dep't of Corr.*, 716 F.3d 525, 534 (11th Cir. 2013) (obtained kosher diet for observant Jewish prisoner); *Moussazadeh* v. *Texas Dep't of Crim. Just.*, 703 F.3d 781, 784 (5th Cir. 2012) (obtained kosher diet for observant Jewish prisoner); *Benning* v. *Georgia*, 391 F.3d 1299, 1302 (11th Cir. 2004) (obtained kosher diet for observant Jewish prisoner); *Baranowski* v. *Hart*, 486 F.3d 112 (5th Cir. 2007) (kosher accommodation

[1] No counsel for a party authored this brief in whole or in part, and no person other than *amicus*, its members, or its counsel made a monetary contribution to fund the brief's preparation or submission. This brief has been submitted with an unopposed motion for leave to file it.

case); *Knight* v. *Thompson*, 723 F.3d 1275 (11th Cir. 2013) (amicus brief in Native American RLUIPA case).

As an organization focused solely on religious liberty, Becket takes no position on the administration of the death penalty. Becket instead submits this brief to clarify the law of religious liberty in this fraught area out of concern that the time-compressed nature of this appeal and others like it may obscure the important religious liberty issues at stake. In particular, this brief points to evidence of the ancient practice of providing clergy to the condemned at the moment of death among the states and the federal government and applies that evidence to the strict scrutiny required by RLUIPA.

INTRODUCTION AND SUMMARY OF ARGUMENT

There can be little dispute that having access to clergy in the execution chamber is a key religious exercise for death row prisoners like Smith, and that an outright prohibition is a substantial burden on that exercise. Thus, the narrow question before the Court concerns whether the Eleventh Circuit correctly held that the Alabama Department of Corrections did not meet its burdens of proof and persuasion on its strict scrutiny affirmative defense under RLUIPA. Practical experience shows that Alabama can allow clergy into the death chamber. And because it can, under RLUIPA it must.

Allowing a spiritual advisor in the execution chamber to pray over someone as he passes over into death is an ancient and common practice. The federal government and multiple states have provided spiritual advisors to prisoners in many executions,

including in 13 of the 20 executions carried out nationwide since 2020.[2] Their practices show that what Smith requests can be done. Alabama has not explained why it cannot continue this historical and common practice of offering clergy to prisoners in the death chamber—particularly where Alabama *required* clergy in the chamber until 2019, when it changed that requirement for litigation advantage. Alabama has also failed to explain any security or logistical obstacles to providing the "to the person" relief Smith asks for here: allowing Pastor Wiley specifically to be with him in the death chamber as he passes from this life.

This absence of explanation suggests that instead of following its duty to accommodate religion where possible, Alabama has treated Smith's request for this longstanding religious practice as just another claim to dispose of within the perverse gamesmanship of death penalty litigation. That callous disregard for religious accommodation shows "insufficient appreciation or consideration of the interests at stake." *South Bay United Pentecostal Church* v. *Newsom*, No. 20A136, 2021 WL 406258, at *1 (Feb. 5, 2021) (Roberts, C.J., concurring). This is particularly true where the request itself poses no obstacle to the execution at all if granted.

This Court's decision in *Murphy* v. *Collier* required prison systems to, at a minimum, provide equal treatment for prisoners of different faiths. 139 S. Ct. at 1475. In response, to avoid future equal-treatment claims, Alabama discontinued its decades-old practice of requiring a clergy member in the execution chamber, and

[2] All statistics in this brief regarding the frequency and distribution of executions come from the Death Penalty Information Center. See https://perma.cc/6KL3-HQ4S (option to view "Outcomes of Death Warrants" for a given year).

now bans all clergy from the execution chamber. Dist. Ct. Op. 4-5. This draconian approach "is but another formulation of the 'classic rejoinder of bureaucrats throughout history: If I make an exception for you, I'll have to make one for everybody, so no exceptions.'" *Holt* v. *Hobbs*, 574 U.S. 352, 368 (quoting *Gonzales* v. *O Centro Espirita Beneficente Uniao do Vegetal*, 546 U.S. 418, 436 (2006)). "Leveling down" is not permissible under RLUIPA when a state and its sister governments have been "leveled up" for decades, absent changed circumstances.

