Nos. 25-243, 25-273, 25-274

In the Supreme Court of the United States

WES ALLEN, SEC'Y OF STATE, ET AL., *Petitioners*,
v.
MARCUS CASTER, ET AL., *Respondents*.

WES ALLEN, SEC'Y OF STATE, ET AL., *Appellants*,
v.
BOBBY SINGLETON, ET AL., *Appellees*.

WES ALLEN, SEC'Y OF STATE, ET AL., *Appellants*,
v.
EVAN MILLIGAN, ET AL., *Appellees*.

ON PETITION FOR WRIT OF CERTIORARI BEFORE JUDGMENT TO THE UNITED STATES COURT OF APPEALS FOR THE ELEVENTH CIRCUIT AND ON APPEALS FROM THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ALABAMA

BRIEF FOR THE STATE OF LOUISIANA AND 15 OTHER STATES AS *AMICI CURIAE* SUPPORTING PETITIONERS

ELIZABETH B. MURRILL
Attorney General
LOUISIANA DEPARTMENT OF JUSTICE
1885 N. Third St.
Baton Rouge, LA 70802
(225) 506-3746
AguinagaB@ag.louisiana.gov

J. BENJAMIN AGUIÑAGA
Solicitor General
Counsel of Record
ZACHARY FAIRCLOTH
Principal Deputy
Solicitor General
MORGAN BRUNGARD
Deputy Solicitor General
CAITLIN HUETTEMANN
ELIZABETH BROWN
Assistant Solicitors General

Counsel for Amicus Curiae *State of Louisiana*

(additional counsel listed after signature page)

October 3, 2025

TABLE OF CONTENTS

TABLE OF AUTHORITIES

Cases **Page(s)**

Other Authorities

INTEREST OF *AMICI CURIAE*

The States of Louisiana, Alaska, Arkansas, Florida, Georgia, Idaho, Indiana, Iowa, Kansas, Mississippi, Missouri, Nebraska, South Carolina, Tennessee, Texas, and West Virginia respectfully submit this brief as *amici curiae* in support of Petitioners.[1]

Like the State of Alabama, the *amici* States "want[] out of this abhorrent system of racial discrimination." Supp. Br. for Appellant in *Louisiana v. Callais*, No. 24-109, at 47 (U.S. Aug. 27, 2025). "[R]ace-based state action" should be forbidden "except in the most extraordinary case." *Students for Fair Admissions, Inc. v. President & Fellows of Harvard Coll. (SFFA)*, 600 U.S. 181, 208 (2023). In 1965, the Nation faced an "extraordinary problem." *Shelby County v. Holder*, 570 U.S. 529, 534 (2013). But "[t]hanks in part to" the Voting Rights Act, "2025 is not 1965." Br. of Alabama et al. as *Amici Curiae* in *Louisiana v. Callais*, No. 24-109 at 1 (U.S. Sept. 24, 2025) (citing *Nw. Austin Mun. Utility Dist. No. One v. Holder*, 557 U.S. 193, 202 (2009)).

Today, however, Section 2's race-based command that States intentionally create majority-minority districts—often at the behest of a federal judge—violates the Constitution. "Redistricting is never easy." *Abbott v. Perez*, 585 U.S. 579, 585 (2018). But Section 2's mandate makes it virtually impossible for the States. Just ask Washington, Louisiana, Mississippi, Alabama,

---

[1] Pursuant to Rule 37.2, on September 23, 2025, counsel for *amicus* State of Louisiana provided the parties' counsel with notice of its intention to file this brief.

and Georgia, all of which have lost their maps to Section 2 in this redistricting cycle alone. And it has "no end … in sight." *SFFA*, 600 U.S. at 213.

When a State is compelled to sort its people by race under the thumb of a federal court, the State loses, its citizens lose, the judiciary loses, and the Nation's founding principles lose force. It is time to end this perpetual "lose-lose situation." *Alexander v. S.C. NAACP*, 602 U.S. 1, 65 (2024) (Thomas, J., concurring). For the sake of the States, our citizens, the courts, and this Nation, this Court should bring it to an end now.

