No. 25-949

In the Supreme Court of the United States

JOHN DOE 1 AND JOHN DOE 2,
Petitioners,

v.

X CORP., FKA TWITTER, INC.,
Respondent.

ON PETITION FOR WRIT OF CERTIORARI TO THE U.S. COURT OF APPEALS FOR THE NINTH CIRCUIT

BRIEF OF FLORIDA AND 16 OTHER STATES AS *AMICI CURIAE* IN SUPPORT OF PETITIONERS

JAMES UTHMEIER
Attorney General

RYAN D. NEWMAN
Chief Deputy Attorney General

OFFICE OF THE FLORIDA ATTORNEY GENERAL
PL-01, The Capitol
Tallahassee, Florida 32399
(850) 414-3300
Jason.Muehlhoff@myfloridalegal.com

DAVID M.S. DEWHIRST
Solicitor General
JEFFREY P. DESOUSA
Chief Deputy Solicitor General
Counsel of Record
JASON J. MUEHLHOFF
Chief Deputy Solicitor General
THOMAS F. KELLY
Fellow

March 12, 2026 *Counsel for Amici Curiae*

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INTEREST OF AMICI CURIAE*

As social-media use has exploded, so too has child sex abuse. That is no coincidence. Social-media platforms have given sexual predators unprecedented access to kids, and these platforms have loaded their products with design features that facilitate abuse. Platforms arm predators with tools like self-deleting messages, which conceal grooming, sextortion, and trafficking. They let adults pose as children when creating accounts. Their algorithms connect predators to each other, recommending to them accounts associated with child sexual abuse material. Platforms' search bars even help predators find child sexual abuse material by suggesting terms and hashtags to them.

Social-media companies know these features aid predators, yet they have refused to reform their products. That is because they have not had to answer for their role in the child-sexual-abuse epidemic. They have escaped liability by exploiting courts' expansion of "publisher" immunity under Section 230 of the Communications Decency Act. *See* 47 U.S.C. § 230.

Amici States have a significant interest in returning Section 230 to its proper scope. Courts' approach to the statute has hampered States' ability to protect children from sexual predators. States have historically used tort and unfair-trade-practices laws to protect their citizens from dangerous products, but Section 230's "mission creep" has defanged those laws

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* Amici States timely notified counsel for all parties of their intention to file this brief as required by Supreme Court Rule 37.2.

on the internet. *Force v. Facebook, Inc.*, 934 F.3d 53, 80 (2d Cir. 2019) (Katzmann, C.J., concurring in part and dissenting in part). This Court should grant certiorari, reverse the Ninth Circuit's decision, and rein in publisher immunity under Section 230.

SUMMARY OF ARGUMENT

1. Child sex abuse is rampant on social media. One out of every six kids is a victim of online sex abuse,[1] and law enforcement agencies are "besieged" by reports of child sexual abuse material on social media companies like X (formerly, Twitter).[2]

Social-media companies have fueled this epidemic of abuse by employing a host of design features that help predators abuse kids. The companies know the features facilitate abuse, but rather than fix them, the companies have doubled down on their nothing-to-see-here approach, using the same playbook that tobacco companies and opioid manufacturers deployed years ago. They cover up their wrongs and use their armies of lawyers to evade liability.

2. Social-media companies have escaped responsibility for their role in the child-sex-abuse epidemic because lower courts have wrongly granted them sweeping immunity under Section 230. Section

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[1] David Finkelhor et al., *Online Child Sexual Exploitation and Abuse Findings from a National Survey*, Crimes Against Children Research Center 2 (2023), https://perma.cc/A8J3-BG4L.

[2] Michael H. Keller & Gabriel J.X. Dance, *The Internet is Overrun with Images of Child Sexual Abuse. What Went Wrong*, N.Y. Times (Sep. 29, 2019), https://perma.cc/PG68-LLKC.

