No. 25A1240

In The Supreme Court of the United States

DON SCOTT, IN HIS OFFICIAL CAPACITY AS SPEAKER OF THE VIRGINIA HOUSE OF DELEGATES, ET AL.,

Applicants,

v.

RYAN T. MCDOUGLE, VIRGINIA STATE SENATOR AND LEGISLATIVE COMMISSIONER FOR THE VIRGINIA REDISTRICTING COMMISSION, ET AL.,

Respondents.

On Application for a Stay

BRIEF OF *AMICUS CURIAE* THE AMERICAN CENTER FOR LAW AND JUSTICE IN OPPOSITION TO A STAY

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INTEREST OF AMICUS CURIAE

Amicus curiae American Center for Law & Justice ("ACLJ") is an organization dedicated to the defense of constitutional liberties secured by law.[1] ACLJ attorneys have appeared often before this Court as counsel for parties, *e.g. Trump v. Anderson*, 601 U.S. 100 (2024); *McConnell v. FEC*, 540 U.S. 93 (2003); or as *amicus*, *e.g. Bost v. Ill. State Bd. of Elections*, 607 U.S. 71 (2026); *Republican Nat'l Comm. v. Genser*, 145 S. Ct. 9 (2024); *Trump v. United States*, 603 U.S. 593 (2024); and *Bush v. Gore*, 531 U.S. 98 (2000). The ACLJ has a fundamental interest in defending the constitutional structure protecting elections and in promoting election security and confidence.

SUMMARY OF ARGUMENT

Applicants ask this Court to stay a decision by the Supreme Court of Virginia interpreting Article XII, § 1 of the Virginia Constitution—a provision that has governed constitutional amendments in the Commonwealth for over 150 years. That is a question of Virginia constitutional law. A state court may consult federal decisions for guidance, use them as persuasive authority, or discuss them to explain why they do not compel a different result, all without converting a state-law judgment into a federal question. The Virginia Supreme Court explicitly grounded its holding in the text, history, and structure of the Virginia Constitution. That those grounds happen to harmonize with—rather than conflict with—propositions articulated in

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[1] Pursuant to Supreme Court Rule 37.6, *amicus curiae* states that no counsel for any party authored this brief in whole or in part, and no entity or person, aside from amicus curiae, its members, and its counsel, made any monetary contribution toward the preparation or submission of this brief.

some federal cases does not suddenly render them insufficient to support the judgment.

The Virginia Supreme Court carried out its constitutional duty to say what the law is and to defend constitutional requirements:

> [I]f the whole legislature, an event to be deprecated, should attempt to overleap the bounds, prescribed to them by the people, I, in administering the public justice of the country, will meet the united powers, at my seat in this tribunal; and, pointing to the constitution, will say, to them, here is the limit of your authority; and, hither, shall you go, but no further.

Scott v. McDougle, Record No. 260127, 6-7 (Va. May 8, 2026) (*quoting Commonwealth v. Caton*, 8 Va. (4 Call) 5, 8 (1782) (opinion of Wythe, J)).

Moreover, there are other strong state constitutional arguments that would provide alternative, independent, state-law grounds for the decision below. Amicus flags those arguments, not for this Court to resolve (being matters of state law), but rather to show that the equities weigh heavily against staying the decision below. If there are multiple independent state law arguments for the result below, this would make intervention by this Court all the more unwise.

Here, briefly, are the alternative state arguments in support of the judgment below: First, the amendment was submitted to the voters less than two months after HJR 6007's final passage on January 16, 2026—well short of the ninety days that Article XII, § 1 mandates before submission. The Virginia Supreme Court has squarely held that "a standard of strict compliance with *all* specified prerequisites, rather than a standard of substantial compliance, must be applied." *Coleman v. Pross*,

219 Va. 143, 158 (1978) (emphasis added). The compressed timeline adopted by the General Assembly does not come close to meeting that standard.

Second, the submission itself was fundamentally defective. The ballot's "restore fairness" framing misrepresents what the amendment does and is inconsistent with the actual text of the amendment. Under the Virginia Supreme Court's settled precedent, the remedy for such a violation was not severance but invalidation of "the entire act[.]" *Whitlock v. Hawkins*, 105 Va. 242, 247 (1906).

The amendment was improper on several independent state grounds. The court below embraced one of them without reaching the others. This Court should not stay the decision below, as that interference with state constitutional processes would be an exercise in futility as well as a breach of federalism.