INTRODUCTION AND SUMMARY OF THE ARGUMENT

This Court has dismantled government discrimination on the basis of race in every corner of American life over the last 75 years. *See SFFA*, 600 U.S. at 204–05. Yet in 2025, Section 2 of the VRA still "insists that districts be created precisely because of race." *Abbott*, 585 U.S. at 586. That government-mandated racial discrimination cannot be squared with the core of the Equal Protection Clause: that government "may never use race as a stereotype or negative." *SFFA*, 600 U.S. at 213.

Race-based redistricting is antithetical to "the Constitution's pledge of racial equality." *Id.* at 205. It rests on "the offensive and demeaning assumption that voters of a particular race, because of their race, 'think alike, share the same political interests, and will prefer the same candidates at the polls.'" *Miller v. Johnson*, 515 U.S. 900, 912 (1995). It uses race as a nega-

tive in this zero-sum context by advantaging some people at the expense of others based on their skin color. *See SFFA*, 600 U.S. at 212. And if that "were not enough," race-based redistricting under Section 2 also "lack[s] a 'logical end point.'" *Id.* at 221.

Respectfully, it is "remarkably wrong" for courts—or States coerced by courts—to be "pick[ing] winners and losers based on the color of their skin." *Id.* at 229–30. Racial classifications "are by their very nature odious to a free people whose institutions are founded upon the doctrine of equality." *Shaw v. Reno (Shaw I)*, 509 U.S. 630, 643 (1993) (quoting *Hirabayashi v. United States*, 320 U.S. 81, 100 (1943)). And the use of race in race-based admissions programs is odious "[j]ust like" the "drawing [of] district lines" to create majority-minority districts under Section 2. *SFFA*, 600 U.S at 361 n.34 (Sotomayor, J., dissenting).

"Eliminating racial discrimination means eliminating all of it." *Id.* at 206 (maj. op.). Now is the time to bring this "sordid business" to an end. *LULAC v. Perry*, 548 U.S. 399, 511 (2006) (Roberts, C.J., concurring in part, concurring in the judgment in part, and dissenting in part). The Court should grant certiorari and make plain that the Constitution does not tolerate government-mandated line drawing on the basis of race. That is the only way to become "a society that is no longer fixated on race." *Id.* at 434 (maj. op.).

ARGUMENT

I. RACIAL CLASSIFICATIONS ARE ANTITHETICAL TO EQUAL JUSTICE UNDER LAW.

The Equal Protection Clause provides that "[n]o State shall … deny to any person within its jurisdiction the equal protection of the laws." U.S. Const. amend. XIV, § 1. "Its central purpose is to prevent States from purposefully discriminating between individuals on the basis of race." *Shaw I*, 509 U.S. at 642. "Laws that explicitly distinguish between individuals on racial grounds fall within the core of that prohibition" and are therefore "presumptively invalid[.]" *Id.* at 642–43 (quoting *Personnel Adm'r of Mass. v. Feeney*, 442 U.S. 256, 272 (1979)).

For nearly 75 years, this Court has expelled race-based government action from American life on that presumption. After *Brown v. Board of Education*, 347 U.S. 483 (1954), the Court invalidated racial segregation in schools, juries, neighborhoods, parks, buses, and beyond—holding fast to "the Constitution's pledge of racial equality." *SFFA*, 600 U.S. at 204–05. Most recently in *SFFA*, the Court applied the same rule to elite universities' race-conscious admissions: "'[O]utright racial balancing' is 'patently unconstitutional,'" *id.* at 223 (quoting *Fisher v. Univ. of Tex. at Austin*, 570 U.S. 297, 311 (2013)), so admissions programs that "effectively assure[d] that race will always be relevant" could not stand, *id.* at 224 (quoting *City of Richmond v. J.A. Croson Co.*, 488 U.S. 469, 495 (1989) (plurality op.)).

In our Nation, "the individual is important, not his race, his creed, or his color." *Shaw I*, 509 U.S. at 648

(quoting *Wright v. Rockefeller*, 376 U.S. 52, 66 (1964) (Douglas, J., dissenting)). Government classifications by race "demean[] the dignity and worth of a person to be judged by ancestry instead of by his or her own merit and essential qualities." *SFFA*, 600 U.S. at 220 (quoting *Rice v. Cayetano*, 528 U.S. 495, 517 (2000)). They also "reinforce the belief ... that individuals should be judged by the color of their skin," *Shaw I*, 509 U.S. at 657, and thus provoke "a politics of racial hostility," *Croson*, 488 U.S. at 493 (plurality op.). Such stereotyping inflicts "continued hurt and injury" on individuals and society alike "contrary as it is to the 'core purpose' of the Equal Protection Clause[.]" *SFFA*, 600 U.S. at 221 (citation omitted). Put otherwise, government-mandated racial classifications are irreconcilable with equal justice under law.

