

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 Writ of Certiorari to the
United States Court of Appeals for the Ninth Circuit*

**BRIEF FOR THE STATES OF MONTANA, IDAHO,
23 OTHER STATES, AND THE ARIZONA LEGISLA-
TURE AS *AMICI CURIAE* IN SUPPORT OF PETI-
TIONERS AND REVERSAL**

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STATEMENT OF INTEREST AND INTRODUCTION¹

Just a few years ago, this Court reminded lower courts that the right to keep and bear arms “is not ‘a second-class right, subject to an entirely different body of rules than the other Bill of Rights guarantees.’” *N.Y. State Rifle & Pistol Ass’n v. Bruen*, 597 U.S. 1, 70 (2022) (quoting *McDonald v. City of Chi.*, 561 U.S. 742, 780 (2010) (plurality op.)). Yet courts across the country continue to defer to legislative “judgments regarding firearm regulations” despite *Bruen*’s declaration that “judicial deference to legislative interest balancing ... is not [the] deference that the [Second Amendment] demands.” *Id.* at 26. While the district court deferred to the balance struck by the American people—“the right of law-abiding, responsible citizens to use arms’ for self-defense,” *id.* (quoting *District of Columbia v. Heller*, 554 U.S. 570, 635 (2008)), the Ninth Circuit charted a different course: “blessing” Hawaii’s efforts to ban “law-abiding and licensed citizens ... from carrying firearms in most public and private spaces.” Pet’rs’ App. (“Pet.App.”) at 170a (Vandyme, J., dissenting from denial of rehearing en banc).

Purportedly seeking to address concerns about public safety and gun violence, the Hawaii legislature created a default rule against public carry on private property held open to the public. Rather than presuming that public carry was permissible unless expressly

¹ No counsel for a party authored this brief in whole or in part, and no person other than *amici* or their counsel contributed money intended to fund the preparation or submission of this brief.

forbidden, public carry is now presumptively forbidden in Hawaii unless expressly permitted. This essentially limits the right to carry to “only while taking your dog out for a walk on a city sidewalk.” Pet.App.170a (VanDyke, J., dissenting from denial of rehearing en banc). It changes the exercise of a constitutional right into a charade of the children’s game “Mother, May I?”

States may not flip the default rule as subterfuge for banning law-abiding and licensed citizens from the public-carry right *Bruen* secured. See Pet.App.178a-180a. To ensure that courts properly revert from their treatment of Second Amendment rights as “second-class rights” as *Bruen* requires, and allow citizens the full freedom secured by the constitution, the States of Montana, Idaho, Alabama, Alaska, Arkansas, Florida, Georgia, Indiana, Iowa, Kansas, Kentucky, Louisiana, Mississippi, Missouri, Nebraska, New Hampshire, North Dakota, Ohio, Oklahoma, South Carolina, South Dakota, Tennessee, Texas, Utah, West Virginia, Wyoming, and the Arizona Legislature (“Amici States”) submit this amicus brief in support of petitioners and urge this Court to reverse.

SUMMARY OF THE ARGUMENT

In June 2023, in the wake of *Bruen*, Hawaii’s legislature enacted Act 52 (codified at Haw. Rev. Stat., ch. 134), purportedly to address concerns about “public health, safety, and welfare associated with firearms and gun violence.” See Pet.App.86a. Act 52’s so-called “default rule” prohibits carrying a firearm on another’s property without express authorization. Haw. Rev. Stat. §134-9.5.

Plaintiffs Jason Wolford, Alison Wolford, Atom Kasprzycki, and the Hawaii Firearms Coalition alleged that this default rule, along with sensitive-place restrictions imposed by Act 52 that are not presently before this Court, violate their “constitutional right to bear arms in public for self-defense.”² *Bruen*, 597 U.S. at 70. Wolford sought a temporary restraining order (“TRO”) and preliminary injunction (“PI”) to enjoin Hawaii from enforcing the above provisions of Act 52. Pet.App.83a-84a & n.2. The district court considered only Plaintiffs’ request for a TRO, and as relevant here it enjoined: §134-9.1(a)(4) (bars and restaurants serving alcohol), §134-9.1(a)(9) (parks and beaches), and §134-9.5 (private property held open to the public). Pet.App.83a-85a & n.2. By stipulation, the district court converted the TRO into a PI, Pet.App.215a-218a, and Hawaii appealed, Pet.App.10a. The Ninth Circuit reversed the district court’s grant of the preliminary injunction as to Haw. Rev. Stat. §§134-9.1(a)(4), (9), and 134-9.5. Pet.App.79a. The full court denied Wolford’s petition for hearing en banc. Pet.App.169a.

