

No. 23-1002

IN THE

Supreme Court of the United States

TONY R. HEWITT,

Petitioner,

v.

UNITED STATES,

Respondent.

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

**BRIEF OF THE NATIONAL ASSOCIATION OF
CRIMINAL DEFENSE LAWYERS AS *AMICUS*
CURIAE IN SUPPORT OF PETITIONER**

Jeffrey T. Green
Co-Chair Amicus
Committee

NATIONAL ASSOCIATION OF
CRIMINAL DEFENSE
LAWYERS
1600 L Street, NW
Washington, DC 20036
(202) 872-8600

Kevin Poloncarz

Counsel of Record

Julia Barrero

Jared Gilmour

COVINGTON & BURLING LLP
415 Mission St, 54th Floor
San Francisco, CA 94105
(415) 591-7070
kpoloncarz@cov.com

Counsel for Amicus Curiae

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INTERESTS OF *AMICUS CURIAE*¹

The National Association of Criminal Defense Lawyers (NACDL) is a nonprofit voluntary professional bar association that works on behalf of criminal defense attorneys to ensure justice and due process for those accused of crime or misconduct. NACDL was founded in 1958. It has a nationwide membership of many thousands of direct members, and up to 40,000 with affiliates. NACDL's members include private criminal defense lawyers, public defenders, military defense counsel, law professors, and judges. NACDL is the only nationwide professional bar association for public defenders and private criminal defense lawyers. NACDL is dedicated to advancing the proper, efficient, and just administration of justice. NACDL files numerous *amicus* briefs each year in the U.S. Supreme Court and other federal and state courts, seeking to provide *amicus* assistance in cases that present issues of broad importance to criminal defendants, criminal defense lawyers, and the criminal justice system as a whole. NACDL's members represent many individuals seeking relief under the First Step Act, and therefore, NACDL has a keen interest in the application of Sections 401 and 403.

¹ In accordance with Rule 37.2, all counsel of record received timely notification of *amicus*'s intent to file this brief. Pursuant to Supreme Court Rule 37.6, *amicus* certifies that no counsel for any party authored this brief in whole or in part, and that no party or counsel other than the *amicus curiae* and their counsel made a monetary contribution intended to fund the preparation or submission of this brief.

INTRODUCTION AND SUMMARY OF ARGUMENT

The First Step Act of 2018, Pub. L. No. 115-391, 132 Stat. 5194 (“FSA”), was a landmark, bipartisan reform to the federal criminal justice system. Its sentencing amendments—Sections 401 and 403—played a critical role in the law’s passage. The question presented is whether Section 403’s sentence reductions for firearm offenses apply to defendants whose pre-enactment sentences are vacated and who are then resentenced post-enactment. But resolving this question will also decide how Section 401 should be read. Section 401 modified sentence enhancements for drug offenses—the largest category of federal crimes. These Section 401 reforms sought to reign in a system of disproportionate, arbitrary punishments. Under the old system, a difference of twelve years in prison could hinge on inconsistently applied, racially disparate prosecutorial discretion that varied widely from district to district. This Court has already interpreted portions of the First Step Act several times, and the provisions at issue here are equally pressing. By granting certiorari in this case, the Court will resolve the now-entrenched circuit split undermining Congress’ reforms. As a result, this Court can transform the lives of those facing the draconian sentences that Sections 401 and 403 sought to change.

ARGUMENT

I. Congress passed overdue, bipartisan sentencing reform in the First Step Act, impacting tens of thousands of lives.

1. The First Step Act is a sweeping criminal justice reform law, remarkable in its breadth and depth of support. Congress voted to pass the Act in 2018 by overwhelming margins: 87–12 in the Senate and 358–36 in the House of Representatives. 164 Cong. Rec. S7,781 (daily ed. Dec. 18, 2018); 164 Cong. Rec. H10,430 (daily ed. Dec. 20, 2018). At its signing, President Donald J. Trump hailed the Act as “an incredible moment” for criminal justice reform, and noted the law’s “unheard of” level of bipartisan support.² The Act included three major parts: (1) sentencing reform through changes to the penalties for some federal crimes; (2) correctional reform through creation of a Bureau of Prisons (BOP) risk and needs assessment system; and (3) reauthorization of the Second Chance Act of 2007.³