This Court has therefore rightly described racial classifications as "odious to a free people whose institutions are founded upon the doctrine of equality." *Shaw I*, 509 U.S. at 643 (quoting *Hirabayashi*, 320 U.S. at 100). Uniquely odious—even "danger[ous]"—are "[r]acial classifications with respect to voting[.]" *Id.* at 657. When governments draw districts by race, it reinforces "impermissible racial stereotypes" by perpetuating "the assumption that members of the same racial group—regardless of their age, education, economic status, or the community in which they live—think alike[.]" *SFFA*, 600 U.S. at 220 (quoting *Schuette v. BAMN*, 572 U.S. 291, 308 (2014) (plurality op.)). Mandating such racial classifications, as the Court has warned, "may balkanize us into competing racial factions" and "threaten[s] to carry us further from the goal of a political system in which race no longer matters—a goal that the Fourteenth and Fifteenth

Amendments embody, and to which the Nation continues to aspire." *Shaw I*, 509 U.S. at 657.

The harms to States are equally grave. A legislature compelled to sort its citizens based on "the color of their skin" "bears an uncomfortable resemblance to political apartheid." *Id.* at 647. But if the State refuses to sort its citizens by race, it is accused of bigoted "racial voter suppression." *See, e.g.*, *Fifth Circuit Sides with Black Louisianans, Strikes Down Racially Discriminatory State Map*, Legal Defense Fund (Aug. 14, 2025), tinyurl.com/4ja89emh. Either way, States face endless litigation, astronomical expense, and erosion of their sovereign responsibility to draw districts. *See Abbott*, 585 U.S. at 608, 611.

Race-based redistricting also corrodes the federal judiciary into "pick[ing] winners and losers based on the color of their skin." *SFFA*, 600 U.S. at 229. Louisiana's recent experience illustrates the problem: The Middle District declared that the State must create an additional majority-Black district. *Robinson v. Ardoin*, 605 F. Supp. 3d 759, 766 (M.D. La. 2022). Then, only extraordinary mandamus relief from the Fifth Circuit prevented the court from imposing its own map within five legislative days when the legislature did not comply. *In re Landry*, 83 F.4th 300, 304 (5th Cir. 2023). Through it all, the court's message was clear: By not creating a second majority-Black district, Louisiana had failed to "pick[] the right race[] to benefit," so the Middle District would pick instead. *Cf. SFFA*, 600 U.S. at 229. That "remarkably wrong" exercise of the judicial power, *id.* at 230, now repeats across the country each redistricting cycle—ensuring that federal judges

are the arbiters of who wins and who loses based on skin color.

Race-based redistricting also strikes at the heart of the Nation's founding commitments. Among the truths we declared self-evident was that "all men are created equal." Declaration of Independence ¶ 2. The Fourteenth Amendment ensured that "no State shall … deny to any person … the equal protection of the laws." U.S. Const. amend. XIV, § 1. And etched in marble on the Supreme Court building: "Equal Justice Under Law." Those promises are hollow so long as government *compels* racial discrimination by the States.

The invidious classifications underlying race-based redistricting present the last significant battle in defense of our "color blind" Constitution. Supp. Br. for Appellants on Reargument in Nos. 1, 2, and 4, and for Respondents in No. 10, in *Brown v. Bd. of Educ.*, O.T. 1953, p. 65; *Plessy v. Ferguson*, 163 U.S. 537, 559 (1896) (Harlan, J., dissenting); *see SFFA*, 600 U.S. at 207 (identifying the only two narrow circumstances "permit[ting] resort to race-based government action"). But this battle is easy. For "[e]liminating racial discrimination means eliminating all of it"—that includes race-based redistricting. *SFFA*, 600 U.S. at 206.

II. SECTION 2 OF THE VOTING RIGHTS ACT PROVIDES NO SHIELD FOR RACE-BASED REDISTRICTING.

Because racial classifications are presumptively invalid, the only question is whether Section 2 of the VRA displaces that presumption. It does not. This Court has assumed—but never decided—that race-

based redistricting in the name of Section 2 is constitutional. It is not, for two independent reasons: (A) it violates fundamental equal-protection principles, and (B) it fails strict scrutiny.

