No. 25-332

In the
Supreme Court of the United States

DONALD J. TRUMP, PRESIDENT OF THE UNITED STATES, ET AL.,

Petitioners,

v.

REBECCA KELLY SLAUGHTER, ET AL.,

Respondents.

On Writ of Certiorari Before Judgment
to the U.S. Court of Appeals for the
District of Columbia Circuit

BRIEF OF COLORADO, ILLINOIS, MINNESOTA, WASHINGTON, AND 19 STATES AS AMICI CURIAE IN SUPPORT OF RESPONDENTS

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INTEREST OF AMICI CURIAE

Amici are sovereign States and joint enforcers of the nation's antitrust and consumer protection laws. Amici States regularly work with the Federal Trade Commission ("FTC") to pool resources on investigations and litigation focused on protecting consumers and maintaining competition in the American economy. These FTC-State partnerships regularly occur on a bipartisan basis and span across administrations.

The FTC's structure as a bipartisan and expert agency enables that sort of cooperation. Commissioners from both sides of the aisle facilitate bipartisan state partnerships and stability, regardless of the party currently occupying the White House. And tenure protections for Commissioners allow them to accrue expertise and encourage actions taken based on sound professional judgment rather than partisan ideology. States benefit from that expertise and bipartisan cooperation and have a strong interest in ensuring that it continues.

SUMMARY OF THE ARGUMENT

For more than 100 years, the FTC has played a vital role in strengthening the American economy and safeguarding American consumers by preventing and remedying unfair competition and trade practices. Through rulemakings, adjudications, and enforcement actions, the FTC prevents monopolization, ensures a fair marketplace, and returns hundreds of millions of dollars annually to consumers harmed by unfair and deceptive conduct.

The agency's longstanding success flows in no small part from Congress's considered decision to structure the FTC as an expert, bipartisan agency led by five Commissioners with tenured terms. The tenure structure promotes expertise, continuity, and stability in the FTC's marketplace protection role and serves as a critical guardrail against improper influence by antitrust violators. It also facilitates durable cooperation across partisan lines between the FTC and the States, thus bolstering the States' sovereign role as joint enforcers of antitrust and consumer protection laws.

The FTC remains politically accountable to the President via the presidency's appointment of the FTC Chair and the opportunity to appoint two or more Commissioners each four-year term, as well as through the for-cause removal authority that the President may execute. The FTC is also accountable to Congress, through legislative oversight and the appropriations process, and the Judiciary, through judicial review of its decisions.

Eliminating the Commissioners' tenure protections would harm the FTC's ability to accomplish its nonpartisan mission and cause regulatory instability. It would allow a president to fundamentally transform the agency from the expert, deliberative, bipartisan body that Congress conceived. For example, a president could remove all members of opposing parties; or transform the agency into a single-headed agency; or even remove all Commissioners to prevent the agency from functioning entirely. Such transformation would strip the agency of its expertise and stability, all to the detriment of the public and the States that regularly work with the agency to protect consumers.

The limited tenure protections for FTC Commissioners are constitutionally sound. The Court should exercise extreme caution when invited to overrule deeply embedded Supreme Court precedent and undermine an agency that has successfully operated, as Congress designed it to operate, to great public benefit for more than 100 years.

ARGUMENT

I. Congress intentionally created an expert and bipartisan FTC to serve its consumer protection mission.

From the FTC's inception in 1914, Congress recognized its critical role in safeguarding the American economy, a matter "of a most exacting and difficult character." S. Rep. No. 63-597, at 10 (1914). Congress therefore carefully structured the agency to be bipartisan, led by five expert Commissioners, each with tenured terms. This structure allows Commissioners to accrue expertise and make decisions based on sound professional judgment rather than partisan politics. The tenure protections for Commissioners are a fundamental and essential part of that structure and the agency's longstanding success.

A. Seven-year staggered terms and bipartisan membership are key to the FTC's success.

First, the Commissioners have staggered seven-year terms. 15 U.S.C. § 41. The length of the term allows the Commissioners to "'acquire the expertness in dealing with these special questions concerning industry that comes from experience.'" *Hastings Mfg. Co. v. FTC*, 153 F.2d 253, 258 (6th Cir. 1946) (citing S. Rep. No. 63-597, at 11). And the staggering of their terms ensures that the Commission is not at any point "deprived" of experienced leadership. S. Rep. No. 63-597, at 11.