230 has a "narrow focus": It shields platforms from publisher liability, preventing them from being held strictly liable for transmitting defamatory content. *Doe ex rel. Roe v. Snap, Inc.*, 144 S. Ct. 2493, 2493 (2024) (Thomas, J., dissenting from denial of certiorari, joined by Gorsuch, J.). Yet lower courts have construed the statute as an "all purpose get-out-of-jail-free card," which immunizes platforms that host third-party content from defective-design claims, unfair-trade-practices claims, contract claims, and more. *Doe v. Internet Brands, Inc.*, 824 F.3d 846, 853 (9th Cir. 2016). That interpretation of Section 230 has stifled state efforts to protect kids from sexual predators. Social-media companies have exploited the interpretation to avoid liability for their defective products.

Nothing in Section 230 permits that incursion on states' traditional police power. To displace state laws regulating dangerous products, Congress must "make its intention to" do so "unmistakably clear in the language of" the preemption "statute." *Gregory v. Ashcroft*, 501 U.S. 452, 460 (1991) (quotations omitted). But Section 230 includes no language clearly displacing state products-liability regulations.

3. This case is an opportunity to rein in the judicial expansion of Section 230. The Ninth Circuit misconstrued Section 230 and granted X immunity for its own egregious conduct. This Court should reverse that decision and clarify the scope of Section 230.

The Ninth Circuit was wrong that Petitioners' sex-trafficking claims treat X as a publisher. The claims neither seek to hold X strictly liable nor punish it for any information posted by third parties. Petitioners

allege that X *knowingly* maintained and distributed child sexual abuse material—which is "illegal contraband," not mere information. *United States v. Kimbrough*, 69 F.3d 723, 731 (5th Cir. 1995).

But even if Petitioners' claims treat X as a publisher, Section 230's sex-trafficking carveout applies. *See* 47 U.S.C. § 230(e)(5)(A). Even assuming—as the Ninth Circuit held—that the carveout requires a platform to actively participate in sex trafficking, Plaintiffs' allegations are sufficient. Taking the allegations as true, X did not "merely turn[] a blind eye" to sex trafficking. *Doe 1 v. Twitter, Inc.*, 148 F.4th 635, 644 (9th Cir. 2025). Instead, it "help[ed] make [a sex-trafficking venture] succeed." *Twitter, Inc. v. Taamneh*, 598 U.S. 471, 497 (2023). Twitter knowingly pushed out to thousands of users child sexual abuse material depicting Petitioners. Those actions assisted the predators that abused Petitioners by distributing the material to potential buyers.

ARGUMENT

I. SOCIAL-MEDIA PLATFORMS ARE HOTBEDS OF CHILD SEX ABUSE.

Children are sexually abused every day on social media. Predators use Instagram, Snapchat, X, and other platforms to groom, sextort, and traffic kids. Evidence of their crimes pervades the platforms: There are millions of photos and videos of child sexual abuse material circulating on social media.[3] As Senators Marsha Blackburn and Richard Blumenthal

[3] Keller & Dance, *supra* n.2.

recently observed, platforms are "open-air market[s] for the sale of child sexual abuse material."[4] Predators use hashtags like "#pedowhore" and "#preteensex" to "advertise child-sex material for sale."[5] And their account profiles boast of "incest toddlers" and parade pictures of "teenager[s] with the word WHORE scrawled across [their] face[s]."[6]

Brandon Huu Le is one of the predators who used social media to abuse children.[7] Using Snapchat, Le "contact[ed] at least 270 girls," and "[i]f a girl responded," he "turned the conversation to sexual topics" and coerced her into sexual acts.[8] Le would first "threaten[] to publicly disclose the sexually charged conversation unless the girl sent him an explicit picture" ("Either f-----g send the pic now or I'm not gonna give your [sic] anymore chances.").[9] But after the girl sent the picture, Le would only escalate his threats. He would "threaten[] to release the picture unless the girl sent him an explicit video" ("[D]o you want me to post your nudes? Do you want to ruin your chances of ever going to a good college? Do you want to ruin your chances of getting a good

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[4] Letter from Senators Richard Blumenthal and Marsha Blackburn to Mark Zuckerberg (June 21, 2023), https://perma.cc/EK7A-6WHY.

[5] Jeff Horwitz & Katherine Blunt, *Instagram Connects Vast Pedophile Network*, Wall Street Journal (June 7, 2023), https://perma.cc/H5XN-XBUY.