ARGUMENT

I. Applicants do not identify any Federal Question appropriate for this Court's review.

This Court's jurisdiction over state court decisions is confined to questions of *federal* law. 28 U.S.C. § 1257(a). It is a basic "principle that we will not review judgments of state courts that rest on adequate and independent state grounds . . . ." *Michigan v. Long*, 463 U.S. 1032, 1041 (1983). That limitation is not a technicality—it reflects the foundational principle that state courts are as "the final arbiters of state law in our federal system." *United States v. Taylor*, 596 U.S. 845, 859 (2022). This Court does not sit as a general court of errors to correct state courts' alleged mistakes in interpreting their own constitutions.

The decision of the Supreme Court of Virginia here is, from top to bottom, an interpretation of the Virginia Constitution, focused above all on Article XII, § 1. The court's ruling depends entirely on the meaning of a *state* constitutional provision. This Court has no warrant to disturb it.

"Respect for the independence of state courts, as well as avoidance of rendering advisory opinions, have been the cornerstones of this Court's refusal to decide cases where there is an adequate and independent state ground." *Long*, 463 U.S. at 1040. Applicants evince creativity by arguing that the Virginia Supreme Court's decision was "interwoven" with federal law because it cites to some federal cases. But state courts cite federal precedents every day while resolving purely state-law issues. Mere occasional citation of federal decisions interpreting federal law does not transform state constitutional interpretation into something else.[2] If that were so, state courts would be free to invoke the reasoning from forty-nine other states, but any reference to the reasoning of federal courts would bring with it an opening for overzealous advocates to cry "federal error!" Federalism does not require state courts to be severely allergic to federal court cases. Under this Court's well-established doctrine, where the state-law ground is independent and adequate to support the judgment, this Court lacks jurisdiction to review it, full stop.

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[2] Applicants' argument in this case is especially rich. The state supreme court cited to a *dissent* in one of this Court's decisions, *see McDougle*, Record No. 260127 at 1-2. Since a dissent is not federal law, this citation perfectly illustrates how a state court can invoke *reasoning* from federal jurists without lashing itself to a federal *holding*.

The Virginia Supreme Court's majority opinion was structured as follows. It began with the constitutional text, specifically the phrase "general election" in Article XII, § 1. It then examined the historical meaning of that phrase across successive Virginia constitutions. It consulted Virginia statutes—including the statute enacted by the very first General Assembly sitting under the 1971 Constitution—defining "general election." It invoked the Governor's proclamation ratifying that Constitution. These are all state-law sources. After establishing this state-law foundation, the court then cited some federal law—not to derive its definition of "election" from federal sources, but to explain that its state-law interpretation did not conflict with federal requirements. *McDougle, et al.*, Record No. 260127, at 27-28.

That is a paradigmatically permissible use of federal authority. A Virginia court interpreting a Virginia contract may cite federal decisions. A Virginia court interpreting a Virginia civil rights statute may look to Title VII precedents by analogy. A Virginia court interpreting constitutional language that mirrors federal constitutional text may consult federal decisions as persuasive authority. None of these citations converts the state-law judgment into a federal question over which this Court has jurisdiction.

Applicants argue that the Virginia Supreme Court "based its 'definition' of 'election' on federal law." App. 25A1240 12. That characterization misreads the opinion. The Virginia Supreme Court cited *Foster v. Love* for the general proposition that an "election" involves "the combined actions of voters and officials meant to make

a final selection of an officeholder." *McDougle, et al.*, Record No. 260127, at 19 (citing 522 U.S. at 71). But that proposition is unremarkable—it is simply a description of what an election is. The court used it to frame its analysis, not to derive the critical holding that "general election" in Article XII encompasses the early voting period. That holding emerged from the court's analysis of *Virginia c*onstitutional text, *Virginia* history, and *Virginia* statutes.

The situation here is precisely the opposite of the scenario that *Michigan v. Long* addressed. That case arose when a state court appeared to have *applied federal constitutional standards* more broadly than this Court's precedents required, and it was unclear whether the state court would have reached the same result under state law alone. 463 U.S. at 1037-38. The concern was that a state court had misread federal law as requiring a particular result, and this Court needed to clarify what federal law required. *Id.* at 1040-41. Here, by contrast, the Virginia Supreme Court's interpretation of the state constitution rests on state constitutional interpretation, not federal law. There is no need for this Court to review a misreading of federal law, because federal law was not what the lower court relied upon.