Structuring the terms in this way promotes stability and a "continuity of policy and the tempering of swings in priorities across administrations." Edith Ramirez, *The FTC: A Framework for Promoting Competition and Protecting Consumers*, 83 Geo. Wash. L. Rev. 2049, 2053 (2015). It also allows the FTC to invest more deeply in research and analysis pertaining to specific issues and industries, further strengthening its expertise. *See id.* This all furthers the Congressional goal of creating an agency with "'a continuous policy'" that "'would be free from the effect of such changing incumbency.'" Rachel E. Barkow, *Insulating Agencies: Avoiding Capture Through Institutional Design*, 89 Tex. L. Rev. 15, 24 (2010) (citing 51 Cong. Rec. 10,376 (1914)).

The FTC's structure helps to advance the law and public understanding of economics, through the FTC's comprehensive expert studies. For example, the FTC has conducted retrospective studies on the effectiveness of its remedies in merger cases, to further promote maintaining or restoring competition in relevant markets going forward.[1] The findings from those studies are then applied to future evaluations of merger remedies, and those policies are published so that industry is aware of what to expect going forward.[2] This leads to better enforcement and better outcomes for consumers, as well as more predictable advice to the

[1] *See* FTC, The FTC's Merger Remedies 2006–2012, A Report of the Bureaus of Competition and Economics (2017), https://coag.gov/app/uploads/2025/11/FTC-Merger-Remedies-2006-2012.pdf.

[2] *See id.* at 31–37 (explaining best practices that FTC would apply in evaluating merger remedies based on retrospective study).

markets. Because the FTC's work is not just retrospective, but also prospective, it fulfills an important predictive role on which industry relies.

The FTC studies issues of great concern to consumers, such as drug prices. In January 2025, the FTC published the second in a series of reports about the role of pharmacy benefit managers in driving up generic drug pricing.[3] These kinds of expert studies aid judicial decision-making by providing rigorous analysis and evidence-based guidelines and policies that courts can rely on. They also lead to improved and more transparent enforcement, which benefits industry and the public.

The States in turn rely on expert FTC studies to better understand the impact of mergers on their markets, identify emerging issues, and better protect consumers.

Second, the FTC has mandatory bipartisan membership, as no more than three Commissioners may be from the same political party. 15 U.S.C. § 41. This requirement fosters compromise, enhances decision-making, and promotes cooperation with broad, bipartisan groups of States. This characteristic follows the wisdom of a well-developed body of literature in organizational design that highlights how promoting transparency, encouraging challenging of views, and discouraging "group think" tends to lead to better re-

[3] FTC, Specialty Generic Drugs: A Growing Profit Center for Vertically Integrated Pharmacy Benefit Managers (2025), https://coag.gov/app/uploads/2025/11/Specialty-Generic-Drugs.pdf.

sults. *See, e.g.*, Irving L. Janis, *Groupthink: Psychological Studies of Policy Decision and Fiascoes* (2d ed. 1982).

FTC actions taken on a bipartisan basis, rather than along party lines, tend to be more long-lasting, thus preventing regulatory whipsawing. For example, in 2024, the FTC proposed substantial changes to the federal premerger notification form required to be filed for certain larger mergers. After significant public feedback and debate among the Commissioners, the FTC made changes to its initial proposal and the final version was approved unanimously by all five Commissioners.[4] Having adopted the new form on a bipartisan basis during the prior administration, the FTC is now defending the form in litigation.[5]

Other recent bipartisan accomplishments include the junk ticket and hotel fees rule, banning deceptive tactics used to bury fees for live-event ticketing and short-term lodging, and stricter enforcement against illegal right-to-repair restrictions.[6] These bipartisan

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[4] Chair Ferguson, at the time a minority Commissioner, explained: "My colleagues and I engaged in intense negotiations to separate the lawful wheat from the lawless chaff." Concurring Statement of Commissioner Andrew N. Ferguson, Premerger Notification; Reporting and Waiting Period Requirements, 89 Fed. Reg. 89216, 89408 (Nov. 12, 2024).

[5] *Chamber of Commerce v. FTC*, No. 6:25-cv-00009-JDK (E.D. Tex. filed Jan. 10, 2025).

[6] Press Release, FTC, Federal Trade Commission Announces Bipartisan Rule Banning Junk Ticket and Hotel Fees (Dec. 17, 2024), https://www.ftc.gov/news-events/news/press-releases/2024/12/federal-trade-commission-announces-bipartisan-rule-banning-junk-ticket-hotel-fees; Press Release, FTC, FTC to Ramp Up

actions all redound to the benefit of consumers by protecting them from unfair practices and promoting competition.

These results are also precisely what Congress envisioned. Congress empowered the FTC to undertake studies conducted by experts and to engage in deliberation and deep reflection when making decisions about rulemakings, investigations, and enforcement actions, all in service of advancing the law, aiding industry, and informing its consumer protection mission.

