No. 24-1046

IN THE

Supreme Court of the United States

JASON WOLFORD, *et al.*,

Petitioners,

v.

ANNE E. LOPEZ, ATTORNEY GENERAL OF HAWAII,

Respondent.

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

BRIEF OF THE NATIONAL ASSOCIATION FOR GUN RIGHTS AS *AMICUS CURIAE* IN SUPPORT OF PETITIONERS

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INTEREST OF AMICUS

The right to keep and bear arms is a fundamental right that existed prior to the Constitution. The right is not in any sense granted by the Constitution. Nor does it depend on the Constitution for its existence. Rather, the Second Amendment declares that the pre-existing "right of the people to keep and bear Arms shall not be infringed." The National Association for Gun Rights ("NAGR")[1] is a nonprofit membership and donor-supported organization with hundreds of thousands of members nationwide. The sole reason for NAGR's existence is to defend American citizens' right to keep and bear arms. In pursuit of this goal, NAGR has filed numerous lawsuits seeking to uphold Americans' Second Amendment rights. NAGR has a strong interest in this case because the guidance the Court will provide in its resolution of this matter will have a major impact on NAGR's ongoing litigation efforts in support of Americans' fundamental right to keep and bear arms.

SUMMARY OF ARGUMENT

Non-originalists have been relentless in their efforts to cabin *D.C. v. Heller*, 554 U.S. 570 (2008), as much as possible to its specific facts. Their latest tactic involves suggesting that 1868 (as opposed to 1791) is the proper time

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1. No counsel for a party authored this brief in whole or in part, and no entity or person, other than amicus curiae, its members, and its counsel, made a monetary contribution intended to fund the preparation or submission of this brief. Amicus curiae provided timely notice to Petitioner and notice to Respondent. Respondent does not object to the filing of this brief.

period for judging the scope of the Second Amendment right. The Court should resist this effort, because in numerous cases it has held that enumerated rights have the scope understood by the people who ratified the Bill of Rights in 1791.

This issue arises from a passage in *New York State Rifle & Pistol Ass'n, Inc. v. Bruen*, 597 U.S. 1 (2022), in which the Court acknowledged a scholarly debate regarding the proper time period. But in *McDonald v. City of Chicago, Ill.*, 561 U.S. 742 (2010), the Court made clear that the existence or a scholarly debate has no bearing on the actual status of the substantive law. In *McDonald*, while acknowledging such a debate, the Court rejected the conclusions of the scholars because they were inconsistent with this Court's precedents. The Court should do the same thing in this case.

The Court should reject the Ninth Circuit's approach to this case because it would lead to two radically different Second Amendments—one applicable to the states and the other applicable to the federal government—existing at the same time. Finally, the whole point of the originalist method of constitutional interpretation is that the text had a particular meaning in 1791, that meaning does not change, and that meaning binds this Court.

ARGUMENT

A. The Fight to Hold *Heller* Down Continues

Progressive constitutional jurisprudence is, to say the least, odd. Take, for example, progressives' attitudes

toward the fabricated[2] right to abortion and the actual right to keep and bear arms. The Constitution does not refer to abortion, and no such right is implicitly protected by any constitutional provision.[3] In contrast, the Constitution specifically enumerates the right to keep and bear arms and unambiguously states that it shall not be infringed.[4] Yet, progressives treat the fabricated right to abortion as a "super-right"[5] that is more sacrosanct than rights actually enumerated in the text. At the same time, they insist that the actually enumerated right to keep and bear arms does not really exist in any meaningful sense.[6]

From this, we can conclude that the text, history, and structure of the Constitution are simply irrelevant to a certain kind of judge if they stand in the way of achieving the judge's preferred policy goals. If, to achieve

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2. *Dobbs v. Jackson Women's Health Org.*, 597 U.S. 215, 336 (2022) (Thomas, J., concurring).

3. *Dobbs*, 597 U.S. at 231.