Nor need the Court decide these weighty issues within a matter of hours. Other cases are pending in Alabama federal district courts that will allow the lower courts to fully consider the issues in regular order rather than as part of a death penalty rush. See *Burton* v. *Dunn*, No. 2:19-cv-00242 (M.D. Ala.) (filed Apr. 4, 2019) (summary judgment pending); see also *Maisonet* v. *Dunn*, No. 21-cv-00059 (S.D. Ala.) (filed Feb. 4, 2021) (challenge to Alabama's execution policy by prison imam). And allowing more time to decide has already proven helpful in similar cases. See *Gutierrez* v. *Saenz*, 141 S. Ct. 127, 128 (June 16, 2020) and *Gutierrez* v. *Saenz*, No. 19-8695, 2021 WL 231538 at *1 (Jan. 25, 2021).

The district court's initial decision made that careful consideration impossible by mistakenly shifting the burdens of proof and persuasion on Alabama's strict scrutiny affirmative defense from Alabama onto Smith. The Eleventh Circuit was correct to reverse the district court and grant a preliminary injunction requiring Alabama to permit Pastor Wiley into the chamber. Thus, without a record that can support Alabama's strict scrutiny defense, the best course is to uphold the Eleventh

Circuit's injunction and deny this application. Alabama will then have the option to allow Pastor Wiley into the execution chamber or to delay the execution and continue this litigation without the shadow of a looming execution date.[3]

ARGUMENT

I. Alabama has not met its burden of strict scrutiny in denying Smith access to his clergy in the execution chamber.

Under RLUIPA, Alabama is required to meet the "exceptionally demanding" burden of strict scrutiny in denying a prisoner access to clergy in the execution chamber. *Holt*, 574 U.S. at 364. It has not done so.

A. Alabama has not met its burden under *Holt* v. *Hobbs* to show why it cannot follow the practice of other jurisdictions.

In order to meet the least restrictive means standard, Alabama must provide "eviden[ce]," not just argument. *O Centro*, 546 U.S. at 428. If a less restrictive means of achieving its goals is available to the government, the government must "prove that it could not adopt the less restrictive alternative." *Holt*, 574 U.S. at 365. It has not done so here.

This Court has explained that where "many" accommodations have been safely granted by other jurisdictions, that "suggests that [a] Department could satisfy its security concerns through a means less restrictive than denying petitioner the exemption he seeks." *Holt*, 574 U.S. at 368-369. That puts the burden on the government to "at a minimum, offer persuasive reasons why it believes that it must

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[3] *Amicus* takes no position on the pending parallel litigation concerning the method intended to use to execute Smith. *Smith* v. *Commissioner*, *Ala. Dep't of Corr.*, No. 21-10413 (11th Cir.) (stay entered Feb. 10, 2021).

take a different course" from other "well-run institutions"—presumably, due to a relevant distinction. *Ibid.*

In the prison context, the circuit courts frequently allow religious accommodation claims to proceed where a less restrictive approach has been shown practicable by experience—*particularly* where the experience comes from the well-run Federal Bureau of Prisons. See, *e.g.*, *Rich* v. *Secretary, Fla. Dep't of Corr.*, 716 F.3d 525, 534 (11th Cir. 2013) (finding Florida failed to explain what made it "so different from the penal institutions that now provide kosher meals," in particular, the "Federal Bureau of Prisons"); *Spratt* v. *Rhode Island Dep't of Corr.*, 482 F.3d 33, 42 (1st Cir. 2007) ("in the absence of any explanation by [Rhode Island] of significant differences between [its prison] and a federal prison that would render the federal policy unworkable," the Federal Bureau of Prisons' allowance of "some form of inmate preaching" suggested a less restrictive means); *Warsoldier* v. *Woodford*, 418 F.3d 989, 999 (9th Cir. 2005) (California failed to distinguish its interests from that of "the federal government" and three state prison systems that successfully allowed broader freedom for religious grooming practices); cf. *Yellowbear* v. *Lampert*, 741 F.3d 48, 56 n.2 (10th Cir. 2014) (Gorsuch, J.) (drawing on experience of "federal Bureau of Prisons" to address accommodation claim).

Here, the Federal Bureau of Prisons has offered a less restrictive approach that has consistently furthered both religious exercise and prison safety, including in 10 of the 17 executions carried out last year and all 3 executions so far this year. See *supra* note 2. Federal practice allows for the prisoner's clergy of choice in the

chamber at death—the exact accommodation sought by Smith. See Compl. ¶¶ 58-60 (describing federal practice with citations). Yet Alabama has insisted that its current policy of prohibiting *all* chaplains "regardless of faith or employer, from the execution chamber is the least restrictive means" of pursuing its interests in security, Dist. Ct. Op. 30-31—even though it "require[d]" prison chaplains in the chamber for years upon years. *Ray* v. *Commissioner, Ala. Dep't of Corr.*, 915 F.3d 689, 693 (11th Cir. 2019), *stay vacated sub nom. Dunn* v. *Ray*, 139 S. Ct. 661 (2019).