Even without unanimity, the presence of Commissioners from both sides of the aisle strengthens decision-making. Commissioners in the minority can publish dissents, which help to foster public debate, force the majority to defend its positions, and encourage transparency. Dissents may persuade a future majority of Commissioners or a federal court to take a different position from that initially articulated. Indeed, Chair Ferguson wrote over 400 pages of dissents during the previous administration, and explained that dissents can be "helpful for markets, for courts, for litigants, [and] for government transparency."[7] *See also FTC v. Fred Meyer, Inc.*, 390 U.S. 341, 363 n.2 (1968) (Stewart, J., dissenting) ("One Commissioner attempted in vain to persuade the Commission to accept the theory which the Court today adopts.").

Law Enforcement Against Illegal Repair Restrictions (July 21, 2021),https://www.ftc.gov/news-events/news/press-releases/2021/07/ftc-ramp-law-enforcement-against-illegal-repair-restrictions.

[7] Odd Lots: *FTC Chief Andrew Ferguson on the Trump Vision for Antitrust*, at 10:42 (Apple Podcasts, Mar. 17, 2025), transcription available at https://app.podscribe.com/episode/129659760.

Dissents are also an important tool to raise flags about a majority decision and to prevent agency capture by calling out potential undue influence by industry. *See PHH Corp. v. CFPB*, 881 F.3d 75, 185 (D.C. Cir. 2018) (Kavanaugh, J., dissenting) (dissent can serve "as a 'fire alarm' that alerts Congress and the public at large that the agency's decision might merit closer scrutiny") (quoting Barkow, *supra*, at 41).

Bipartisan membership also promotes and facilitates the FTC's frequent work with bipartisan multistate coalitions. Because investigations and enforcement actions are more likely to be based on expertise, sound professional judgment, and impartial analysis of the law and facts, they are more likely to engender trust and draw broader groups of States.[8]

B. The FTC's expertise and bipartisanship enhance public and market trust and protect against political and corporate influence.

The FTC's structure stands in contrast to that of the other federal antitrust enforcer, the Department of Justice ("DOJ"). The DOJ is led by the Attorney General, who is a member of the President's Cabinet and is removable by the President at will. After a troubling history of the DOJ being improperly influenced to enter weak settlements by antitrust violators, Congress passed the Tunney Act.[9] 15 U.S.C. § 16; *United*

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[8] *See infra*, Part II.A (providing examples of FTC-State bipartisan cooperation).

[9] Senator Tunney listed examples of the DOJ seemingly succumbing to pressure from large antitrust violators in supporting the legislation that came to bear his name. *See* 119 Cong. Rec. 24,598 (1973).

States v. CVS Health Corp., 407 F. Supp. 3d 45, 54 (D.D.C. 2019) (Congress sought to "ensure that the economic power and political influence of antitrust violators do not unduly influence the government into entering into consent decrees that do not effectively remedy antitrust violations." (citation modified)). The Tunney Act requires the DOJ to obtain court approval of all antitrust settlements and to explain the settlement's impact on competition and how it will remedy the alleged harm. 15 U.S.C. § 16. The court then must determine whether the settlement is in the public interest. *Id.* § 16(e)–(f).

There is no equivalent of the Tunney Act for the FTC. Instead, the FTC's structure is the mechanism intended to prevent the kinds of abuses the Tunney Act addresses with respect to DOJ actions. If that structure is eliminated and the President can remove Commissioners at will, there will be no guardrails on the FTC, and the FTC will be subject to the same kind of industry pressure that proved problematic with the DOJ prior to the Tunney Act.

In fact, Congress had precisely these kinds of concerns in mind when it created the FTC. The FTC was created following a period of as-then unprecedented corporate consolidation, coupled with worrisome Presidential interference at the DOJ in antitrust matters on behalf of industrial magnates. *See* Marc Winerman, *The Origins of the FTC: Concentration, Cooperation, Control, and Competition*, 71 Antitrust L.J. 1, at 6–7, 20–22 (2003). Congress thus determined to create an agency less likely to succumb to political interference and corporate influence, one of "prestige and independence" whose "decisions, coming from a board of several persons, will be more readily accepted as impartial and well considered." S. Rep. No. 63-597, at 11.