Bruen reassured law-abiding gun owners that the Second Amendment was no longer a “second-class right.” 597 U.S. at 70. But the Ninth Circuit sanctioned second-class treatment by reversing the injunction of the law’s default against gun owners’ exercise of their Second Amendment rights on private property open to the public. Act 52 purports to address problems that have existed since the Founding, yet Hawaii failed to produce any “distinctly similar” Founding-era

² This brief refers to Petitioners as “Wolford” and Respondent as “Hawaii” unless otherwise indicated.

laws supporting its public-carry default-ban absent express authorization. Hawaii’s “failure to do so should be dispositive.” Pet.App.195a (VanDyke, J., dissenting from denial of rehearing en banc). The panel erred in concluding that two of Hawaii’s proposed analogues showed “an established tradition of arranging the default rules that apply specifically to the carrying of firearms onto private property.” Pet.App.62a. The two laws, enacted nearly 100 years apart, by states representing less than 5 percent of the population, are not representative of any historical tradition, appear to apply to land *not* open to the public, and, accordingly, should be treated as the mere outliers that they are, rather than as sufficient justification for presuming a law-abiding gun owner is forbidden from exercising constitutional rights.

Instead of acting to secure the Second Amendment rights guaranteed to citizens as affirmed by *Bruen*, Hawaii’s enactment of Act 52 illustrates the State’s entrenched hostility to these rights. State laws enacted in recent years along with state court decisions demonstrate that the State of Hawaii has decided there’s no room for an individual right to bear arms within its so-called “spirit of Aloha.” Unfortunately, it’s not alone. Several lower court rulings also have largely failed to follow through on *Bruen*’s promise by resorting to manipulative en banc practices, ahistorical interpretations of covered “arms,” and improperly calibrating the level of generality for *Bruen*’s inquiry.

ARGUMENT

I. The Ninth Circuit’s “default rule” holding unconstitutionally restricts Second Amendment rights.

The rights embedded in the Constitution generally protect against state action—not private action. *See, e.g., Wooley v. Maynard*, 430 U.S. 705, 714 (1977). This means that Hawaii cannot prohibit its citizens from bearing arms in public, *Bruen*, 597 U.S. at 9, but private property owners are generally free to do so within the boundaries of their property. Hawaii’s Act 52 flipped this presumption. The law prohibits a person from carrying a firearm on privately held property unless the owner has given express authorization that carrying or possessing a firearm is authorized through either “[u]nambiguous written or verbal authorization,” or “[t]he posting of clear and conspicuous signage at the entrance of the building or on the premises.” Haw. Rev. Stat. §134-9.5.

By changing the default rule that citizens may exercise their constitutional rights—decreeing that firearms are prohibited on private property unless the owner expressly consents in advance—Hawaii coopts the owners’ power to restrict Hawaiians’ exercise of their right to bear arms. The Ninth Circuit failed to recognize how deeply problematic this rule is, and relied on inapposite outlier regulations to justify its reversal of the injunction below.

A. Hawaii’s default rule unconstitutionally burdens the exercise of Second Amendment rights.

The Second Amendment is not the only constitutional right that property owners can interfere with. They can restrict speech on their property, or association, or religious exercise. *See, e.g., Lloyd Corp. v. Tanner*, 407 U.S. 551, 570 (1972). And unless they are public accommodations, they can exclude people on the basis of race, sex, or another protected characteristic. *Roberts v. U.S. Jaycees*, 468 U.S. 609, 624 (1984).

In any of those contexts, a law like Hawaii’s would be unconstitutional. Imagine an anti-abortion state banning abortion discussions on private property without the owner’s prior express consent. Or imagine a state requiring express consent before visitors to a property could pray, or read *White Fragility*, or hold hands with a same-sex spouse. No doubt the owners could overrule the state and tell visitors that the forbidden conduct was permitted, but most visitors to stores and restaurants and such would never ask—compliance with the state’s unconstitutional wishes would be easier.