The district court acknowledged that the federal government allows "non-employee spiritual advisors inside the BOP's execution chamber." Dist. Ct. Op. 28 n.19. But in denying the injunction over a lack of "detailed information" on BOP's exact practices, it inverted the strict scrutiny burden. *Ibid.* This is inconsistent with *Holt*. As numerous circuit courts have explained, it is the *State's* burden under strict scrutiny to provide "any explanation" of "significant differences between" its policies and that of "a federal prison" that would make adopting a less restrictive federal policy impractical or ineffective. *Spratt*, 482 F.3d at 42. And this Court has found that not addressing other jurisdictions' tailored practices fails even intermediate scrutiny, see *McCullen* v. *Coakley*, 573 U.S. 464, 490 (2014), much less the strict scrutiny that applies here. *Holt*, 574 U.S. at 369.

It is simply not true that there could not "conceivably be * * * evidence of how free-world spiritual advisors might conduct themselves during an execution." Dist. Ct. Op. 30 n.21 (disagreeing with the contrary conclusions in *Gutierrez* v. *Saenz*, No. 19-cv-185 (S.D. Tex. 2019), ECF No. 124). As the Eleventh Circuit recognized, the

federal government's experience provides direct evidence of how such spiritual advisors have conducted themselves. 11th Cir. Op. at 14 (finding it "troubling that the District Court ignored this highly probative evidence"). The Federal Bureau of Prisons receives the name of the clergyperson two weeks before the execution and conducts a standard background check with no additional training. App. Br. 18-19. There have been no disturbances caused by clergy in federal executions.

Other state prison systems have permitted chamber access far less restrictive than Alabama's policy. An Associated Press article discussing Maryland's 2010 debate on whether to allow clergy of choice—a debate cut short by Maryland's decision to abolish the death penalty—notes "Mississippi" as among a "few states that allow[] an inmate to choose up to two clergy members who can be in the execution chamber," and notes Kansas as also "allow[ing] an inmate to choose a spiritual adviser to be in the execution chamber." *Md. Weighs Allowing Inmates' Own Clergy at Death*, Associated Press (July 19, 2010), https://perma.cc/7EVH-X2CH. And multiple sources suggest "[s]everal states" have allowed at least some prison chaplains in the chamber. See *ibid.* (also listing "Maryland, Georgia, Tennessee and Texas" as among the "[s]everal states" that then allowed prison chaplains in the chamber for the execution); *Death Watch*, Tennessee Department of Correction, https://perma.cc/2GUT-H7QJ (confirming that the "prison chaplain can accompany the offender into the execution chamber at the offender's request"); Deborah W. Denno, *When Legislatures Delegate Death*, 63 Ohio St. L.J. 63, 251 (2002) (reproducing 2001 South Dakota protocol providing that "a minister of the

gospel/priest/clergyman (if requested by the inmate) will be [among] the only people in the execution room," with the warden and inmate). A recent Florida case discusses a chaplain remaining with a prisoner in the "execution chamber." *Valle* v. *State*, 70 So. 3d 530, 543 (Fla. 2011). And at least two states, New Mexico and Colorado, allowed spiritual advisors in the chamber before they abolished the death penalty. 11th Cir. Op. at 20 (Jordan, J., dissenting) (acknowledging this history "absent any indication of problems, undercuts the ADOC's flat-out prohibition to a fair degree"). Colorado's protocol prior to abolishing the death penalty last year provided that "[t]he offender may elect to have the Spiritual Advisor present during the execution." Colorado State Penitentiary Execution Protocol at 26 (rev. May 2013), https://perma.cc/TG3P-DE6L.

With no explanation in the record of why Alabama cannot follow the example of these jurisdictions and especially the Bureau of Prisons, it would be appropriate for the Court to leave undisturbed the Eleventh Circuit's grant of injunction requiring Alabama to allow Pastor Wiley's presence with Smith in the chamber at the moment of death.[4]

B. Alabama has not met its burden of showing that it must specifically exclude Pastor Wiley in order to achieve its interests.

