

No. 24-154

IN THE

Supreme Court of the United States

CATHOLIC CHARITIES BUREAU, INC., ET AL.,
Petitioners,

v.

WISCONSIN LABOR AND INDUSTRY REVIEW
COMMISSION, ET AL.,
Respondents.

**On Writ of Certiorari to the
Supreme Court of Wisconsin**

**BRIEF OF *AMICUS CURIAE*
CATHOLIC CHARITIES USA
IN SUPPORT OF PETITIONERS**

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**INTERESTS OF THE
NON-PARTY *AMICUS CURIAE***

Catholic Charities USA (“CCUSA”)¹ is the nonprofit national voluntary membership organization representing 168 Catholic Charities member agencies throughout the United States and its territories, including Catholic Charities Bureau, Inc., Diocese of Superior, and its four sub-entities (“Petitioners”).

The underlying question presented on appeal – whether a Catholic Charities entity that provides services to people in need without proselyting is engaged in religious activities – is of critical importance to CCUSA’s members, who operate more than 3,500 service locations across fifty states, the District of Columbia, and five U.S. Territories. The diverse array of social services offered by Catholic Charities agencies helped more than 14 million people in need last year who are among the most vulnerable members of our society. These agencies help all people, regardless of their faith, who are struggling with poverty and other complex issues.

A holding that Catholic Charities agencies that “neither attempt to imbue program participants with the Catholic faith nor supply any religious materials to program participants”² are not engaged in religious

¹ No party or counsel for a party authored this brief in whole or in part, and no entity, aside from amicus and its counsel, made any monetary contribution toward the preparation or submission of this brief.

² Wis. Sup. Ct. Opinion at ¶ 60.

activities would have a crippling effect on all Catholic Charities agencies, because the Catholic faith expressly prohibits proselytizing when providing charitable services.

CCUSA submits this non-party amicus curiae brief to educate the Court on both Catholic Social Doctrine and Catholic canon law as they pertain to the religious activities of Petitioners and all Catholic Charities agencies.

As the national membership organization for Catholic Charities agencies, CCUSA is uniquely situated to speak to the religious purposes of its member agencies' activities and to educate the Court about the centrality to the Catholic faith of charitable works without proselytizing.

INTRODUCTION AND SUMMARY OF ARGUMENT

The Wisconsin Supreme Court held that the Petitioners did not meet the requirements of the religious purpose exemption under Wis. Stat. § 108.02(15)(h)2 (2019–20) in large part because they do not proselytize when providing services to people living in poverty and in vulnerable populations. The Wisconsin Supreme Court failed to consider Catholic Social Doctrine, papal encyclicals, or Catholic canon law regarding the purpose and mission of Catholic Charities organizations and the prohibition on proselytizing when performing charitable works; rather, the Wisconsin Supreme Court substituted its own interpretation of the Catholic faith notwithstanding the well-established rule that judges

are precluded from making decisions that require evaluating and determining the substance of religious doctrine. *See, e.g., County of Allegheny v. ACLU*, 492 U.S. 573, 678 (1989) (Kennedy, J., concurring in the judgment in part and dissenting in part); *Thomas v. Review Bd. Ind. Employment Sec. Div.*, 450 U.S. 707, 715 (1981).

The portion of the Wisconsin Supreme Court's decision that relies on the Court's determination that the services provided by Petitioners are not religious practices because Petitioners do not proselytize when providing the services stands in stark opposition to the teachings of the Catholic faith with respect to charitable services. The Church teaches:

1. The Church has a direct responsibility to do charitable works throughout the world. In the United States, those works are performed by Catholic Charities agencies under the auspices of the Bishop of the Catholic Diocese in which the agency is located.
2. Charitable works are to be done for all persons in need without regard to a person's faith or any other individual characteristic.
3. Proselytizing when providing services or performing charitable works is strictly prohibited.

The work of Petitioners is an integral part of the mission of the Catholic Church performed by an integrated organization of the Church. Catholic Charities provide services to people in need not to

convert the recipients, but rather to fulfill the mission of the Church. Their charitable work is at the heart of the Church's social doctrine, and it is impossible to separate the Church's works of charity from the evangelizing of the Catholic Church. Therefore, all such works are conducted for religious purposes. Moreover, the Catholic Church prohibits Catholic organizations from proselytizing while providing services to people in need. To the extent the opinion of the Wisconsin Supreme Court is based on the Court's opinion that the Catholic faith should be modified to require proselytizing when providing needed services, the opinion should be reversed.