A. Race-based redistricting is unconstitutional for the same reasons that doomed the race-conscious admissions programs in *SFFA*. It rests on stereotypes, it employs race as a negative, and it lacks any logical endpoint. 600 U.S. at 231; *see id.* at 314 (Kavanaugh, J., concurring). That is unsurprising—because the use of race in admissions was "[j]ust like drawing district lines" to create majority-minority districts under Section 2. *Id.* at 361 n.34 (Sotomayor, J., dissenting).

Race-based redistricting rests on categorically unconstitutional stereotypes. The first of "the twin commands of the Equal Protection Clause" is that government "may never use race as a stereotype." *Id.* at 213, 218 (maj. op.). "[T]his Court has rejected the assumption that members of the same racial group—regardless of their age, education, economic status, or the community in which they live—think alike[.]" *Id.* at 220 (quoting *Schuette*, 572 U.S. at 308) (quotation marks omitted). To that end, the Court has repudiated "the notion that government actors may intentionally allocate preference to those 'who may have little in common with one another but the color of their skin.'" *Id.* (quoting *Shaw I*, 509 U.S. at 647). Those stereotypes proved fatal in *SFFA*. *E.g.*, *id.* at 220 (Harvard

"rest[ed] on the pernicious stereotype that 'a black student can usually bring something that a white person cannot offer.'" (citation omitted)). So too here.

Race-based redistricting's stereotypes are more pernicious. Baked into any analysis under *Thornburg v. Gingles*, 478 U.S. 30 (1986), is the offensive (and wrong) assumption "that members of the same racial group—regardless of their age, education, economic status, or the community in which they live—think alike, share the same political interests, and will prefer the same candidates at the polls." *Shaw I*, 509 U.S. at 647; *but see* Hannah Hartig et al., 2. *Voting patterns in the 2024 election*, Pew Res. Ctr. (June 26, 2025), tinyurl.com/2umdx5wb. More fundamentally, "[t]he whole point" is to draw districts "with an express target in mind": That minority voters must form a 50%+ majority and non-minority voters form a less-than-50% minority. *Allen v. Milligan*, 599 U.S. 1, 33 (2023). It pays zero regard for *which* individuals meet that racial quota—just "race for race's sake." *SFFA*, 600 U.S. at 220. That cannot be squared with "[t]he core guarantee of equal protection[.]" *Flowers v. Mississippi*, 588 U.S. 284, 299 (2019). Race-based redistricting is directly contrary to the central "command[] of the Equal Protection Clause"—that the government "may never use race as a stereotype." *SFFA*, 600 U.S. at 213, 218.

Race-based redistricting also violates the second twin command of equal protection: that "government

may never use race as a … negative." *Id.* at 213. Universities in *SFFA* resisted that charge by claiming they simply *preferred* some races, without punishment to others. *Id.* at 218. But the Court found that "hard to take seriously": "How else but 'negative' can race be described if, in its absence, members of some racial groups would be admitted in greater numbers than they otherwise would have been?" *Id.* at 218–19.

The same question lingers for race-based redistricting. Redistricting is "zero-sum," *id.* at 219, for under one-person-one-vote, there are a finite number of citizens who may be assigned to any given district, *see Allen*, 599 U.S. at 99 (Alito, J., dissenting); *Rucho v. Common Cause*, 588 U.S. 684, 706 (2019) (creating a safe district for one party "comes at the expense ... of individuals in [that district who are members of] the opposing party"). In other words, "[a] benefit provided to some [voters] but not to others necessarily advantages the former group at the expense of the latter." *SFFA*, 600 U.S. at 218–19. Race-based redistricting is thus the very definition of race as a negative.

"If all this were not enough," race-based redistricting is unlawful because it "lack[s] a 'logical end point.'" *Id.* at 221 (quoting *Grutter v. Bollinger*, 539 U.S. 306, 342 (2003)). "[A] 'deviation from the norm of equal treatment of all racial and ethnic groups' must be 'a temporary matter'—or stated otherwise, must be 'limited in time.'" *Id.* at 311 (Kavanaugh, J., concurring)

(quoting *Croson*, 488 U.S. at 510 (plurality op.)). Under no circumstance may "racial classifications … continue indefinitely." *Id.* at 314.