Alabama's affirmative defense also fails because the interests it invokes are too general. Alabama's burden is not just to show why it cannot adopt the policies of other jurisdictions, but also to show why it cannot make an exception to its policy *in*

[4] Alabama leans too heavily on the "abuse of discretion" standard in its application. "A district court by definition abuses its discretion when it makes an error of law." *Koon* v. *United States*, 518 U.S. 81, 100 (1996).

this instance. Strict scrutiny requires that the government must meet its burden "to the person," based on the "specific" practice at issue and the "particular religious claimants." *O Centro*, 546 U.S. at 430-431. As the Senate acknowledged when RLUIPA was passed, "policies grounded on mere speculation, exaggerated fears, or post-hoc rationalizations will not suffice to meet [RLUIPA's] requirements." 146 Cong. Rec. 16,698, 16,699 (2000) (joint statement of Sen. Hatch and Sen. Kennedy on RLUIPA) (quoting S. Rep. No. 111, 103d Cong.; 1st Sess. 10 (1993)). Alabama has provided no direct evidence of security concerns, only vague references to the "risk" of allowing a non-employee into the execution chamber. Dist. Ct. Op. 47.

Courts applying RLUIPA have consistently found that prisons lack a compelling interest in banning something they previously allowed. Claims of compelling interest are undermined "when [a regulation] leaves appreciable damage to that supposedly vital interest unprohibited.'" *Yellowbear*, 741 F.3d at 60 (quoting *Church of the Lukumi Babalu Aye, Inc.* v. *City of Hialeah*, 508 U.S. 520, 547 (1993)) (prison lacked compelling interest in refusing religious but allowing medical lock downs); *Ali* v. *Stephens*, 822 F.3d 776, 793 (5th Cir. 2016) (prison's claims of "disruption caused by four-inch beards are undercut by its change in policy" allowing half-inch beards); *Spratt*, 482 F.3d at 39 (prison lacked compelling interest in banning preaching which it previously allowed); *Washington* v. *Klem*, 497 F.3d 272, 285 (3d Cir. 2007) (prison lacked compelling interest in ten-book limit when it allowed substantial reading material of other types); *Sims* v. *Inch*, 400 F. Supp. 3d 1272, 1277-1278 (N.D. Fla. 2019) (prison's willingness to change its beard policy

undermined its interest in "uniformity").

Of the 35 executions Alabama has conducted in the past 20 years, there are no examples of disruptions caused by clergy in the chamber or anywhere else.[5] Nor has Alabama provided evidence, as explained above, of any disturbances resulting from non-employee chaplains in execution chambers. Unlike family members, clergy are trained to handle end-of-life scenarios and can bolster security by "calming and comforting inmates," *Murphy* v. *Collier*, 942 F.3d 704, 707 (5th Cir. 2019), thus furthering the state's interest in a "serious, dignified, and respectful" proceeding, Dist. Ct. Op. 46.

Here, the available evidence shows that Alabama's exclusion of Pastor Wiley is motivated more by litigation interests than security concerns. Alabama admits that it changed its policy in direct response to this Court's order in *Murphy*. Ala. Opp. to Emergency Mot. at 9; see also *Ray,* 915 F.3d at 694 (Alabama deviated from written prison procedures requiring presence of Christian chaplain in execution chamber). During 35 executions over a 20-year period, Alabama allowed, in fact *required*, the presence of the Holman Correctional Facility chaplain in the execution chamber, allowing him physical contact with each prisoner. Compl. ¶ 6. Yet this never caused a disturbance.

Nor has Alabama given any reason to specifically exclude Pastor Wiley besides a generalized interest in maintaining prison security. While the ADOC's execution

[5] The only examples of clergy posing any sort of problem were outside the execution context; an ADOC-employed chaplain who smuggled contraband, and religious volunteers who were reprimanded for breaking rules. Dist. Ct. Op. 27-28. But Alabama has not alleged that Pastor Wiley has broken any rules or posed any threat during his two years of weekly contact with Smith.

staff need "vetting, training, and demonstrated trustworthiness," Dist. Ct. Op. 26, as a religious advisor visiting a prisoner on death row, Pastor Wiley would already undergo the ADOC's thorough security screening, background check process, and volunteer training. Compl. ¶ 102; State of Alabama Dep't of Corrections, Admin. Reg. No. 462 (2015), https://perma.cc/9BRD-T5KW. Allowing Pastor Wiley into the execution chamber need require no additional effort. In this case, Pastor Wiley is known to the ADOC as Smith's pastor for over two years, Compl. ¶ 25, and Alabama has provided no reason to suspect any security concerns. Thus, Alabama's generic claims of security risk do not justify excluding Pastor Wiley from physically ministering to Smith at the spiritually fraught moment he passes from life to death.

* * *

Alabama's stated interest in security "does not permit * * * unquestioning deference" to its policies or prevent courts from applying the "rigorous standard" required by RLUIPA. *Holt*, 574 U.S. at 364. The district court did not apply that rigorous standard, but the Eleventh Circuit corrected the error. This Court therefore need not intervene.

CONCLUSION

This Court should deny the application.

Respectfully submitted.

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