[6] *Id.*

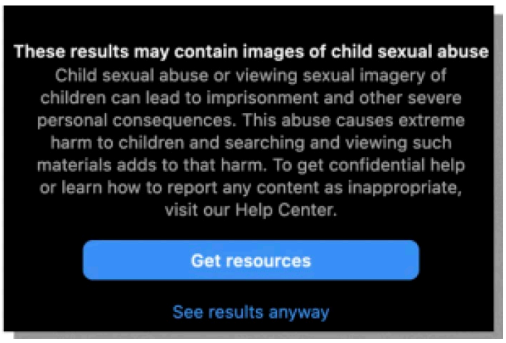
[7] *Man Sentenced to 70 Months in Nationwide Sextortion Case*, U.S. Dep't of Justice (Aug. 29, 2023), https://perma.cc/5N87-UW6Z.

[8] *Id.*

[9] *Id.*

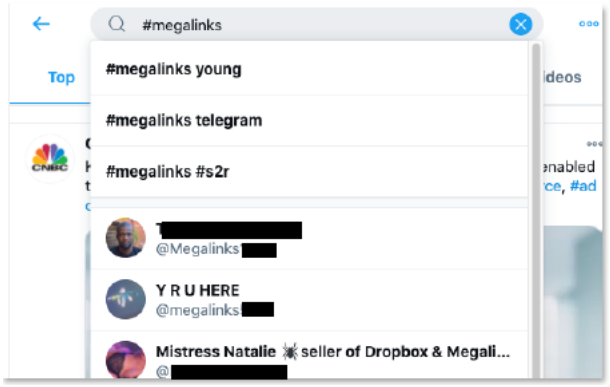
job?").[10] Then he would "threaten[] to release the video unless the girl engaged in a live video call in which [she] followed [Le's] sexual commands."[11]

Snapchat and other platforms are hotbeds of child sex abuse not only because they give predators like Le access to children but also because they employ design features that support predators. Messages on Snapchat, for instance, are "self-deleting," which allows predators to conceal their crimes. *Snap, Inc.*, 144 S. Ct. at 2493 (Thomas, J., dissenting from denial of certiorari, joined by Gorsuch, J.). Instagram's recommendation algorithms connect predators to each other, recommending to them accounts that use terms associated with child sexual abuse.[12] Instagram has even allowed users to view content that its algorithms identified as child sexual abuse material. Until recently, it had a "See results anyway" option for posts that appeared to "contain images of child sexual abuse":[13]



[10] *Id.*
[11] *Id.*
[12] Horwitz & Blunt, *supra* n.5.
[13] *Id.*

On X, when a predator searches for child sexual abuse material, the search bar suggests terms and hashtags to help facilitate the search:[14]



TikTok lets predators pose as children when they create an account.[15] And on both TikTok and Instagram, users can keep operating accounts even after evidence of child sexual abuse is discovered on one of their accounts.[16]

Social-media companies know their platforms are dangerous for children, but rather than protect kids, they have tried to conceal the risks the platforms pose. Companies like Meta and TikTok have refused "access to [their] data" and "bur[ied] evidence" of the harm

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[14] App.175a–78a. "#Megalinks" is a hashtag associated with child sexual abuse material. *Id.*

[15] Tawnell D. Hobbs, "*Every Parent's Nightmare": TikTok is a Venue for Child Sexual Exploitation*, Wall Street Journal (Feb. 15, 2023), https://perma.cc/EAY9-DUTU.