Article XII, § 1 of the Virginia Constitution is unique to Virginia. The Virginia Supreme Court's interpretation of it binds no other court in any other jurisdiction. The Virginia Supreme Court did not purport to interpret federal law in a binding or precedential way. It referenced federal authorities as part of its own interpretive

analysis of *Virginia* law.[3] This Court does not supervise state courts' interpretations of their own constitutions. But that is all the state supreme court did.

The Virginia Supreme Court decided a question of state constitutional law. That court's discussion of federal authorities in the course of reaching a state-law result does not confer jurisdiction on this Court. The independent-and-adequate-state-ground doctrine bars review, and the stay standard is not satisfied.

II. Even Setting Aside the Jurisdictional Bar, the Multiple Independent State-Law Grounds Mitigate Heavily Against Intervention by this Court.

The decision to grant or deny a stay entails, *inter alia*, considering the equities as well as the likelihood of success. *Noem v. Perdomo*, 146 S. Ct. 1, 2 (2025). Here, multiple, independent state law grounds exist – or at least are supported by strong arguments on which the state supreme court would have the last word – to support the judgment below. Hence, a stay by this Court would be very likely both futile and inequitable. Even setting aside the jurisdictional bar entirely, applicants cannot demonstrate the fair prospect of reversal that a stay requires. The Virginia Supreme Court's judgment can rest on at least three independent and adequate state-law grounds—the absence of an intervening election (the basis for the judgment below), the violation of the ninety-day submission requirement (an argument which the state supreme court did not yet need to reach), and the ballot's misleading description

[3] Even if this Court were to disagree with how the Virginia Supreme Court portrayed *Foster v. Love*, that disagreement would not affect *any* future application of the federal Election Day statute.

(likewise an argument which the court below did not yet reach)—each of which can independently suffice void the amendment and each of which, as a state law argument, is separately insulated from this Court's review. The sections that follow address those grounds not to invite this Court to resolve these state-law questions, which would be inappropriate, but to make plain that no realistic path to reversal exists. Where every available route is blocked by an independent and adequate state ground, the stay standard cannot be met.

A. The Virginia Supreme Court's decision should not be stayed because there was no intervening general election between HJR 6007 and HB 1384.

The Constitution of Virginia is clear on the requirements that must be met for a Constitutional Amendment via referendum to be passed. An amendment originating in one of the two legislative chambers must "be agreed to by a majority of the members elected to each of the two houses, such proposed amendment or amendments shall be . . . referred to the General Assembly at its first regular session held *after* the next general election of members of the House of Delegates." Va. Const. art. XII, § 1 (emphasis added).

This means simply that an amendment need be proposed by either chamber, find majority approval in both, then be ratified by a new General Assembly after an intervening election of the members of the House of Delegates. This requirement was not met by HJR 6007 and HB 1384, the two bills that resulted in the redistricting measure in this case.

The Virginia Supreme Court correctly confirmed this conclusion. In its opinion, the court held that because early voting for the 2025 general election had already begun on September 19, 2025—more than a month before the General Assembly's first passage of HJR 6007 on October 31, 2025, there was no intervening general election as required by Article XII, § 1. The court explained:

> In this case, voting in the general election for the House of Delegates began on September 19, 2025, and ended on Election Day, November 4, 2025. The General Assembly voted for the first time to propose the constitutional amendment to the electorate on October 31, 2025. By that date, over 1.3 million votes had been cast in the general election, which was approximately 40% of the total vote for that election cycle.

McDougle, et al., Record No. 260127 at 12. It would be ludicrous to propose that an election does not begin until the actual date of Election Day, when early voting has rendered the whole process 40% complete. Indeed, under that rationale, the legislature could have voted to propose the constitutional amendment on the very same Election Day, so long as it did so before all the votes were cast.

Rejecting the Commonwealth's narrow view that "election" means only Election Day, the Virginia Supreme Court sensibly held that the term "election" encompasses the full voting process, not just votes cast on a particular day. The court emphasized that "'the Constitution was written to be understood by the voters,'" *McDougle, et al.*, Record No. 260127 at 15 (quoting *Old Dominion Comm. For Fair Util. Rates v. State Corp. Comm'n*, 294 Va. 168, 185 (2017)), and that the Commonwealth's position would render the intervening-election safeguard meaningless for the 1.3 million-plus early voters. This constitutional violation, the

court concluded, "incurably taints the resulting referendum vote and nullifies its legal efficacy." *McDougle,* Record No. 260127 at 1. The Virginia Supreme Court's thorough analysis of the text, history, and purpose of Article XII, § 1 fully supports its conclusion.