4. U.S. Const. amend. II.

5. Alyson M. Cox & O. Carter Snead, "*Grievously and Egregiously Wrong": American Abortion Jurisprudence*, 26 Tex. Rev. L. & Pol. 1, 22 (2021) (quoting *Planned Parenthood of Ind. & Ky., Inc.*, 888 F.3d at 311 (Manion, J., concurring in the judgment in part and dissenting in part)). As the Court noted in *Dobbs*, "Members of this Court have repeatedly lamented that no legal rule or doctrine is safe from ad hoc nullification by this Court when an occasion for its application arises in a case involving state regulation of abortion." *Id.*, 597 U.S. at 286 (internal citations and quotation marks omitted).

6. *D.C. v. Heller*, 554 U.S. 570, 637 (2008) (Stevens, J., dissenting) (Constitution does not "limit[] any legislature's authority to regulate private civilian uses of firearms.").

those policy goals, he must choose between wielding "raw judicial power"[7] and adhering to the actual Constitution he purports to be interpreting, well, so much the worse for the actual Constitution. Professor Ely famously captured this attitude when he remarked that *Roe* was not bad because it was bad constitutional law; it was bad "because it [was] *not* constitutional law [at all] and [gave] almost no sense of an obligation to try to be." John Hart Ely, *The Wages of Crying Wolf: A Comment on Roe v. Wade*, 82 Yale L.J. 920, 947 (1973) (emphasis in the original).

In *Heller*, the non-originalists lost the fight to drum the Second Amendment out of the Constitution. Having lost that fight, they have spent the ensuing 17 years frenetically working to undermine *Heller* as much as possible. And in the Ninth Circuit especially, they succeeded famously. See *United States v. Rahimi*, 602 U.S. 680, 712 (2024) (Gorsuch, J., concurring) (noting that post-*Heller*, in the Ninth Circuit, the government had an unblemished 50-0 record defending against Second Amendment challenges). This is hardly surprising given the long history of governments trying to confine the right to keep and bear arms "within the narrowest limits." *Rahimi*, 602 U.S. at 709 (Gorsuch, J., concurring) (quoting 1 Blackstone's Commentaries, Editor's App. 300 (St. George Tucker ed. 1803)).

The latest tactic that anti-Second Amendment forces have employed to undermine the right to keep and bear arms is to argue that 1868 (as opposed to 1791) is the proper time period for judging the scope of the right. Mark W. Smith, '*Not All History Is Created Equal': In*

7. *Roe v. Wade*, 410 U.S. 179, 222 (1973) (White, J. dissenting).

the Post-Bruen World, the Critical Period for Historical Analogues Is when the Second Amendment Was Ratified in 1791, and not 1868, SSRN (Oct. 1, 2022) (manuscript, at 4), http://dx.doi.org/10.2139/ssrn.4248297 (hereinafter "Smith"). They are doing this because there were more laws on the books in 1868 and thus more "opportunities to find historical 'analogues' to restrict individual rights." *Id*. As noted in the Petition, there is a circuit split as to whether it is permissible for courts to place primary reliance on Reconstruction-Era and later laws to uphold modern gun control regulations. Pet. 10. It is vital that the Court resolve this split at the earliest possible time, because it has significant—indeed epochal—ramifications not only in the specific context of Second Amendment cases such as this one, but also in a host of other constitutional contexts. Indeed, if the Ninth Circuit's approach to this issue were ever adopted by this Court, it "would revolutionize not only Second Amendment law, but also the Court's entire Bill of Rights jurisprudence." Smith, *supra*, at 1.

B. Acknowledging a Debate About What the Law Should be is Not the Same as Declaring What the Law Actually is

The controversy over the proper time period has its roots in a passage from *Bruen* in which the Court stated: "We . . . acknowledge that there is an ongoing scholarly debate on whether courts *should* primarily rely on the prevailing understanding of an individual right when the Fourteenth Amendment was ratified in 1868 when defining its scope." *Id*. at 37 (emphasis added). The key word in that sentence is "should." There is no legitimate debate, scholarly or otherwise, regarding whether this

Court has *in fact* relied on the prevailing understanding of an individual right in 1868 when defining its scope. It has not. Indeed, *Bruen* itself made this clear when the Court wrote "we have generally assumed that the scope of the protection applicable to the Federal Government and States is pegged to the public understanding of the right when the Bill of Rights was adopted in 1791." *Id.*