[16] *See id.*; Horwitz & Blunt, *supra* n.5.

they are inflicting on children.[17] "Meta's counsel" has even advised "researchers" at Meta "to block or redesign research about" the danger that Meta platforms pose to adolescents.[18]

Because social-media companies have been unwilling to fix their platforms' design defects, child exploitation is at a "breaking point."[19] Over the past 20 years—as social-media use has skyrocketed—online exploitation and abuse of children has increased 422%.[20] One out of every six kids is now a victim of online sexual abuse,[21] and law enforcement agencies across the country are "besieged" by reports of child sexual abuse material.[22] "With so many

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[17] *Social Media and Youth Mental Health: The U.S. Surgeon General's Advisory*, Off. of the Surgeon Gen. 11 (2023), https://tinyurl.com/33u2t7kn (first quote); *Hidden Harms: Examining Whistleblower Allegations that Meta Buried Child Safety Research: Hearing Before the Subcomm. on Priv., Tech., and the L. of the S. Comm. on the Judiciary*, 119th Cong. 1 (2025) (written statement of Jason Sattizahn), https://tinyurl.com/37jmj2a8 (second quote); *see also* Shannon Bond & Bobby Allyn, *Whistleblower Tells Congress that Facebook Products Harm Kids and Democracy*, NPR (Oct. 5, 2021), https://tinyurl.com/yc4zex93 (Meta whistleblower exposing that "Facebook executives hide research about the social network's risks to keep its business humming").

[18] *Dist. of Columbia v. Meta Platforms, Inc.*, No. 2023-CAB-006550, slip op. at 10 (D.C. Super. Ct. Oct. 23, 2025).

[19] Keller & Dance, *supra* n.2.

[20] U.S. Sent'g Comm'n, Federal Sentencing of Child Pornography: Production Offenses 3 (2021), https://perma.cc/A2BT-P99X.

[21] Finkelhor, et al., *supra* n.1.

[22] Keller & Dance, *supra* n.2.

reports of the abuse coming their way," some agencies are forced to "focus[] on imagery depicting the youngest victims."[23]

II. LOWER COURTS HAVE MISCONSTRUED SECTION 230 AND STIFLED EFFORTS TO PROTECT KIDS FROM SEXUAL PREDATORS.

Section 230 has a "narrow focus": It shields platforms from publisher liability. *Snap*, 144 S. Ct. at 2493 (Thomas, J., dissenting from denial of certiorari, joined by Gorsuch, J.). Under the statute, platforms cannot be "treated as the publisher or speaker of any information provided" by a user. 47 U.S.C. § 230(c)(1). That means platforms cannot be held "strictly liable for transmitting" defamatory content. *Malwarebytes, Inc. v. Enigma Software Grp. USA*, 141 S. Ct. 13, 14 (2020) (Thomas, J., statement respecting denial of certiorari). But platforms are still subject to liability for reckless or negligent conduct. *See id.* If they know "content [i]s illegal" and they distribute it anyway, they can be held liable for their actions. *Id.* So too if they negligently design their products. *See Force*, 934 F.3d at 77 (Katzmann, C.J., concurring in part and dissenting in part).

Lower courts, however, have read Section 230 "expansive[ly]." Agnieszka McPeak, *Platform Immunity Redefined*, 62 Wm. & Mary L. Rev. 1557, 1574 (2021). "[R]el[ying] on policy and purpose arguments," they have "granted sweeping protection to internet platforms." *Malwarebytes*, 141 S. Ct. at 15 (Thomas, J., statement respecting denial of certiorari). In the name of "Congress's objectives,"

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[23] *Id.*

lower courts "favor . . . immunity," *Force*, 934 F.3d at 64, and construe Section 230 as a shield against "liability stemming from any activity in which . . . publishing companies commonly engage." *Id.* at 81 (Katzmann, C.J., concurring in part and dissenting in part). Under that view of Section 230, platforms cannot be held liable for any "decisions" related to what "third-party content" they distribute or how they distribute it. *Id.* at 67 (majority op.).

That construction of Section 230 has resulted in widespread derogation of state laws. *See* Gregory M. Dickinson, *The Internet Immunity Escape Hatch*, 47 BYU L. Rev. 1435, 1471 (2022). Internet companies have used Section 230 to thwart state-law claims for breach of contract, *Goddard v. Google, Inc.*, No. C 08-2738, 2008 WL 5245490, at *5 (N.D. Cal. Dec. 17, 2008); unlawful and unfair competition, *Kimzey v. Yelp Inc.*, 21 F. Supp. 3d 1120, 1121–23 (W.D. Wash. 2014); cyberstalking and securities violations, *Universal Commc'n Sys., Inc. v. Lycos, Inc.*, 478 F.3d 413, 422 (1st Cir. 2007); tortious interference with a business expectancy, *Nemet Chevrolet, Ltd. v. Consumeraffairs.com, Inc.*, 591 F.3d 250, 252–53 (4th Cir. 2009); negligence, *Daniel v. Armslist, LLC*, 926 N.W.2d 710, 726 (Wis. 2019); and products liability, negligent design, and failure to warn, *Herrick v. Grindr, LLC*, 306 F. Supp. 3d 579, 588–92 (S.D.N.Y. 2018).