ARGUMENT

I. CATHOLIC WORKS OF CHARITY CANNOT BE USED AS A MEANS OF ENGAGING IN PROSELYTIZING.

A. The Catholic Church Prohibits Proselytizing While Performing Charitable Works.

The Wisconsin Supreme Court conceded that the Petitioners are “operated, supervised, controlled, or principally supported by a church or convention or association of churches,” but went on to hold that the Petitioners are not operated primarily for religious purposes within the meaning of Wis. Stat. § 108.02(15)(h)2 based largely on the following finding:

[N]either those employed nor those receiving services from CCB or the sub-entities are required to be of any

particular religious faith. Individuals participating in the programs do not receive any religious training or orientation, and CCB and the sub-entities do not try to “inculcate the Catholic faith with program participants.”

Opinion at ¶ 16.

The Court’s holding is fatally flawed because it ignores the simple, but crucial, facts that (1) Catholic Charities serve all people in need regardless of a person’s faith or lack of faith, and (2) the Catholic Church does not allow Catholic Charities agencies (or any Catholic organization) to proselytize when providing services. These hallmarks of Catholic Charities are in large part what distinguishes them from all other faith-based providers of charitable services. Ignoring these critical facts, the Wisconsin majority apparently assumed that all faith traditions follow the Evangelical tradition of proselytizing. In fact, proselytizing when providing services to people in need is antithetical to the Catholic faith. Non-proselytizing in the delivery of services is co-equal with the providing of services as part of the mission of Catholic Charities. This is a core tenet of the Catholic faith.

In *Dignitatis Humanae*³, Pope Paul VI wrote:

³ Second Vatican Council, Declaration on Religious Freedom, *Dignitatis Humanae*, 7 December 1965 (footnotes omitted).

This Vatican Council declares that the human person has a right to religious freedom. This freedom means that all men are to be immune from coercion on the part of individuals or of social groups and of any human power, in such wise that no one is to be forced to act in a manner contrary to his own beliefs, whether privately or publicly, whether alone or in association with others, within due limits.

The freedom or immunity from coercion in matters religious which is the endowment of persons as individuals is also to be recognized as their right when they act in community.

[I]n spreading religious faith and in introducing religious practices everyone ought at all times to refrain from any manner of action which might seem to carry a hint of coercion or of a kind of persuasion that would be dishonorable or unworthy, ***especially when dealing with poor or uneducated people.*** Such a manner of action would have to be considered an abuse of one's right and a violation of the right of others. (emphasis added)

It is one of the major tenets of Catholic doctrine that man's response to God in faith must be free: no one therefore is to be forced to embrace the Christian faith against his own will. This doctrine is contained in the word of God and it was

constantly proclaimed by the Fathers of the Church.

In his encyclical letter *Deus Caritas Est*, Pope Benedict XVI addressed the question of proselytizing the Catholic faith while performing charitable works:

Charity, furthermore, cannot be used as a means of engaging in what is nowadays considered proselytism. Love is free; it is not practised as a way of achieving other ends. But this does not mean that charitable activity must somehow leave God and Christ aside. For it is always concerned with the whole man. Often the deepest cause of suffering is the very absence of God. Those who practise charity in the Church's name will never seek to impose the Church's faith upon others. They realize that a pure and generous love is the best witness to the God in whom we believe and by whom we are driven to love. A Christian knows when it is time to speak of God and when it is better to say nothing and to let love alone speak. He knows that God is love (cf. *1 Jn* 4:8) and that God's presence is felt at the very time when the only thing we do is to love. He knows—to return to the questions raised earlier—that disdain for love is disdain for God and man alike; it is an attempt to do without God. Consequently, the best defence of

God and man consists precisely in love. It is the responsibility of the Church's charitable organizations to reinforce this awareness in their members, so that by their activity—as well as their words, their silence, their example—they may be credible witnesses to Christ.⁴

(emphasis added).

Pope Benedict XVI could not have said it any more clearly: “Charity, furthermore, cannot be used as a means of engaging in what is nowadays considered proselytism.” That is the official position of the Church and all Catholic Charities agencies are bound by this prohibition. As Pope Paul VI said, this is especially true when working with people who are living in poverty or who are uneducated, which constitutes the overwhelming majority of persons Catholic Charities agencies serve. Catholic Charities agencies in the United States and their international counterparts in *Caritas Internationalis* do not proselytize for the simple reason that the Catholic faith forbids them from doing so. The Wisconsin Supreme Court’s determination that adhering to a core tenet of the Catholic faith somehow means Catholic Charities agencies are not operated primarily for religious purposes is completely without merit and, more important, is an egregious attempt by a secular court to impose its views on what the beliefs of a more than 2,000 year old faith tradition should be

⁴ *Deus Caritas Est*, Encyclical Letter of Pope Benedict XVI (December 25, 2005) (emphasis added).