C. The FTC remains politically accountable.

Notwithstanding the tenure protections for Commissioners, the FTC remains politically accountable and subject to Presidential direction and judicial review. The President is empowered to appoint the FTC's Chair, a position with significant influence on the agency's agenda, priorities, and strategic approach. *See PHH Corp*., 881 F.3d at 190 (Kavanaugh, J., dissenting) ("By exercising their power to appoint chairs of the major multi-member independent agencies, Presidents may gain some control over the direction of those agencies within days of taking office at the start of their first terms."). And if the President is displeased with the Chair, he is free to appoint a different Chair at any time. The staggering of the Commissioners' terms also ensures that the President retains substantial influence over the FTC by providing the opportunity to appoint two or more Commissioners during a four-year term. *See* 15 U.S.C. § 41.

The FTC also remains accountable to Congress through legislative oversight and the appropriations process. And the FTC ultimately acts through the courts, meaning that its decisions are subject to judicial review. 15 U.S.C. § 45(c). The FTC therefore is not some rogue operator; to the contrary, it is held accountable by all three branches of government.

II. The FTC's structure promotes FTC–State cooperation.

The States, as joint and sovereign enforcers of antitrust and consumer protection laws, have a strong interest in preserving the FTC's mission to safeguard competition and protect consumers. The FTC's bipartisan, expert structure lends to increased partnership and cooperation with the States in complex matters, providing great public benefit.

A. States routinely partner with the FTC in a bipartisan manner.

The States routinely partner with the FTC through joint or complementary actions. In the antitrust arena, for example, a bipartisan group of eight States and the District of Columbia joined the FTC to block a merger between two of the largest supermarket operators in the country, which would have resulted in significantly higher grocery prices for consumers. *FTC v. Kroger Co.*, No. 3:24-cv-00347-AN, 2024 WL 5053016 (D. Or. Dec. 10, 2024). On that same merger, Colorado and Washington filed parallel actions to block the merger in their respective state courts, and they continued to coordinate with the FTC through the litigation.[10]

In another matter, a coalition of 49 States obtained a $125 million antitrust settlement against biopharmaceutical company Cephalon, facilitated by an

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[10] Other recent and ongoing examples of bipartisan multistate groups litigating jointly with the FTC on antitrust matters include litigation against Amazon for anticompetitive behavior, *FTC v. Amazon.com, Inc.*, No. 2:23-cv-01495 (W.D. Wash. filed Sep. 26, 2023), and litigation against pesticide manufacturers, *FTC v. Syngenta Crop Protection AG*, No. 1:22-cv-00828 (M.D.N.C. filed Sep. 29, 2022).

FTC lawsuit and settlement stemming from Cephalon's alleged illegal blocking of generic competition to its sleep-disorder drug Provigil.[11]

Bipartisan cooperation also abounds in consumer protection matters. For example, the FTC and all 50 States obtained a settlement with Equifax, Inc., arising out of a massive data breach and alleged violation of privacy laws that required the company to pay at least $575 million, and up to $700 million, and to strengthen deficient security practices.[12] Similarly, the FTC and a bipartisan group of States won a lawsuit against Dish Network alleging millions of illegal telemarketing calls by Dish, obtaining injunctive relief and then a settlement of $210 million.[13] *See United*

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[11] Press Release, Connecticut Attorney General, State Joins $125 Million Multistate Antitrust Settlement with Cephalon for Efforts to Delay Provigil Competition (Aug. 4, 2016), https://portal.ct.gov/ag/press-releases-archived/2016-press-releases/state-joins-125-million-multistate-antitrust-settlement-with-cephalon-for-efforts-to-delay-provigil; Press release, FTC, FTC Settlement of Cephalon Pay for Delay Case Ensures $1.2 Billion in Ill-Gotten Gains Relinquished; Refunds Will Go to Purchasers Affected By Anticompetitive Tactics (May 28, 2015), https://www.ftc.gov/news-events/news/press-releases/2015/05/ftc-settlement-cephalon-pay-delay-case-ensures-12-billion-ill-gotten-gains-relinquished-refunds-will.

[12] Press Release, FTC, Equifax to Pay $575 Million as Part of Settlement with FTC, CFPB, and States Related to 2017 Data Breach (July 22, 2019), https://www.ftc.gov/news-events/news/press-releases/2019/07/equifax-pay-575-million-part-settlement-ftc-cfpb-states-related-2017-data-breach.

[13] A group of bipartisan States also recently filed a lawsuit with the FTC against Ticketmaster for unfair and deceptive practices regarding hidden fees on ticket sales. *FTC v. Live Nation Ent., Inc.*, 2:25-cv-08884 (C.D. Cal. filed Sep. 18, 2025).

States v. Dish Network, LLC, No. 3:09-cv-03073 (C.D. Ill. Dec. 4, 2020), Dkt. No. 868.