Acknowledging a scholarly debate about what the law should be has no bearing on what the law actually is. This was made plain in *McDonald*, another case that acknowledged a scholarly debate and then rejected the conclusions of the scholars. There, the petitioner argued that the *Slaughter–House Cases*, 16 Wall. 36, 21 L.Ed. 394 (1873), which narrowly interpreted the Privileges and Immunities Clause of the Fourteenth Amendment, were wrongly decided and should be overruled. The Court acknowledged a scholarly debate concerning whether the *Slaughter–House Cases* were wrongly decided when it wrote:

> Today, many legal scholars dispute the correctness of the narrow *Slaughter–House* interpretation. See, e.g., *Saenz v. Roe*, 526 U.S. 489, 522, n. 1, 527, 119 S.Ct. 1518, 143 L.Ed.2d 689 (1999) (THOMAS, J., dissenting) (scholars of the Fourteenth Amendment agree "that the Clause does not mean what the Court said it meant in 1873"); Amar, *Substance and Method in the Year 2000*, 28 Pepperdine L.Rev. 601, 631, n. 178 (2001) ("Virtually no serious modern scholar—left, right, and center—thinks that this [interpretation] is a plausible reading of the Amendment"); Brief for Constitutional

> Law Professors as *Amici Curiae* 33 (claiming an "overwhelming consensus among leading constitutional scholars" that the opinion is "egregiously wrong"); C. Black, *A New Birth of Freedom* 74–75 (1997).

McDonald, 561 U.S. at 756–57.

Having acknowledged the scholarly debate, the Court declined to accept the conclusions of the scholars and upheld its precedent. The Court wrote:

> We see no need to reconsider that interpretation [of the Privileges or Immunities Clause] here. For many decades, the question of the rights protected by the Fourteenth Amendment against state infringement has been analyzed under the Due Process Clause of that Amendment and not under the Privileges or Immunities Clause. We therefore decline to disturb the *Slaughter–House* holding.

Id. at 758.

Similarly, when *Bruen* acknowledged a scholarly debate, it was not calling into doubt the status of its precedents holding that the scope of the protection afforded by a right is "pegged to the public understanding of the right when the Bill of Rights was adopted in 1791." *Id.*, 597 U.S. at 37. As in *McDonald*, it was merely pointing out that some scholars believe that these precedents should be overruled so that in state cases the scope of the right is pegged to the public understanding of the right when the Fourteenth Amendment was adopted in 1868.

In this case, the Ninth Circuit seems to have failed to grasp this important distinction. The circuit court wrote: "It bears emphasizing that the laws at issue here are state laws. The Second Amendment applies to the States because of the Fourteenth Amendment's ratification in 1868. . . . [and thus] we look to the understanding of the right to bear arms *both* at the time of the ratification of the Second Amendment in 1791 *and* at the time of the ratification of the Fourteenth Amendment in 1868." *Wolford v. Lopez*, 116 F.4th 959, 980 (9th Cir. 2024) (emphasis in original). The circuit court compounded its error when it cited *McDonald*. *Id.* (citing *McDonald*, 561 U.S. at 750, 130 S.Ct. 3020). This is anomalous because *McDonald* held precisely the opposite:

> Finally, the Court abandoned "the notion that the Fourteenth Amendment applies to the States only a watered-down, subjective version of the individual guarantees of the Bill of Rights," stating that it would be "incongruous" to apply different standards "depending on whether the claim was asserted in a state or federal court." *Malloy*, 378 U.S., at 10–11, 84 S.Ct. 1489 (internal quotation marks omitted). Instead, *the Court decisively held that incorporated Bill of Rights protections "are all to be enforced against the States under the Fourteenth Amendment according to the same standards that protect those personal rights against federal encroachment*."

Id., 561 U.S. at 765 (emphasis added).

As set forth in more detail below, *McDonald* is not the only precedent the lower court failed to apply properly. Indeed, the court's holding is contrary to the overwhelming thrust of this Court's precedents.