— a total violation of the Constitutional requirement of separation of church and state.

The Wisconsin Supreme Court’s opinion as to what does or does not constitute “religious practices” of the Catholic Church is not determinative and violates the well-established rule that judges are precluded from making decisions that require evaluating and determining the substance of religious doctrine. See, e.g., *Thomas v. Review Board of Indiana Employment Security Division*, 450 U.S. 707, 716 (1981). Rather, the teachings of the Catholic Church and its centuries-old interpretation of what constitute the religious doctrine and required “religious purposes” of the Church must be given deference. Those teachings and purposes are clear: the core of the religious practices of the Catholic Church includes providing services to those living in poverty, in vulnerable communities, and in need without regard to a person’s faith or other characteristics and without proselytizing.

Catholic Charities help all persons in need, regardless of a person’s religious tradition or lack thereof, because the Catholic faith requires them to do so.⁵ They do not proselytize or force the Catholic

⁵ The Wisconsin Supreme Court also used as a basis for its decision denying the applicability of the “religious purposes” exemption the fact that each of the four sub-entities receives funding for their operations “primarily through government contracts and does not receive funding from the Diocese.” Opinion at ¶ 14. Nationally, approximately 35-40% of Catholic Charities’ funding comes from local, state, and federal government contracts. Government at all levels in the United States recognizes that Catholic Charities agencies are better

faith on people who are suffering; they simply help them as Jesus Christ and the Catholic Church require them to do. The Wisconsin Supreme Court also demonstrated an extremely narrow and incorrect understanding of what “evangelizing” means in the Catholic Church. The Catholic Church believes that charity and evangelizing are inseparable:

“Practicing charity is the best way to evangelize.” Pope Frances (@Pontifex), X (January 24, 2015, 4:24 AM), https://twitter.com/pontifex/status/55891816460439617?s=46&t=_wydb7OtauxFk1LsgQ9Mxw. This is vastly different than proselytizing. The Wisconsin Supreme Court failed to understand that in the Catholic Church, evangelizing is done not by words, but by good acts that show the beauty and power of the Catholic faith.

B. Charity Is an Indispensable Expression of the Church’s Very Being.

The Wisconsin Supreme Court failed to consider any of the great volumes of Catholic social teaching,

suiting than government to provide essential social services to people who are suffering and in need. If Petitioners followed the Wisconsin Supreme Court’s criteria for the religious purposes exemption, such as requiring recipients of their social services to participate in religious training or disseminating religious materials to the people they serve, then they would violate state and federal laws regarding the permitted use of government funds and would likely lose those funds, resulting in millions of people not receiving critical services. *Hunt v. McNair*, 413 U.S. 734, 743 (1973); *Mitchell v. Helms*, 530 U.S. 793, 808 (2000) (plurality opinion).

including the Compendium of the Social Doctrine of the Church and papal teachings, on the topic of charitable activities as the core mission of the Catholic Church and essential to the Catholic religion. See, e.g., Pontifical Council for Justice and Peace, *Compendium of the Social Doctrine of the Church*, ¶¶ 66–67, 184, 208, 581 (2004). Catholic social doctrine is rooted in the teachings of Jesus Christ. In the Gospel of St. Matthew, Catholics are taught that serving others is a requirement of the faith:

Whoever wants to be a leader among you must be your servant, and whoever wants to be first among you must become your slave. For even the Son of Man came not to be served but to serve others and to give his life as a ransom for many.

Matthew 20:25–28. Helping persons in need is foundational to the Catholic faith: “For I was hungry and you gave me something to eat, I was thirsty and you gave me something to drink, I was a stranger and you invited me in.” *Id.* at 25:35.