2. The FSA addressed the increasingly obvious flaws in federal sentencing. “Inflexible mandatory minimum sentences” for nonviolent offenders had triggered “an explosion in our Federal prisons,” while failing to “deter drug use or drug crime.” 164 Cong. Rec. S7,644 (daily ed. Dec. 17, 2018) (statement of Sen. Durbin). Operating under rigid mandatory

² Remarks by President Trump at Signing Ceremony for S. 756, the “First Step Act of 2018” and H.R. 6964, the “Juvenile Justice Reform Act of 2018,” 2018 WL 6715859, at *16 (Dec. 21, 2018).

³ Congressional Rsrch. Serv., *The First Step Act of 2018: An Overview* 1 (Mar. 4, 2019), <https://perma.cc/UJR6-SHTJ>.

minimums, judges could not “distinguish between drug kingpins . . . and lower level offenders.” *Id.* As a result, federal sentencing laws had “created racially discriminatory outcomes and increased overcrowding and costs.”⁴

By enacting the First Step Act, “Congress sought to recalibrate its approach.” *Pulsifer v. United States*, No. 22-340, slip op. at 1, 601 U.S. ____ (2024) (Gorsuch, J., dissenting). The law was a “historic” example of Congress “putting [its] words into action” after “years talking about reducing crime, enacting fair sentencing laws, and restoring lives.” 164 Cong. Rec. H10,364 (daily ed. Dec. 20, 2018) (statement of Rep. Sensenbrenner). The law’s passage showcased bipartisan legislating “on a scale not often seen in Washington these days.” 164 Cong. Rec. S7,839 (daily ed. Dec. 19, 2018) (statement of Sen. Grassley). Senator Charles E. Grassley noted that Congress has rarely had legislation before it with “such diverse groups of people and organizations that support the bill.” 164 Cong. Rec. S7,778 (daily ed. Dec. 18, 2018). The coalition behind the First Step Act ranged from the American Civil Liberties Union to the Fraternal Order of Police and the Association of Prosecuting Attorneys. 164 Cong. Rec. S7,839 (daily ed. Dec. 19, 2018) (statement of Sen. Grassley). Senator Patrick Leahy called the bill “not just bipartisan; it is nearly nonpartisan.” 164 Cong. Rec. S7,749 (daily ed. Dec. 18, 2018). As President Trump said from the Oval

⁴ *President Donald J. Trump Calls on Congress to Pass the FIRST STEP Act*, WhiteHouse.gov (Nov. 14, 2018), <https://perma.cc/H6SW-Q9VF>.

Office, its supporters included “a cross-section of everybody in our country.”⁵

The sentencing overhaul was a feature of the First Step Act’s bipartisan appeal, not a bug. According to the lead sponsors of the bill, without the sentencing reforms, “much of the Act’s support would have fallen away.” Brief for United States Senators Richard J. Durbin et al. as *Amici Curiae* Supporting Defendant-Appellant 1–2, *Terry v. United States*, 141 S. Ct. 1858 (2021) (No. 20-5904). Indeed, “[t]he Act might not have passed at all.” *Id.* at 2. Today, the Act’s sentencing reforms promise “more individuals the chance to avoid one-size-fits-all mandatory minimums.” *Pulsifer*, slip op. at 1 (Gorsuch, J., dissenting). And one of the chief provisions among the law’s “array” of reforms: “It narrowed the circumstances under which a court could ‘stack’ certain mandatory minimums on top of one another.” *Id.* (citing First Step Act § 403(a)).

Recidivism data confirm that the sentencing modifications are working. The architects of the First Step Act aimed to “reform the federal prison system so that those exiting the system do not return.”⁶ Overall, around 45% of released federal offenders are

⁵ Remarks by President Trump at Signing Ceremony for S. 756, the “First Step Act of 2018” and H.R. 6964, the “Juvenile Justice Reform Act of 2018,” 2018 WL 6715859, at *2 (Dec. 21, 2018).