C. The Ninth Circuit's Approach Leads to Two Radically Different Second Amendments Existing at the Same Time

It has been a fundamental principle of Bill of Rights jurisprudence that the Court does not apply one version of an enumerated right against a potential federal infringement and an altogether different version against a potential state or local infringement. *Smith*, 7. "Thus, if a Bill of Rights protection is incorporated, there is *no daylight* between the federal and state conduct it prohibits or requires." *Timbs v. Indiana*, 586 U.S. 146, 150 (2019) (emphasis added).

Lara v. Comm'r Pennsylvania State Police, 125 F.4th 428 (3d Cir. 2025), illustrates the importance of this foundational "no daylight" principle. There, the government was not able to identify a single Founding-era regulation restricting the right of 18-to-20-year-olds to keep and bear firearms. *Id.*, 125 F.4th at 439. Yet, the government said it was able to identify "dozens" of such laws from the Reconstruction era. *Id.* The court wrote:

> But the [government] has forced the issue here by insisting that the laws at the time Americans adopted the Fourteenth Amendment would have allowed states to forbid people in the Appellants' position from having firearms, while at the same time providing no evidence of

> a tradition of disarming 18-to-20-year-olds at the time of the founding. By maintaining that there is ample evidence from 1868 to support the Appellants' disarmament, but offering none from the founding era, the [government] is claiming that there is a difference between how each generation understood the right, so we must pick between the two timeframes.

Id., 125 F.4th at 439, n. 17.

The Third Circuit resolved the matter by holding that the meaning of the Second Amendment "is fixed according to the understandings of those who ratified it[.]" *Id.*, 125 F.4th at 441 (quoting *Bruen*, 597 U.S. at 28). The court further held that Founding-era laws reflect the principle that 18-to-20-year-olds are entitled to exercise the right to bear arms. *Id.* Thus, it rejected the government's proposed historical analogues from the mid-to-late nineteenth century that suggested "the exact opposite." *Id.*

The point of this is obvious. In *Lara*, the circuit court was confronted with a situation where the public understanding of the scope of the right to keep and bear arms in 1868 seemed to be radically different from the public understanding in 1791. Thus, if the court had held that the former understanding controlled for challenges to state laws while the latter applied to challenges to federal laws, it would have created a situation where two radically different Second Amendments exist at the same time. Under *McDonald*, this plainly will not do. As noted above, there the Court noted that it has "decisively held that incorporated Bill of Rights protections 'are all to be enforced against the States under the Fourteenth

Amendment according to the same standards that protect those personal rights against federal encroachment.'" *Id.*, 561 U.S. at 765. *Lara* did the only thing it could do while respecting this precedent and held that the 1791 standard controlled. *Lara's* decision to peg 1791 as the key timeframe is consistent with numerous precedents from this Court.

D. The ***Text*** of the Second Amendment Never Changed

It is prudent to reflect on first principles from time to time. In *Marbury v. Madison*, 5 U.S. 137, 2 L. Ed. 60 (1803), Chief Justice Marshall wrote:

> The powers of the legislature are defined, and limited; and that those limits may not be mistaken, or forgotten, the constitution is *written*. To what purpose are powers limited, and to what purpose is that limitation committed to *writing*, if these limits may, at any time, be passed by those intended to be restrained? The distinction, between a government with limited and unlimited powers, is abolished, if those limits do not confine the persons on whom they are imposed, and if acts prohibited and acts allowed, are of equal obligation. It is a proposition too plain to be contested, that the constitution controls any legislative act repugnant to it; or, that the legislature may alter the constitution by an ordinary act.
>
> Between these alternatives there is no middle ground. The constitution is either a superior, paramount law, unchangeable by ordinary

> means, or it is on a level with ordinary legislative acts, and like other acts, is alterable when the legislature shall please to alter it.
>
> If the former part of the alternative be true, then a legislative act contrary to the constitution is not law: if the latter part be true, then *written* constitutions are absurd attempts, on the part of the people, to limit a power, in its own nature illimitable.
>
> Certainly all those who have framed *written* constitutions contemplate them as forming the fundamental and paramount law of the nation, and consequently the theory of every such government must be, that an act of the legislature, repugnant to the constitution, is void.
>
> *This theory is essentially attached to a written constitution*, and is consequently to be considered, by this court, as one of the fundamental principles of our society. It is not therefore to be lost sight of in the further consideration of this subject. . . .