In his papal encyclical *Deus Caritas Est* (God is Love), Pope Benedict XVI wrote:

Thus far, two essential facts have emerged from our reflections:
a) The Church's deepest nature is expressed in her three-fold responsibility: of proclaiming the word of God (*kerygma-martyria*), celebrating the

sacraments (*leitourgia*), and exercising the ministry of charity (*diakonia*). These duties presuppose each other and are inseparable. For the Church, charity is not a kind of welfare activity which could equally well be left to others, but is a part of her nature, an indispensable expression of her very being.

b) The Church is God's family in the world. In this family no one ought to go without the necessities of life. Yet at the same time *caritas-agape* extends beyond the frontiers of the Church. The parable of the Good Samaritan remains as a standard which imposes universal love towards the needy whom we encounter "by chance" (cf. *Lk* 10:31), whoever they may be. Without in any way detracting from this commandment of universal love, the Church also has a specific responsibility: within the ecclesial family no member should suffer through being in need.

Pope Benedict XVI, *Deus Caritas Est*, ¶ 25 (2005) (citations omitted).

In a subsequent encyclical, *Caritas in Veritate*, Pope Benedict XVI wrote:

Charity is at the heart of the Church's social doctrine. Every responsibility and every commitment spelt out by that doctrine is derived from charity which, according to the teaching of Jesus, is the

synthesis of the entire Law (cf. Mt 22:36–40). It gives real substance to the personal relationship with God and with neighbour; it is the principle not only of micro-relationships (with friends, with family members or within small groups) but also of macro-relationships (social, economic, and political ones). For the Church, instructed by the Gospel, charity is everything because, as Saint John teaches (cf. 1 Jn 4:8, 16) and as I recalled in my first, “God is love” (*Deus Caritas Est*): *everything has its origin in God's love, everything is shaped by it, everything is directed towards it*. Love is God's greatest gift to humanity, it is his promise and our hope.

Pope Benedict XVI, *Caritas in Veritate*, ¶ 2 (2009) (emphasis in the original).

The teachings of Pope Benedict establish that: (1) exercising the ministry of charity is an essential element of the Catholic Church's three-fold responsibility; (2) charity is “an indispensable expression of [the Church's] very being;” (3) the Church has a specific responsibility to help those who are suffering; and (4) charity is “at the heart of the Church's social doctrine.” Therefore, it is impossible to separate the Church's works of charity from the essence of the Catholic Church. All such charitable works are conducted for religious purposes.

In addition to papal edicts, the Church has developed an entire body of religious law contained in

the Code of Canon Law, which is the fundamental body of ecclesiastical laws for the Church and which further reflects the Catholic command for charity. “The Church engages not only in divine worship but also in apostolic and charitable works. These vary according to the conditions of time and place but along with word and sacrament are constitutive of the mission of the Church and are to be supported by all.” Coriden, J. A., *et al.*, *The Code of Canon Law: A Text and Commentary*, 156 (1985).

Jesus taught the Corporal Works of Mercy, the “charitable actions by which we help our neighbors in their bodily needs.” United States Conference of Bishops, *The Corporal Works of Mercy*, www.usccb.org/beliefs-and-teachings/how-we-teach/new-evangelization/jubilee-of-mercy/the-corporal-works-of-mercy. Among the Corporal Works of Mercy are the mandates from Jesus to feed the hungry, give drink to the thirsty, shelter the homeless, and support the poor. The lower courts are correct that secular organizations also do these things; however, that does not change the fact that Catholic Charities members do them as a requirement of the Catholic faith and as an integral part of the Church’s evangelization.

In short, the charitable works of the Catholic Church are fundamental to and inseparable from the core of the Catholic faith. Overseen by our Bishops, they are, in all respects, carried out for “religious purposes.” Wis. Stat. § 108.02(15)(h)2. Charitable works in the Catholic tradition are not merely

examples of faith; they are the essence of the faith, and they must be done without proselytizing.

II. CATHOLIC CHARITIES ARE THE CHARITABLE ARM OF THE CATHOLIC CHURCH.

The Church's charitable organizations, on the other hand, constitute an opus proprium, a task agreeable to her, in which she does not cooperate collaterally, but acts as a subject with direct responsibility, doing what corresponds to her nature.

Deus Caritas Est, ¶ 29.

The Church exercises its “direct responsibility” to do charitable work through an international network of charitable organizations under the umbrella name *Caritas Internationalis*. In the United States, these organizations are known as Catholic Charities. CCUSA is a member of *Caritas Internationalis* (“*Caritas*”), the pontifical charitable entity located in the Vatican and under the jurisdiction of the Holy See. *Caritas*’ vision statement provides:

Caritas Internationalis is at the heart of the Church’s mission:

Its member organizations link together in a confederation to serve the world’s poor, vulnerable, dispossessed and marginalized. Caritas is inspired by Scripture, Catholic Social Teaching and

by the experiences and hopes of people who are disadvantaged and living in poverty.