Worse, social-media companies wield this Section 230 shield while swinging the sword of free speech—arguing their content "curation" constitutes expressive activity that invalidates states' regulations. *See, e.g., Moody v. NetChoice, LLC*, 603

U.S. 707, 721 (2024). And where state tort liability ordinarily checks First Amendment freedom, Section 230's excessive immunity eviscerates any balance. *See Doe v. McKesson,* 71 F.4th 278, 291–92 (5th Cir. 2023) ("[T]he First Amendment does not prohibit States from imposing tort liability even if the tort occurs in the context of expressive activity." (citing *NAACP v. Claiborne Hardware Co.,* 458 U.S. 886, 927 (1982)); *Pennekamp v. Florida,* 328 U.S. 331, 356 (1946) (Frankfurter, J., concurring) (First Amendment freedom is "not a freedom from responsibility for its exercise.").

Yet despite courts' "broad construction of § 230," Internet providers have "no plausible claim to a constitutional *entitlement* to full immunity for publishing or distributing constitutionally unprotected [tortious] content." *Children's Health Def. v. Meta Platforms, Inc.,* 112 F.4th 742, 779–80 (9th Cir. 2024) (Collins, J., concurring in part). But by calling upon both the protections of Section 230 and the First Amendment, social-media companies effectively demand full immunity.

And as relevant here, Social-media companies have exploited this sweeping reading of Section 230 to escape liability for their role in the child-sexual-abuse epidemic. *See Snap*, 144 S. Ct. at 2493 (Thomas, J., dissenting from denial of certiorari, joined by Gorsuch, J.). Unlike brick-and-mortar businesses that must answer for defective products, platforms have avoided responsibility for the harm they have caused by wielding Section 230 as an "all purpose get-out-of-jail-free card." *Internet Brands, Inc.*, 824 F.3d at 853. Courts have repeatedly held that Section 230 shields

platforms from liability for their product designs because the designs relate "to [platforms'] role as a publisher." *Doe v. MySpace, Inc.*, 528 F.3d 413, 416, 420 (5th Cir. 2008); *id.* at 416 (Section 230 immunizes platforms that fail to "implement basic safety measures to prevent sexual predators from communicating with minors"); *Doe v. Backpage.com, LLC*, 724 F. Supp. 3d 882, 885 (N.D. Cal. 2024) (same for platforms that facilitate "sex trafficking by creating, suggesting, and encouraging connections between sex traffickers and vulnerable persons"); *L.W. through Doe v. Snap Inc.*, 675 F. Supp. 3d 1087, 1097 (S.D. Cal. 2023) (same for platforms that use "design features" that conceal child sexual abuse); *see also* Mary G. Leary, *The Indecency and Injustice of Section 230 of the Communications Decency Act*, 41 Harv. J. L. & Pub. Pol'y 553, 578–82 (2018) (surveying similar decisions).

Those decisions have had devastating consequences. Tort and unfair-trade-practices laws have historically protected the public from dangerous products, including cigarettes, opioids, and automobiles. They have provided victims a remedy and incentivized companies to reform their products by forcing them to internalize costs that their products impose on the public. *See, e.g.*, *Affiliated FM Ins. Co. v. LTK Consulting Servs., Inc.*, 243 P.3d 521, 528 (Wash. 2010) ("Tort liability . . . force[s] negligent [businesses] to internalize the costs of their unreasonable conduct, making them more likely to take due care."). But many courts' approach to Section 230 has neutered tort and unfair-trade-practices laws on the internet, leaving social-media companies little reason to clean up their platforms. "Free from

potential liability, platforms have a financial interest in minimizing spending on . . . measures to" combat child sexual abuse.[24]