Id. 5 U.S. at 176–77 (emphasis added).

Note Chief Justice Marshall's repeated emphasis on the fact that the Constitution is written. Marshall's argument is as simple as it is elegant—the fact that the Constitution is a written text simultaneously *justifies* and *constrains* federal courts' power of judicial review. It justifies the power because when a court is confronted

with conflicting texts—i.e., the text of a challenged law and the text of the Constitution—it is bound by the latter and must declare the former void. It constrains the power because judges' authority is limited to interpreting the text. They have no authority to engage in "freewheeling judicial policymaking." *Dobbs*, 597 U.S. at 240. A court's appraisal of the wisdom or unwisdom of a law must be put aside. If the law comports with the constitutional text, "the judicial process comes to an end." *Tennessee Valley Auth. v. Hill*, 437 U.S. 153, 194 (1978). This Court does not "sit as a committee of review" and it is not "vested with the power of veto." *Id.*, at 194-95. Thus, where the constitution's text is silent, a federal court must also be silent.

Of course, the text's fundamental role in justifying and constraining the power of judicial review would be completely nullified if that text had no fixed meaning. The so-called "living constitution" program pursuant to which the text means anything a willful judge says it means is inconsistent with democratic self-rule by a free people. It also undermines the rationale for judicial review in the first place. If judicial review is premised on the text, a theory of judicial interpretation that effectively frees a judge from the text is illegitimate under Marshall's reasoning in *Marbury*. Living constitution advocates advance a cake-and-eat-it-too approach to constitutional law in which they retain the power of judicial review while jettisoning the sole justification for the existence of that power. Thus, determining the fixed meaning of the text at a particular moment in time is of utmost importance for the very legitimacy of judicial review. As demonstrated in the next section, for enumerated rights, that time has always been considered the time when the Bill of Rights was ratified in 1791, because "Constitutional rights are

enshrined with the scope they were understood to have when the people adopted them." *Bruen*, 597 U.S. at 34 (quoting *Heller*, 554 U.S. at 634-35).

E. The Scope of a Right is Pegged to the Public Understanding of the Right in 1791

The Court has consistently held that the scope of an enumerated right is pegged to the public understanding of the right when the Bill of Rights was ratified in 1791. The following is a sampling of numerous examples of the application of this doctrine.

First Amendment Religion Cases

In *Espinoza v. Montana Dep't of Revenue*, 591 U.S. 464 (2020), the government relied on a tradition against state support for religious schools that arose in the second half of the 19th century. More than *30 states* adopted no-aid provisions during this time. 591 U.S. at 482. The Court rejected the government's argument because such a late development "cannot by itself establish an early American tradition." *Id.* See also *Reynolds v. United States*, 98 U.S. 145, 162 (1878) (The meaning of the First Amendment is determined by the "history of the times in the midst of which the provision was adopted."); *Hosanna-Tabor Evangelical Lutheran Church & Sch. v. E.E.O.C.*, 565 U.S. 171, 183 (2012) (looking to views of the "founding generation"); *Lynch v. Donnelly*, 465 U.S. 668, 673 (1984) ("The Court's interpretation of the Establishment Clause has comported with what history reveals was the contemporaneous understanding of its guarantees."); and *Fulton v. City of Philadelphia, Pennsylvania*, 593 U.S. 522, 544 (2021) (Alito, J., concurring) (central question is

what the free-exercise right was understood to be when the First Amendment was adopted).

First Amendment Speech Cases

In *Nevada Comm'n on Ethics v. Carrigan*, 564 U.S. 117, 122 (2011), the Court wrote: "Early congressional enactments provide contemporaneous and weighty evidence of the Constitution's meaning. That evidence is dispositive here." (citations omitted; cleaned up). See also *Near v. State of Minnesota ex rel. Olson*, 283 U.S. 697, 714 (1931) (examining Founding-era authorities to determine scope of freedom of the press).