The only reason a court would reach the opposite conclusion here is because it continues to treat the Second Amendment as a “second-class” right. *McDonald*, 561 U.S. at 780. Since this Nation’s founding, a citizen could enter a business open to the public with a firearm unless informed otherwise by the owner. Pet.App.173a. In explicit response to this Court’s decision in *Bruen* and flipping this presumption, Hawaii enacted a new “default rule”—prohibiting a citizen from carrying a firearm on another’s property without

advance permission—whether or not the property is open to the public. Indeed, the Governor’s office explained that “SB 1230 was prepared in response to the U.S. Supreme Court’s *Bruen* decision,” and “[t]he new state law is intended to mitigate the harm arising from the Supreme Court decision....” Office of the Governor – News Release – *Gov. Green Signs Firearms Legislation*, <https://tinyurl.com/2vrysv73>; Haw. Rev. Stat. §134-9.5(b). As the Ninth Circuit noted, it did this knowing that few (if any) businesses will expressly provide this consent. For Hawaii, narrowing the public’s right to carry was a feature of the law, not a bug. Pet.App.57a.

The Ninth Circuit allowed this de facto public-carry ban to go forward. *Amici* ask this Court to reiterate that states may not relegate Second Amendment rights to second-class status and rule in favor of Petitioners.

B. The Ninth Circuit erroneously relied upon two outlier, non-analogous laws to find Act 52 falls within the historical tradition.

The *Bruen* analysis is straightforward. At step one, the court determines whether the plain text of the Second Amendment covers the individual’s conduct at issue. *Bruen*, 597 U.S. at 17. If it does, “the Constitution presumptively protects that conduct.” *Id.* The Amendment’s plain text “protects [Wolford’s] proposed course of conduct—carrying handguns publicly for self-defense.” *Id.* at 32.

With a presumption of constitutional protection, the state can justify its restriction at step two by showing that it is “consistent with this Nation’s historical

tradition of firearm regulation.” *Id.* at 17. Only after a state makes that showing “may a court conclude that [Wolford’s proposed] conduct falls outside the Second Amendment’s ‘unqualified command.’” *Id.* (quoting *Konigsberg v. State Bar of Cal.*, 366 U.S. 36, 50 n.10 (1961)). Hawaii thus had the burden of demonstrating that its default-rule restriction was consistent with this Nation’s historical tradition of firearm regulation.

The Ninth Circuit began the *Bruen* analysis correctly. It held that if a law falls within the plain text of the Second Amendment, then it falls within the plain text of the Second Amendment, Pet.App.58a—a notion that has not commanded the universal judicial assent one would hope for. *See, e.g., Bianchi v. Brown*, 111 F.4th 438 (4th Cir. 2024) (holding that arms are not necessarily arms under the Second Amendment); *Bevis v. City of Naperville*, 85 F.4th 1175 (7th Cir. 2023), *cert. denied sub nom. Harrel v. Raoul*, 144 S. Ct. 2491 (2024) (same); *Duncan v. Bonta*, 133 F.4th 852 (9th Cir. 2025) (holding that necessary parts of a firearm are not necessarily protected by the plain text Second Amendment). The Ninth Circuit observed that this Court has held that “the Second Amendment’s text covers carrying firearms publicly outside the home” and thus also likely covers “carrying onto properties held open to the public” even if privately owned. Pet.App.58a.

Also as *Bruen* requires, the Ninth Circuit correctly held that “[t]he government must then justify its regulation by demonstrating that it is consistent with the

Nation’s historical tradition of firearm regulation.” Pet.App.20a-21a (citation omitted).

But after that the Ninth Circuit erred in its application of *Bruen*. Instead, it reached a conclusion that would immediately strike anyone passingly familiar with this Nation’s history as absurd. It concluded that “the Nation has an established tradition of arranging the default rules that apply specifically to the carrying of firearms onto private property.” Pet.App.62a.