⁶ U.S. Dep’t of Justice, *The First Step Act of 2018: Risk and Needs Assessment System* vii (2019), <https://perma.cc/U3E6-SDUL>.

re-arrested or return to prison within three years.⁷ But among the approximately 30,000 individuals granted an expedited release under the First Step Act, only 12% have been rearrested or reincarcerated.⁸ Analysis from the nonpartisan think tank Council on Criminal Justice finds that people released under the FSA reforms since its passage have a 37% lower recidivism rate compared with similarly situated individuals released from federal prisons before the law.⁹ The FSA's interventions have reduced people's time in prison without sacrificing public safety.

3. This Court and the courts of appeals have confirmed that the Act's interpretation warrants attention. This very term in *Pulsifer v. United States*, the Court stressed the First Step Act's importance, calling it a "significant sentencing reform law." *Pulsifer*, slip op. at 26. The Court also emphasized the need to interpret the FSA's provisions consistently. *Id.* (explaining that this Court granted certiorari to settle a circuit split by determining when a defendant is eligible for the Act's safety-valve relief). The Sixth Circuit has recognized that the First Step Act "is the product of a remarkable bipartisan effort to remedy past overzealous use of mandatory-minimum

⁷ U.S. Gov't Accountability Off., *Federal Prisons: Bureau of Prisons Should Improve Efforts to Implement its Risk and Needs Assessment System* 1 (Mar. 20, 2023), <https://perma.cc/YP8W-7J3M>.

⁸ U.S. Dep't of Justice, *First Step Act Annual Report* 41 (Apr. 2023), <https://perma.cc/MV79-2R7S>.

⁹ *New CCJ Analysis Estimates First Step Act Releases Have Lower Recidivism Rates, Arrests*, Council on Criminal Justice (Aug. 22, 2023), <https://perma.cc/9HJE-ZFMC>.

sentences and harsh sentences for drug-offenders.” *United States v. Henry*, 983 F.3d 214, 218 (6th Cir. 2020). The Seventh Circuit has described the Act as a “historic, bipartisan attempt by Congress to take the lessons of the past and to formulate a new sentencing policy for the United States.” *United States v. Uriarte*, 975 F.3d 596, 605 (7th Cir. 2020). And this Court has already considered a handful of cases involving the Act in the five years since its passage. *See, e.g., Pulsifer*, slip. op.; *Concepcion v. United States*, 142 S. Ct. 2389 (2022); *Terry v. United States*, 141 S. Ct. 1858 (2021). Construing the Act’s language clearly merits the Court’s time—particularly in the face of a hardened circuit conflict like this.

II. Taking up the question presented allows this Court to also interpret Section 401(c)’s sentence reforms for drug offenses.

The petition presents the question of whether Section 403 applies to vacated sentences. Petitioner has explained the importance of this provision, which eliminates the practice of “stacking” firearm offenses. But interpreting Section 403 also impacts those with vacated sentences under Section 401, which reformed sentence enhancements for drug offenders. *United States v. Bethea*, 841 F. App’x 544, 548 n.5 (4th Cir. 2021) (Sections 401(c) and 403(b) construed to have same meaning). Further, the Fifth Circuit has now joined the Sixth in a reading of these provisions that conflicts with the Ninth and the Third Circuits. *See* Pet. 6–9. Thus, the split has deepened since this Court denied review of the same question presented in *Carpenter v. United States* (No. 23-531). Mr. Hewitt’s case presents the Court with the opportunity

to both reconcile a circuit split *and* settle the meaning of two crucial provisions in the First Step Act’s sentencing reforms.

A. Drug offenders represent the largest category of federal prisoners.

More federal inmates are in prison for drug offenses than any other category of crime. In fact, twice as many individuals are in our federal prisons for drug crimes (more than 44%) than for the next largest category: crimes involving weapons, explosives, and arson (about 22%).¹⁰ Sixty-seven percent of drug offenders were convicted of an offense carrying a mandatory minimum penalty and almost half of those individuals remained subject to that penalty at sentencing.¹¹ On top of that mandatory minimum, an individual may face a sentence enhancement based on past offenses. A 2018 U.S. Sentencing Commission study found that approximately one third of drug offenders qualified for sentence enhancements—more than 6,000 people.¹²

¹⁰ Federal Bureau of Prisons, *Offenses* (Apr. 6, 2024), <https://perma.cc/A7RR-39X7>.