Fourth Amendment

In *Virginia v. Moore*, 553 U.S. 164, 168 (2008), the Court wrote: "We are aware of no historical indication that *those who ratified the Fourth Amendment* understood it as a redundant guarantee of whatever limits on search and seizure legislatures might have enacted." (emphasis added). See also *Wyoming v. Houghton*, 526 U.S. 295, 299 (1999) (scope of Fourth Amendment protection determined "when the Amendment was framed"); and *Wilson v. Arkansas*, 514 U.S. 927, 931 (1995) (same).

Fifth Amendment

Gamble v. United States, 587 U.S. 678, 683 (2019), held that the scope of the double jeopardy clause is determined by what the word "offense" was commonly understood to mean in 1791.

Sixth Amendment

In *Crawford v. Washington*, 541 U.S. 36, 54 (2004), the Court held that the right to be confronted with witnesses refers to the right of confrontation at common law "admitting only those exceptions established at the time of the founding." See also *Ramos v. Louisiana*, 590 U.S. 83, 91 (2020) (understanding of right to jury in 1791 dispositive); *Powell v. Alabama*, 287 U.S. 45, 60-67 (1932) (right to counsel pegged to early American history); and *Klopfer v. North Carolina*, 386 U.S. 213, 223-25 (same regarding right to speedy trial).

Professor Smith wraps this discussion up as follows:

> The author has not found, and litigants in post-*Bruen* litigation have so far not pointed to, a *single* Supreme Court case [] in which the [] Court has looked to the time of ratification of the Fourteenth Amendment as the principal period for determining the scope or meaning of a provision of the Bill of Rights.

Smith, 25-26 (emphasis in original).

F. Later History Can Liquidate an Understanding of the Text; it Cannot Change the Text

As noted above, 30 states adopted no-aid provisions in the second half of the nineteenth century. *Espinoza*, 591 U.S. at 482. The Court held that these late-adopted laws were simply irrelevant to the meaning of the First Amendment. *Id.* This is consistent with *Bruen's* approach to post-ratification history. Nineteenth-century evidence

may be relevant to determining the public understanding of a provision of the Bill of Rights as of the time it was ratified. *Bruen*, 597 U.S. at 35. Also, evidence that a governmental practice has been open, widespread, and unchallenged since the early days of the Republic can serve to "liquidate" the meaning of a phrase in the Constitution. *Id.* at 35-36. Nevertheless, as in *Espinoza*, late nineteenth-century evidence cannot provide much insight into the meaning of a provision of the Bill of Rights "when it contradicts earlier evidence." *Id.* at 66.

In summary, if the text is vague and Founding-era history is elusive or inconclusive, post-ratification history may be important in interpreting the constitutional text. *Rahimi*, 602 U.S. at 723 (Kavanaugh, J., concurring). By the same token, if the Founding-era history supporting a particular interpretation of an enumerated right is robust, post-ratification history that contradicts that interpretation is simply irrelevant. *Bruen*, 597 U.S. at 66, n. 28 (Late evidence "does not provide insight into the meaning of the Second Amendment when it contradicts earlier evidence."). See also *Rahimi*, 602 U.S. at 738 ("evidence of 'tradition' unmoored from original meaning is not binding law") (Barrett, J., concurring).

Justice Barrett's concurrence in *Rahimi* should be emphasized, because, as Judge Newsom recently observed, the Court should be wary of attempts to change the text by means of an ersatz "traditionalism." He wrote:

> My first fear is that traditionalism gives off an originalist "vibe" without having any legitimate claim to the originalist mantle. It seems old and dusty—and thus objective

> and reliable. And maybe it is indeed all those things. But let's be clear: it's not originalism. Remember, originalism is fundamentally a text-based interpretive method. We originalists say that any particular constitutional provision should be interpreted in accordance with its common, ordinary meaning *at the time it was adopted and ratified*. If we really mean that, then by definition, it seems to me, evidence that significantly *post*-dates that provision's adoption isn't just second-best—it's positively *irrelevant*.

Hon. Kevin C. Newsom, *The Road to Tradition or Perdition? An Originalist Critique of Traditionalism in Constitutional Interpretation*, 47 Harv. J.L. & Pub. Pol'y 745, 754 (2024) (emphasis in the original).

CONCLUSION

For the reasons set forth herein, NAGR respectfully requests the Court to grant the petition for writ of certiorari.

Respectfully submitted,

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