The Commonwealth's interpretation of the Virginia Constitution attempts to collapse "the general election" into a single calendar date while disregarding the reality of how elections are conducted. No one contends that early voting replaces Election Day. The question is whether the Constitution's reference to "the general election" encompasses the full, lawful voting process associated with that election. Under Virginia law, voting in the general election begins well before Election Day, and ballots cast during that period are no less part of the election itself.

Recognizing that fact does not elevate statute over the Constitution—it reflects the ordinary way constitutional provisions are implemented. The Virginia Supreme Court did not "redefine" a constitutional event; it acknowledged that the election, as the Constitution uses that term, includes all valid votes cast in that election. The proper analysis is to demarcate early voting as the start of the election and Election Day as the consummation of the process.

This is consistent with how elections have been described at the federal level. *See Foster*, 522 U.S. at 71 (holding that the word "election" in federal statues "plainly refer[s] to the combined actions of voters and officials meant to make a final selection of an officeholder" rather than simply Election Day); *Voting Integrity Project, Inc. v.*

Keisling, 259 F.3d 1169, 1176 (9th Cir. 2001) (holding that "[a]lthough voting takes place, perhaps most voting, prior to election day, the election is not 'consummated' before election day because voting still takes place on that day"); *see Voting Integrity Project, Inc. v. Bomer*, 199 F.3d 773, 775-76 (5th Cir. 2000) (relying on *Foster* to justify early voting because the term "election" is not limited to a single day).

The Virginia Supreme Court properly held that it is the most natural and most rational interpretation to consider the 2025 election as having begun at the time of early voting and concluded on Election Day. *McDougle, et al.*, Record No. 260127; *see McDougle v. Nardo*, 116 Va. Cir. 299, 302-303 (2026). Therefore, the constitutionally required intervening election cannot be said to have occurred between the passage of HJR 6007 and HB 1384, because the election had already begun before HJR 6007 was passed, and the Virginia Supreme Court accordingly held that

> the definition of 'general election' in Article XII, Section 1 describes the combined actions of voters casting ballots and officers of election receiving those votes and closing the polls on the last day of the election. The plain and ordinary meaning of the expression matches the historical definition embraced by the courts and legal scholars.

McDougle, et al., Record No. 260127 at 22.

B. The amendment is also subject to invalidation because it did not meet the ninety-day submission requirement.

The Virginia Supreme Court has made clear that when the Constitution or governing law prescribes procedural requirements, strict compliance is required. In *Coleman*, 219 Va. at 155, the court emphasized that constitutional procedures must be followed with precision, rejecting any "flexible" or approximate standard. There, a

deviation in the amendment process was fatal because the Constitution demands adherence to "the same" proposal across sessions. *Id.* at 159. The court underscored that these procedural safeguards exist to ensure deliberation, transparency, and legitimacy, and cannot be relaxed for convenience. *See generally id.* at 150-59.

The court was clear that "in determining whether proposed amendments to the Constitution may properly be referred to the electorate, a standard of strict compliance with *all* specified prerequisites, rather than a standard of substantial compliance, must be applied." *Id.* at 158 (emphasis added).

Although *Coleman* arose from a different procedural defect—the failure to submit the identical proposal across both legislative sessions—its holding was not so limited. The court's reasoning rested on the broader principle that Article XII's requirements exist to protect deliberation, transparency, and legitimacy in the amendment process. *Id.* at 154, 158. The court expressly held that strict compliance is required with "*all* specified prerequisites," not merely the identity requirement at issue in that case. *Id.* at 158 (emphasis added).

Each of the requirements examined in this brief—the intervening election, the ninety-day submission window, the prohibition on local or special laws, and the accurate-submission obligation—is a "specified prerequisite[]" within the meaning of *Coleman*. *Id.* None is exempt from the strict compliance standard.

Although the Virginia Supreme Court found the intervening-election defect dispositive and did not need to reach the ninety-day issue, the lower court's analysis

on strict compliance with Article XII, § 1 remains sound and consistent with *Coleman v. Pross*.