¹¹ U.S. Sentencing Comm’n, *Quick Facts on Mandatory Minimum Penalties* 2 (2022), <https://perma.cc/4SNE-25VP>.

¹² U.S. Sentencing Comm’n, *Report-At-A-Glance: Federal Drug Recidivism Enhancements* 1 (2018), <https://perma.cc/XWG9-5JW8>.

B. Section 401 mitigated the frequency and severity of sentence enhancements for drug offenses, helping to remedy the harsh and arbitrary application of these penalties.

1. Section 401 changed the mandatory-minimum sentencing enhancements under the Controlled Substances Act, 21 U.S.C. § 801 *et seq.*, and the Controlled Substances Import and Export Act, 21 U.S.C. § 951 *et seq.* Prosecutors may seek sentence enhancements based on a defendant’s prior convictions by following the proceedings described in 21 U.S.C. § 851.¹³ Sentencing enhancements under both laws are therefore known as “851 enhancements.”¹⁴

2. Prior to the First Step Act, 851 enhancements forced judges to levy harsh penalties on drug offenders. The enhancement for a defendant with a single qualifying drug offense was a mandatory minimum of twenty years. 21 U.S.C. § 841(b) (amended 2018). If the defendant had two or more qualifying offenses, that mandatory minimum became life. *Id.* Moreover, the old law set a low bar for what constituted a qualifying drug offense—any drug crime punishable by more than a year’s imprisonment sufficed, including simple possession. *See id.* § 802(44)

¹³ Section 962 of the Controlled Substances Act incorporates by reference the procedures stated in 21 U.S.C. § 851, making Section 851 the operative provision across both statutes. 21 U.S.C. § 962.

¹⁴ *See, e.g.*, U.S. Sentencing Comm’n, *Application and Impact of Section 851 Enhancements* (July 2018), <https://perma.cc/7NXA-4ZLP>.

(defining a “felony drug offense” as one punishable by imprisonment for more than one year). This definition swept in defendants who were sentenced to less than a year, released before a year was up, or were sentenced to probation alone. An individual who had been convicted of one prior felony drug offense twenty years earlier could get the same sentence enhancement as someone who had been found guilty of the same offense only one year ago. The system treated all felony drug offenders identically.

These sentence enhancements were not only draconian; they were also inconsistently applied. A 2011 study on mandatory minimum sentences found that in most judicial districts, between one quarter and one half of all drug offenders qualified for a sentence enhancement; in a third of districts, the rate was as high as 50% to 75%.¹⁵ The number of defendants actually sentenced with enhancements was lower, but worryingly, the Commission found “significant variation in the manner in which the enhancement provision was applied.” 2011 Report, *supra*, at 260. For example, in six districts more than 75% of eligible defendants received the enhancement, but in eight districts, no eligible offenders received it. *Id.* at 260–61. Based on these findings, the

¹⁵ U.S. Sentencing Comm’n, *2011 Report to the Congress: Mandatory Minimum Penalties in the Federal Criminal Justice System* 260 (2011), <https://perma.cc/DT3U-D3RR> [hereinafter 2011 Report].

Commission recommended that Congress “reassess the severity and scope of 851 enhancements.”¹⁶

In early 2018, the Commission undertook a study wholly focused on 851 enhancements. The report found that, although almost a third of drug offenders qualified for sentence enhancements, application of the enhancements continued to vary wildly, “ranging from five districts in which an 851 enhancement was sought against more than 50% of eligible drug trafficking offenders to nineteen districts in which the enhancement was not sought against any of the eligible offenders.”¹⁷ Further, the report unearthed troubling racial disparities. Black offenders accounted for 42% of those who qualified for sentence enhancements but made up a staggering 58% of those who received enhancements. 2018 Report, *supra*, at 34 tbl.5. By contrast, 26% of white offenders were eligible for enhancements, yet only 24% received them. *Id.*

Defendants suffered major consequences if a court sentenced them under the enhanced sentencing regime. The Commission found that, if a prosecutor chose not to seek an enhanced sentence, offenders otherwise eligible for the enhancement received an average sentence of seven years. *Id.* at 7. By contrast, when the prosecutor did seek the enhancement, it

¹⁶ U.S. Sentencing Comm’n, *Application and Impact of Section 851 Enhancements: Key Findings* (July 2018), <https://perma.cc/RL7S-BV84>.