As these examples show, this tradition of bipartisan cooperation inures to the benefit of consumers and the economy writ large, and those accomplishments are a credit to the FTC's structure as an expert agency.

B. The FTC's structure does not undermine state sovereignty.

There is no merit to the argument presented by Florida and several other States that the FTC's tenure protections "threaten state sovereignty" or "represent one of the founding States' worst fears: the consolidation of power in one or a few democratically unaccountable officials." *See* Brief of Amici Curiae Florida, 22 Other States, and the Arizona Legislature in Support of Applicants at 7–8. That argument twists the founding principles. The principal fear of the founding era, of course, was despotism. Tenure protections for bipartisan multimember agencies was not a fear that anyone expressed in 1787. Nor is it a fear realized in practice. To the contrary, each of the Florida Amici States have worked extensively with the FTC for decades, under administrations from both parties, without qualms as to whether the agency's structure threatened their sovereignty.[14] These actions have enabled the Florida Amici States to stop illegal practices

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[14] *See* Cephalon, Equifax, Amazon, and Syngenta examples in Section II.A. Other recent and pending cases include: *FTC v. Harris Originals of NY, Inc.*, No. 2:22-cv-04260 (E.D.N.Y. filed July 20, 2022) (including Florida, Georgia, Idaho, Iowa, Kansas, and Louisiana as co-plaintiffs against company cheating military families through use of illegal financing and sales practices); *FTC*

harming their citizens and to return money to harmed consumers. The FTC's structure bolsters, rather than undermines, state sovereignty by encouraging federal-state partnership across party lines, increasing the States' reach and effectiveness in their sovereign role as joint enforcers of antitrust and consumer protection laws.

III. Eliminating the removal restrictions would harm the FTC's mission and create regulatory instability.

Eliminating the carefully crafted tenure protections for FTC Commissioners, and making them instead removable at will by the President, would fundamentally destroy the agency's role as an expert and bipartisan agency. Empowered with at-will removal authority, the President would be able to fire all Commissioners belonging to opposing political parties or even members of his own party deemed insufficiently obedient. Indeed, at-will removal authority would allow the President to transform the five-member Commission into a single-headed agency run by only the President's preferred Chair.[15] Or, the President conceivably could remove all Commissioners, preventing the Commission from functioning entirely.

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v. RivX Automation Corp., No. 1:24-cv-23152 (S.D. Fla. filed Aug. 19, 2024) (Florida as co-plaintiff against company engaged in deceptive practices in trucking industry).

[15] The FTC Act contains no quorum requirement, stating instead that "[a] vacancy in the Commission shall not impair the right of the remaining Commissioners to exercise all the powers of the Commission." 15 U.S.C. § 41. Agency regulations provide that "[a] majority of the members of the Commission in office and

In any event, an FTC led by Commissioners removable at will would directly contravene congressional intent and strip the FTC of its expertise. The seven-year term would be rendered a nullity, thus depriving the FTC—and the public—of the benefits that come with accruing experience through tenure. This is particularly damaging in the context of antitrust and complex consumer protection matters, which tend to span multiple years—and thus, multiple administrations—from the start of an investigation to the conclusion of litigation. States often partner with the FTC on these types of matters, and they traditionally have relied in confidence on the FTC's continued, good-faith participation, notwithstanding a change in administration, because the FTC's actions are based on sound professional judgment, rather than partisan politics.[16] If the FTC's structure changes, it could lead to uncertainty and disruption on these sorts of lengthy, expensive, and cross-administration matters.

It would also lead to potential regulatory whipsawing and uncertainty among industry participants. Partisan decisions are more likely to be overturned, and a partisan FTC would be more likely to make partisan decisions.

Upholding the President's unlawful firing of Commissioners from the opposing political party also

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not recused from participating in a matter (by virtue of 18 U.S.C. 208 or otherwise) constitutes a quorum for the transaction of business in that matter." 16 C.F.R. § 4.14(b) (2025).

[16] Take, for example, the FTC's monopolization claims against Meta. That case was filed in 2020 during the first Trump Administration, was litigated throughout the Biden Administration, and was ultimately taken to trial earlier this year.

serves to stifle dissent. The President already appoints his preferred Chair, and presently, the Republican party controls a majority of the FTC. Commissioner Slaughter's membership therefore would not prevent the majority from taking action on party lines—and in furtherance of the President's agenda—if it so chooses. But firing Commissioner Slaughter does prevent the public, and Congress, from hearing her dissenting voice; this includes dissents on the merits, as well as dissents that could call out parts of decision-making that contravene the public interest, like favorable enforcement decisions for the President's supporters or potential agency capture.

CONCLUSION

The Court should affirm the district court's judgment.

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