We work with people of all faiths and those who have none.⁶

The purpose of these organizations is not to attempt to compel people who are suffering to join the Catholic faith, as the Supreme Court would require, but rather to serve people living in poverty, in vulnerable populations, and in need – terms the Church defines broadly. They provide help and hope to all suffering persons regardless of those persons' faith.

In a recent address to the General Assembly of *Caritas*, Pope Francis stated:

[t]he identity of *Caritas Internationalis* depends directly on the mission it has received. What distinguishes it from other agencies working in the social sphere is its ecclesial vocation. And what specifies its service within the Church, compared to many other ecclesial associations and institutions devoted to charity, is its task of assisting and supporting the Bishops in their exercise of pastoral *caritas*.

Address of His Holiness Pope Francis to the Participants in the General Assembly of *Caritas Internationalis*, Clementine Hall (May 11, 2023). In

⁶ *Caritas, Our Vision*, www.caritas.org/who-we-are/vision.

his *motu proprio*⁷ *On the Service of Charity*, Pope Benedict XVI established and decreed:

In addition to observing the canonical legislation, the collective charitable initiatives to which this *Motu Proprio* refers are required to follow Catholic principles in their activity and they may not accept commitments which could in any way affect the observance of those principles.

. . . [Any] agency [of the Church] has the duty to inform the Bishops of other Dioceses where it operates and to respect the guidelines for the activities of the various charitable agencies present in those Dioceses.

It is the responsibility of the diocesan Bishop to ensure that in the activities and management of these agencies the norms of the Church's universal and particular law are respected, as well as the intentions of the faithful who made donations or bequests for these specific purposes.

The Bishop is to encourage in every parish of his territory the creation of a local *Caritas* service or a similar body.⁸

⁷ A *motu proprio* is a legal document issued by a pope under his personal authority to the Roman Catholic Church. A *motu proprio* has the effect of a binding law in the Church.

⁸ Pope Benedict XVI, *On the Service of Charity*, Articles 1, 3-4, 9 (2012) (citations omitted).

Each Catholic Charities agency is a separate legal entity under the auspices of the Catholic bishop in the diocese where the agency is located. The agencies serve as the charitable arm of the bishop and are integral to the work and service of the bishop to the people of his diocese. Suggesting otherwise, as the Wisconsin Supreme Court opinion does, impermissibly substitutes the Court's interpretation of the Catholic faith for that of its Popes and Bishops.

As a matter of Church law, America's Bishops are responsible for creating a Catholic Charities (*Caritas*) agency in their diocese, requiring the agency to follow Catholic Social Doctrine and Church guidelines including those regarding charity, overseeing the activities of the agency, and "ensur[ing] that in the activities and management of these agencies, the norms of the Church's universal and particular law are respected." Catholic Charities agencies and their activities are inextricably tied to the Bishops' role and therefore are inherently and necessarily religious activities.

III. THE COURT'S DECISION MUST HARMONIZE THE LEGITIMATE INTERESTS OF STATES IN TAXATION WITHOUT REQUIRING RELIGIONS TO CHANGE HOW THEY PRACTICE THEIR FAITH.

CCUSA does not take a position on the underlying merits of this case. CCUSA recognizes the long-established rule that deference should be afforded to a state in the interpretation of its own tax laws. CCUSA also understands and respects the long-

established law in the United States that not all activities of religious organizations are religious activities. That is why, for example, we have the concept of UBIT (unrelated business income tax) and why engaging in certain activities can lead to revocation of the nonprofit status of a religious organization. CCUSA does not advocate giving religious organizations an unfair competitive edge over secular businesses through the exploitation of their nonprofit status.

However, those concepts are completely separate, and must be distinguished, from the uninformed, inaccurate, and discriminatory determination by the Wisconsin Supreme Court that unless a Catholic religious organization violates the tenets of the Catholic faith and proselytizes while providing services to people living in poverty and in vulnerable populations, the organization is not engaged in religious activities. That portion of the Court's holding must be rejected to avoid a crippling effect on Catholic Charities agencies nationwide.

CONCLUSION

For the reasons stated, to the extent the decision of the Wisconsin Supreme Court is based on the premise that Petitioners do not proselytize while providing services, the decision should be overturned.

Respectfully submitted,

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