While the court rightly discounted a smattering of anti-poaching laws, the Ninth Circuit upheld the law on the basis of two historical regulations: a 1771 New Jersey law and a 1865 Louisiana law. Pet.App.61a. The court found that these laws purportedly “bann[ed] the carrying of firearms onto any private property without the owner’s consent”—just like Hawaii’s law. Pet.App.61a. And that was enough for the court to reverse the district court’s injunction.

The court should have discounted both regulations. For good reason, both the Second Circuit and Judge VanDyke’s dissent from the Ninth Circuit denial of rehearing en banc found no basis to rely on these regulations. New Jersey’s law “was an antipoaching and antitrespassing ordinance—not a broad disarmament statute.” Pet.App.186a; *Antonyuk v. James*, 120 F.4th 941, 1046-47 (2d Cir. 2023). And Judge VanDyke observed that Louisiana’s law “was enacted as part of Louisiana’s notorious Black Codes that sought to deprive African Americans of their rights, including the right to keep and bear arms.” Pet.App.187a. In short, the only common resemblance among the laws is that, at the highest level of generality, they prohibited the carriage of firearms on private property without the

owner's consent. Neither law's purpose remotely resembled the purported "why" of Hawaii's law: a general reduction in gun violence.

Beyond missing the laws' supposed purpose, the Ninth Circuit also overlooked the fact that neither the Louisiana nor New Jersey law prohibited carrying firearms on private lands *open to the public*. *Antonyuk*, 120 F.4th at 1046-47. Yet that prohibition is materially different from restricting *public* carrying of firearms on private lands open to the public. *Id.* at 1047. The Ninth Circuit even acknowledged the relevance of this distinction by disregarding a number of other early state laws because they were "limited to only a subset of private property," and "likely did not apply to property that was generally open to the public." Pet.App.185a. Despite this acknowledgment as to other laws cited by the State of Hawaii, the court inexplicably ignored that neither the Louisiana nor New Jersey law targeted private land open to the public.

Nor did the Ninth Circuit consider that these two laws, passed nearly a century apart, could be anything but idiosyncratic "outliers that our ancestors would never have accepted." *Bruen*, 597 U.S. at 30 (cleaned up); Pet.App.182a; *Antonyuk*, 120 F.4th at 1044.

The Louisiana law is especially irrelevant to the analysis. *Bruen* explained that "when it comes to interpreting the Constitution, not all history is created equal." 597 U.S. at 34. Rather, "[c]onstitutional rights are enshrined with the scope they were understood to have *when the people adopted them*." *Id.* (quoting *Heller*, 554 U.S. at 634-35 (emphasis added)). So evidence closer in time to the Second Amendment's adoption is most relevant for understanding the Amendment's

scope. Of course, evidence of historical regulations through the end of the nineteenth century *could* be relevant, but only to the extent that it confirms what prior evidence “already ... established.” *Id.* at 37 (quoting *Gamble v. United States*, 139 S. Ct. 1960, 1976 (2019)).

Even if this Reconstruction-era law were probative of a historical tradition of restricting the right to public carry, it and the New Jersey law are merely two isolated examples that do not even expressly relate to private lands open to the public. They were enacted nearly 100 years apart, by states with a tiny portion of the national population. This evidence is “surely too slender a reed on which to hang a historical tradition of restricting the right to public carry.” *See Bruen*, 597 U.S. at 58.

The Ninth Circuit just ignored these issues. Pet.App.61a-62a. After skipping most of the inquiry *Bruen* demanded, the court erroneously found that the historical regulations are not just “relevantly similar” to Hawaii’s law, but that they were “dead ringers.” Pet.App.62a. With this, the court found an established historical tradition directly at odds with the text of the Second Amendment and upheld the law. Pet.App.62a. Those findings are straight from Wonderland:

“When I use a word,” Humpty Dumpty said in rather a scornful tone, “it means just what I choose it to mean—neither more nor less.”

“The question is,” said Alice, “whether you can make words mean so many different things.”

“The question is,” said Humpty Dumpty, “which is to be master—that’s all.”

LEWIS CARROLL, *THROUGH THE LOOKING GLASS* 124 (1872).