There can be no dispute that Section 2's race-based redistricting mandate is neither "'a temporary matter'" nor "'limited in time.'" *Id.* at 311 (quoting *Croson*, 488 U.S. at 510). That mandate has existed for more than four decades—and there is no end in sight. In the current cycle alone, Louisiana, Mississippi, Alabama, Georgia, and Washington have lost cases requiring new majority-minority districts. *See* Supp. Br. for Appellant in *Louisiana v. Callais*, No. 24-109, at 26–27 (U.S. Aug. 27, 2025) (collecting citations). And the length courts have taken to strike down those maps are as strained as the "subliminal message" of a registrar's office sharing a floor with a sheriff's office, *Nairne v. Ardoin*, 715 F. Supp. 3d 808, 874 n.461 (M.D. La. 2024)—or worse, the abject falsehood that "David Duke … won three statewide elections" in Louisiana. *Robinson*, 605 F. Supp. 3d at 849. It seems the States can never shed "the burdens of history," *SFFA*, 600 U.S. at 404 (Jackson, J., dissenting), as plaintiffs continue a boundless crusade to find racism in the name of race-based redistricting, "'effectively assur[ing] that race will always be relevant ... and that the ultimate goal of eliminating' race as a criterion 'will never be achieved.'" *Id.* at 224 (maj. op.) (quoting *Croson*, 488 U.S. at 495). What may have begun as a temporary race-based remediation has become immortal. That, our Constitution does not permit.

B. Race-based redistricting under Section 2 also fails strict scrutiny. "'[R]acial classifications are simply too pernicious to permit any but the most exact connection between justification and classification.'" *SFFA*, 600 U.S. at 217 (quoting *Gratz v. Bollinger*, 539 U.S. 244, 270 (2003)). To that end, the Court has required "an exceedingly persuasive justification that is measurable and concrete enough to permit judicial review." *Id.* Race-based redistricting fails that test for at least four independent reasons.

First, Section 2 cannot shield otherwise unconstitutional state action. This Court has worried that "command[ing] that States engage in presumptively unconstitutional race-based districting" brings the VRA "into tension with the Fourteenth Amendment." *Miller*, 515 U.S. at 927 (citation omitted). That worry is well founded: Viewing Congress' authority under the subsequently enacted Fifteenth Amendment "as one part of a unified constitutional scheme," *Tenn. Wine & Spirits Retailers Ass'n v. Thomas*, 588 U.S. 504, 519–20 (2019), it blinks reality to think that Congress could cite the Fifteenth Amendment in "demand[ing] the very racial stereotyping the Fourteenth Amendment forbids," *Miller*, 515 U.S. at 928.

Second, Section 2 compliance is unlike the two narrow compelling interests that permit race-based government action. This Court has allowed race-based action only in two contexts: (1) "remediating specific, identified instances of past discrimination"; and (2) "avoiding imminent and serious risks to human

safety in prisons, such as a race riot." *SFFA*, 600 U.S. at 207. Both turn on specific harm and permit only a corresponding narrow, temporary remedy. But race-based redistricting pursuant to Section 2 does neither. In its heartland vote-dilution application, it depends only on "[a] generalized assertion of past discrimination," *Shaw v. Hunt (Shaw II)*, 517 U.S. 899, 909 (1996), which cannot be "the basis for [the] rigid racial preferences" inherent in race-based redistricting, *SFFA*, 600 U.S. at 226.

Third, Section 2 is too amorphous to be judicially reviewable. A classification "based on [] race 'requires more than ... an amorphous end to justify it.'" *Id.* at 214 (quoting *Parents Involved in Cmty. Sch. v. Seattle Sch. Dist. No. 1*, 551 U.S. 701, 735 (2007)). This Court has described the States' predicament well: "Since the Equal Protection Clause restricts consideration of race and the VRA demands consideration of race, a legislature attempting to produce a lawful districting plan is vulnerable to competing hazards of liability." *Abbott*, 585 U.S. at 587 (quotation marks and citation omitted). All the while, the Court "has struggled without success over the past several decades to discern judicially manageable standards for deciding [these] claims." *Rucho*, 588 U.S. at 691. States are left to litigate on standards "notoriously unclear and confusing," *Merrill v. Milligan*, 142 S. Ct. 879, 881 (2022) (Kavanaugh, J., concurring in grant of applications for stays), suffocating whatever "breathing room" state legislatures once enjoyed, *Bethune-Hill v. Va. State*

Bd. of Elections, 580 U.S. 178, 196 (2017). Four decades of uncertainty is enough to know that neither race-based redistricting under Section 2 nor any injury it purports to remedy "is measurable and concrete enough to permit judicial review." *SFFA*, 600 U.S. at 217.