None of this can be squared with this Court's precedent. This Court has repeatedly said that federal preemption of state efforts to protect health and safety "should not be lightly inferred." *Hawaiian Airlines, Inc. v. Norris,* 512 U.S. 246, 252 (1994) (quotation omitted). To displace state laws protecting citizens from dangerous products, Congress must "make its intention to do so unmistakably clear in the language of the [preemption] statute." *Ashcroft*, 501 U.S. at 460 (quotation omitted). Section 230 includes no such language. It does not use "exceedingly clear language" immunizing platforms from all tort and unfair-trade-practices claims related to their design features. *United States Forest Serv. v. Cowpasture River Pres. Ass'n*, 590 U.S. 604, 622 (2020).

III. SECTION 230 DOES NOT BAR PETITIONERS' SEX-TRAFFICKING CLAIMS.

The Ninth Circuit's decision here is more of the same: The court read Section 230 as bestowing sweeping immunity on platforms and wrongly held that X is immune from Petitioners' sex-trafficking claims. The claims do not treat X as a publisher, and even if they did, Section 230's sex-trafficking carveout applies.

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[24] Neil Fried, *The Myth of Internet Exceptionalism*, American Affairs (Summer 2021), https://perma.cc/Q94Y-EH3S.

A. The Ninth Circuit erred out of the gate by concluding that Petitioners' "theory for liability" treats X as a publisher. *Doe 1*, 148 F.4th at 643. As explained above, a claim treats a platform as a publisher if it seeks to hold the platform "strictly liable for transmitting" third-party information. *Malwarebytes*, 141 S. Ct. at 14 (2020) (Thomas, J., statement respecting denial of certiorari). But Petitioners' claims neither seek to hold X strictly liable nor punish it for any information posted by third parties. Petitioners allege that X *knowingly* maintained and distributed child sexual abuse material, *see* App.160a–61a, which is "illegal contraband," not information. *Kimbrough*, 69 F.3d at 731.

Those allegations have nothing to do with "publishing." Sexual predators abused Petitioners, created child sexual abuse material, and trafficked that contraband on X. X then knowingly possessed and disseminated the contraband. X cannot label the contraband "information" and drape Section 230 over itself just because child sexual abuse material is accessed via a computer screen. A platform that knowingly distributes child sexual abuse material is no more a "publisher or speaker" of "information" than a drug runner. 47 U.S.C. § 230(c)(1).

The Ninth Circuit incorrectly assumed that child sexual abuse material is "information" under Section 230(c)(1). That provision says: "No [platform] shall be treated as the publisher or speaker of any information provided by" a user. In 1996, when Congress passed Section 230, no one would have understood "information" in that sentence to include child sexual

abuse material. "Information" referred to "something told; knowledge" or "items of knowledge; news." *Information*, Oxford Modern English Dictionary 546 (1992); *see also Information*, Merriam-Webster Collegiate Dictionary 599 (10th ed. 1993) ("the communication or reception of knowledge or intelligence"). Child sexual abuse material was nothing of the sort—it was (and still is) illegal contraband "involv[ing] the use of a minor engaging in sexually explicit conduct." 18 U.S.C. § 2252(a) (1996). Section 230 was never intended to protect such material: Since 1996, the statute has specified that it should not "be construed to impair" efforts to rid the internet of material "relating to sexual exploitation of children." 47 U.S.C. § 230(e)(1); *see also id.* § 230(b)(5) (stating that Congress intends "vigorous enforcement of Federal criminal laws").

B. Even if the Ninth Circuit were right that Petitioners' sex-trafficking claims treat X as a publisher, the claims are not barred because Section 230's sex-trafficking carveout applies. *See* 47 U.S.C. § 230(e)(5)(A) ("Nothing in this section . . . shall be construed to impair or limit . . . any" federal civil sex-trafficking claim.). The Ninth Circuit held that Petitioners' allegations do not trigger the carveout because they do not establish that X "actively participated" in sex trafficking. *Twitter*, 148 F.4th at 644. Even assuming that active participation is required, *but see* Pet. Br. 20–34, Plaintiffs' allegations are sufficient. A platform actively participates in sex trafficking if it "knowingly assist[s], support[s], or facilitat[es]" a sex-trafficking "venture." 18 U.S.C. § 1591(a), (e)(4). And taking Petitioners' allegations

"as true," X did exactly that. *Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 556 (2007).