* * *

The Court should reject this latest attempt to disregard its precedent to give a critical constitutional right “second-class” status. *McDonald*, 561 U.S. at 780. Without swift correction, the Ninth Circuit’s decision will muddle the clear Second Amendment standards this Court has adopted and encourage other states to erode Americans’ essential right to keep and bear arms.

II. Act 52 is the latest illustration of Hawaii and other States’ hostility toward Second Amendment rights.

Bruen reassured law-abiding and licensed gun owners that the Second Amendment was no longer a “a second-class right, subject to an entirely different body of rules than the other Bill of Rights guarantees.” 597 U.S. at 70 (citation omitted). Since *Bruen* was issued in 2022, however, Hawaii has continued to restrict Second Amendment rights while giving choreographed lip service to these rights. Hawaii passed Act 52 to give the appearance that it was adhering to *Bruen* while continuing to enforce and enact among the most restrictive gun laws in the country. Act 52 may have expanded access to concealed carry, but it simultaneously imposed a default rule against concealed carry in a vast array of public places—thus

imposing a significant barrier to the exercise of this right.

Act 52 is only the latest example of the State's entrenched hostility to Second Amendment rights. In 2024, Hawaii lawmakers raised the age for ammunition purchases to 21 years old, and required government-issued ID checks for all sales or transfers of ammunition. Haw. Rev. Stat. §134-7.7. In 2023, Hawaii lawmakers increased burdensome accountability requirements for the gun industry, allowing individuals, the Attorney General, and local governments to bring civil actions against manufacturers and sellers for harm caused by firearms. Haw. Rev. Stat. §134-103. State law bans assault pistols, and Hawaii is one of only a handful of states with a "may issue" (rather than "shall issue") licensing law giving authorities discretion to deny concealed-carry licenses even when the applicant satisfies the statutory criteria. *See Bruen*, 597 at 13-15.

Also in 2024, the Supreme Court of Hawaii notoriously upheld Hawaii's "place to keep" laws requiring all ammunition and firearms to be confined to the possessor's business or residence, allowing for only the limited transport of these items in an enclosed container. *State v. Wilson*, 543 P.3d 440 (Haw. 2024) (addressing Haw. Rev. Stat. Ann. §134-25 and §134-27). The Supreme Court of Hawaii's decision to uphold these laws was a brazen refusal to follow *Bruen*, as the laws were substantially similar to the New York law struck down as unconstitutional. The Supreme Court of Hawaii suggested that *Heller* was issued as a craven nod to "interest groups" who had "advanced an individual rights interpretation" at odds with the

purportedly correct militia-centric view of the Second Amendment. *Wilson*, 543 P.3d at 454. Finally, leaving no doubt as to the State’s view of the Second Amendment, the court stated that “[t]he spirit of Aloha” “clashes” with the right to carry firearms in public. *Id.* at 459.

In passing these laws and issuing this decision, Hawaiian lawmakers and judges may have been reassured by the lower courts’ continued restriction of Second Amendment rights even post-*Bruen*. Courts have resorted to manipulative en banc practices. *See, e.g., Duncan*, 131 F.4th at 1069 (Bumatay, J., dissenting) (arguing that original en banc panel’s decision to retake possession of the case—despite a new district court decision under new Supreme Court precedent, eight new judges, and five new senior judges on the en banc panel—violated 28 U.S.C. §46(c)). They have resorted to ahistorical interpretations of covered “arms.” *See, e.g., Bevis*, 85 F.4th at 1220-21, 1222 (Brennan, J., dissenting) (noting the majority found AR-15s weren’t “Arms” by relying on abrogated precedent and holding that *Heller* limited covered “Arms” to “those not ‘dedicated to military use’” (citation omitted)). And they have resorted to improper calibration of the level of generality for *Bruen*’s analogical inquiry. *See, e.g., Pet.App.197a* (“panel extracted very broad principles from the historical record that could support the constitutionality of almost any firearms restriction”) (VanDyke, J., dissenting from denial of rehearing en banc).

Each of these ploys chips away at the scope of citizens’ Second Amendment rights, and if unchecked by

this Court, *Bruen*'s reassurance will be little more than an empty promise.

CONCLUSION

The Amici States respectfully ask this Court to reverse.

November 24, 2025

Respectfully submitted,

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