Finally, race-based redistricting under Section 2 cannot be a compelling interest because it exceeds Congress's Fifteenth Amendment authority. Congress's enforcement power is "remedial, rather than substantive." *Allen*, 599 U.S. at 80 (Thomas, J., dissenting). But race-based redistricting flunks any congruence-and-proportionality review because, as Justice Thomas has explained, Congress never bothered to "'identif[y] a history and pattern' of actual constitutional violations that, for some reason, required extraordinary prophylactic remedies[.]" *Id.* at 82 (alteration added).

III. An Enduring Rejection of Race-Based Redistricting Requires Zero Tolerance for Any Consideration of Race.

Race-based redistricting will not truly be at its end unless this Court forecloses every avenue for race to creep back in. Without such clarity, the next cycle will look like the last four—experts insisting that race "was a consideration" but "did not predominate," *Allen*, 599 U.S. at 31; courts crediting that testimony as "sincere," *Robinson*, 605 F. Supp. 3d at 838, and "credible," *Nairne*, 715 F. Supp. 3d at 858; and States once again compelled to redistrict on the basis of race.

This Court's precedent bar that result. If it was fatal that "race [was] determinative for at least some—if not many—of the [admitted] students" at Harvard, *SFFA*, 600 U.S. at 219, it is fatal where experts consider just a smidge of race, however sincerely. That accords with this Court's command that government action "may *never* use race as a stereotype or negative." *Id.* at 213 (emphasis added). If the Court even need go further, it should amend or overrule its racial-predominance precedents—*Miller* and its progeny—to make clear that if "race in the creation of a new district … is 'non-negotiable[,]' … then race is given *a* predominant role." *Allen*, 599 U.S. at 102 (Alito, J., dissenting) (emphasis added). And insofar as *Gingles* cannot be conducted constitutionally at all, *but see id.* at 64–65 (Thomas, J., dissenting); *id.* at 99–100 (Alito, J., dissenting), it too must be overruled.

The States desperately need clarity that has been absent from this Court's redistricting cases. Without that clarity, nothing will change in the endless waste of resources and millions of dollars that the States and the courts face after every redistricting cycle.

CONCLUSION

The petitions for writ of certiorari should be granted.

Respectfully submitted,

ELIZABETH B. MURRILL
Attorney General
LOUISIANA DEPARTMENT OF JUSTICE
1885 N. Third St.
Baton Rouge, LA 70802
(225) 506-3746
AguinagaB@ag.louisiana.gov

J. BENJAMIN AGUIÑAGA
Solicitor General
Counsel of Record
ZACHARY FAIRCLOTH
Principal Deputy Solicitor General
MORGAN BRUNGARD
Deputy Solicitor General
CAITLIN HUETTEMANN
ELIZABETH BROWN
Assistant Solicitors General

Counsel for Amicus Curiae *State of Louisiana*

(additional counsel listed below)

October 3, 2025

ADDITIONAL COUNSEL

STEPHEN J. COX
Attorney General
State of Alaska

TIM GRIFFIN
Attorney General
State of Arkansas

JAMES UTHMEIER
Attorney General
State of Florida

CHRISTOPHER M. CARR
Attorney General
State of Georgia

RAÚL R. LABRADOR
Attorney General
State of Idaho

THEODORE E. ROKITA
Attorney General
State of Indiana

BRENNA BIRD
Attorney General
State of Iowa

KRIS W. KOBACH
Attorney General
State of Kansas

LYNN FITCH
Attorney General
State of Mississippi

CATHERINE HANAWAY
Attorney General
State of Missouri

MICHAEL T. HILGERS
Attorney General
State of Nebraska

ALAN WILSON
Attorney General
State of South Carolina

JONATHAN SKRMETTI
Attorney General
State of Tennessee

KEN PAXTON
Attorney General
State of Texas

JOHN B. MCCUSKEY
Attorney General
State of West Virginia