Petitioners alleged that sexual predators coerced them into commercial sex acts (creating child sexual abuse material), App.179a–80a; the predators advertised the material on X, App.182a–84a; Petitioners notified X multiple times that the predators had posted the material on its platform, App.183a–89a; X knew that its algorithms and search-suggestion feature would push out the material to users, App.171a–79a; X nevertheless refused to take down the material (or even stop its algorithms and search-suggestion feature from promoting the material), App.187a–89a; and X then pushed out the material to thousands of users. *See* App.191a–92a.

That is not "merely turn[ing] a blind eye" to sex trafficking. *Twitter*, 148 F.4th at 644. Instead, X "help[ed] make [the predators' venture] succeed." *Taamneh*, 598 U.S. at 497. By knowingly hosting and pushing out the child sexual abuse material, X put its online-distribution machine to work for the venture. Its actions facilitated the spread of child sexual abuse material to thousands of potential buyers.

X, then, is just as culpable as a shipping company that knowingly transports drugs for a cartel. If a cartel gives a shipping company a package stuffed with fentanyl, the company knows about the fentanyl, and it nevertheless transports the package, then the company would be guilty of participating in drug distribution. *See United States v. Cano-Guel*, 167 F.3d 900, 904–05 (5th Cir. 1999) (affirming conviction for "possession of marijuana with intent to distribute"

because the evidence established that the defendant "knew" he was transporting marijuana); *United States v. Parker*, 587 F.3d 871, 881 (8th Cir. 2009) (similar). X's actions here are no different. It assisted a criminal venture by knowingly distributing the venture's contraband.

CONCLUSION

This Court should grant certiorari and reverse the Ninth Circuit's judgment.

Respectfully submitted,

JAMES UTHMEIER
Attorney General

RYAN D. NEWMAN
Chief Deputy Attorney General

DAVID M.S. DEWHIRST
Solicitor General
Counsel of Record
JASON J. MUEHLHOFF
Chief Deputy Solicitor General
THOMAS F. KELLY
Fellow

OFFICE OF THE FLORIDA ATTORNEY GENERAL
PL-01, The Capitol
Tallahassee, Florida 32399
(850) 414-3300
Jason.Muehlhoff@myfloridalegal.com

March 12, 2026

ADDITIONAL SIGNATORIES

BRENNA BIRD
ATTORNEY GENERAL
STATE OF IOWA

RUSSELL COLEMAN
ATTORNEY GENERAL
STATE OF KENTUCKY

JONATHAN SKRMETTI
ATTORNEY GENERAL
STATE OF TENNESSEE

MICHAEL T. HILGERS
ATTORNEY GENERAL
STATE OF NEBRASKA

LYNN FITCH
ATTORNEY GENERAL
STATE OF MISSISSIPPI

RAÚL LABRADOR
ATTORNEY GENERAL
STATE OF IDAHO

JOHN MCCUSKEY
ATTORNEY GENERAL
STATE OF WEST VIRGINIA

KEN PAXTON
ATTORNEY GENERAL
STATE OF TEXAS

TIM GRIFFIN
ATTORNEY GENERAL
STATE OF ARKANSAS

CHRISTOPHER CARR
ATTORNEY GENERAL
STATE OF GEORGIA

STEVE MARSHALL
ATTORNEY GENERAL
STATE OF ALABAMA

TODD ROKITA
ATTORNEY GENERAL
STATE OF INDIANA

STEPHEN J. COX
ATTORNEY GENERAL
STATE OF ALASKA

DEREK BROWN
ATTORNEY GENERAL
STATE OF UTAH

DREW WRIGLEY
ATTORNEY GENERAL
STATE OF NORTH DAKOTA

ALAN WILSON
ATTORNEY GENERAL
STATE OF SOUTH CAROLINA