¹⁷ U.S. Sentencing Comm’n, *Application and Impact of 21 U.S.C. § 851: Enhanced Penalties for Federal Drug Trafficking Offenders* 6 (July 2018), <https://perma.cc/AKH6-7WTS> [hereinafter 2018 Report].

added another twelve years to the sentence on average, more than doubling the individual's time in prison. *Id.* In other words, similarly situated defendants were receiving sentences that varied by more than a decade—seven years for some and nineteen years for others. The data depicted an arbitrary system, where punishment turned not on the actions of the defendant, but on the prosecutor and district in which the defendant was sentenced.

3. Section 401 of the First Step Act sought to mitigate the severity of 851 enhancements in two ways. *First*, the provision restricted which crimes qualified as predicates for most mandatory-minimum sentences. Only drug trafficking offenses for which the defendant had served more than twelve months of imprisonment now qualified. First Step Act of 2018, Pub. L. No. 115-391, § 401(a)(1), 132 Stat. 5194, 5221, 21 U.S.C. § 802(57). Additionally, offenses that were more than fifteen years old could no longer support an enhanced sentence. *Id.* *Second*, Section 401 reduced the severity of sentence enhancements. For example, for a defendant convicted under § 841(b)(1)(A) who has a single prior qualifying offense, the mandatory minimum enhancement dropped from twenty to fifteen years. *Id.* § 401(a)(2)(A)(i), 21 U.S.C. § 841(b)(1)(A). If the same defendant had two prior qualifying offenses, the mandatory minimum enhancement changed from life in prison to twenty-five years. *Id.* § 401(a)(2)(A)(ii), 21 U.S.C. § 841(b)(1)(A). Because of these changes, defendants with two predicate offenses sentenced today have the chance to return home to their families instead of spending their lives in prison.

The amendments made an immediate impact. Drug offenders receiving enhanced penalties dropped from 1,001 in 2018 to 849 in 2019.¹⁸ In 2018, the twenty-year enhanced mandatory minimum had been applied to 321 offenders. *Id.* In 2019, the revised fifteen-year minimum was applied to 219 people. *Id.* In 2018, enhanced sentencing consigned forty-two drug offenders to life in prison. *Id.* In 2019, that number dropped to eleven. *Id.*

4. By narrowing the pool of eligible defendants and lessening the length of enhanced sentences, Section 401 of the First Step Act mitigated the system's worst excesses. Still, the harshness of the old regime follows defendants who were originally sentenced before the Act's passage and whose sentences have now been vacated. With the courts of appeals openly at odds, only geography dictates whether an individual will benefit from the FSA's changes. For the typical defendant eligible for an 851 sentence enhancement, the difference amounts to years, if not *decades*, of extra time in prison.

The FSA's sentencing modifications garnered bipartisan support and have transformed numerous lives over the last five years. Yet the entrenched circuit conflict prevents Sections 401 and 403 from applying nationwide. It is time for this Court to take up the question presented and construe the law's reforms as Congress intended.

¹⁸ See U.S. Sentencing Comm'n, *The First Step Act of 2018: One Year of Implementation* (Aug. 2020), <https://perma.cc/QMZ5-YKC7>.

CONCLUSION

For the reasons set forth above, this Court should grant certiorari.

Respectfully submitted,

Jeffrey T. Green
Co-Chair Amicus
Committee
NATIONAL ASSOCIATION
OF CRIMINAL DEFENSE
LAWYERS
1600 L Street, NW
Washington, DC 20036
(202) 872-8600

Kevin Poloncarz
Counsel of Record
Julia Barrero
Jared Gilmour
COVINGTON & BURLING LLP
415 Mission St, 54th Floor
San Francisco, CA 94105
(415) 591-7070
kpoloncarz@cov.com

Counsel for Amicus Curiae

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