For an amendment to the Virginia Constitution to be passed to the voters, the Virginia Constitution mandates that "it shall be the duty of the General Assembly to submit such proposed amendment or amendments to the voters qualified to vote in elections by the people, in such manner as it shall prescribe and *not sooner than ninety days after final passage* by the General Assembly." Va. Const. art. XII § 1 (emphasis added). The ninety-day requirement is mandatory and should be strictly construed under *Coleman*. Yet the timeline under which this mandate was enacted here fails to satisfy the strict procedural requirements that govern election-related lawmaking in Virginia. The amendment violates those requirements.

The amendment "finally passed" on January 16, 2026, as HB 1384. *See History, HJ 4*, Gen. Assemb., Reg. Sess. (Va. 2026), https://lis.virginia.gov/bill-details/20261/HJ4. But early voting began on March 6, 2026. Press Release, Va. Dep't of Elections, Early Voting for April 21 Referendum Begins March 6 (Mar. 6, 2026), https://www.elections.virginia.gov/news-releases/early-voting-for-april-21-referendum-begins-march-6-1.html. The amendment was submitted to the people for voting less than two months after the bill's final passage; a plain violation of Article XII. However, the Virginia Constitution clearly requires the legislature to "submit such proposed amendment or amendments to the voters qualified to vote . . . not sooner than ninety days after final passage by the General Assembly." Va. Const. art.

XII § 1. In this case, many voters had already voted before the ninety days had passed[4] and were no longer qualified to vote *again*. The very purpose of the provision of the Virginia Constitution to ensure that all voters, including early voters, have a full ninety days to make an informed decision. For hundreds of thousands of voters in this election, those constitutional protections were violated.

Further, the ninety-day mandate appears in Article XII, § 1 of the Virginia Constitution itself—not in the Code. A legislative enactment that purports to waive or shorten a constitutionally prescribed timeline does not amend the Constitution; it violates it. The General Assembly cannot grant itself, by ordinary legislation, a flexibility that the Constitution does not permit.

The General Assembly imposed a compressed and impracticable timeline that effectively prevents localities from complying with existing statutory election procedures. Rather than facilitating orderly administration, the statute forces local officials into an untenable position—either disregard established procedural safeguards or fail to meet the new mandate. This is precisely the type of procedural breakdown the doctrine of strict compliance is designed to prevent. As the Virginia Supreme Court cautioned in *Coleman*, procedural shortcuts risk undermining the integrity of the democratic process itself. HB 1384 imposes a timeline incompatible

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[4] By the time the ninety-day requirement was met, early voting had only two days left. With over 1 million voters casting their votes early, it stands to reason that most of those votes occurred before the final two days of early voting. *See Unofficial Results*, VA. DEPT. OF ELECTIONS (last updated April 25, 2026), https://enr.elections.virginia.gov/results/public/virginia/elections/2026-April-21-Special.

with legally required election procedures explicitly stated in Art. XII § 1 of the Virginia Constitution and therefore is plainly invalid.

The appropriate disposition is not severance or cure—there is nothing to sever, and the constitutional calendar cannot be retroactively rewound. The amendment must be declared void from inception. Should the General Assembly wish to propose the same or a similar amendment in the future, it retains full authority to do so, provided it complies with the procedural requirements the Virginia Constitution imposes. What it may not do is have this Court grant a permission slip to excuse its disregard of the state constitution.

C. The language of the amendment is misleading

Article XII, § 1 makes it the "duty of the General Assembly to *submit such proposed amendment*" to "the voters qualified to vote in elections by the people[.]" Va. Const. art. XII, § 1 (emphasis added). Virginia voters are entitled to vote on proposed amendments free of "[d]efects and errors" in submission. *Coleman*, 219 Va. at 158. A ballot that presents a political slogan instead of a description of the amendment is precisely the kind of defect *Coleman* contemplates. It does not merely omit information; it substitutes biased opinion for information. A voter who reads "restore fairness" and votes yes on that basis has not approved the amendment that HJR 6007 proposes.

Other state courts construing identical "submit" language have reached the same conclusion. In *Armstrong v. Harris*, 773 So. 2d 7, 12 (Fla. 2000), the Florida

Supreme Court held that "[i]mplicit in this provision is the requirement that the proposed amendment be accurately represented on the ballot; otherwise, voter approval would be a nullity." Minnesota requires that ballot language "not be so unreasonable and misleading as to be a palpable evasion of the constitutional requirement to submit the law to a popular vote." *Breza v. Kiffmeyer*, 723 N.W.2d 633, 636 (Minn. 2006). And Utah demands that proposed amendments be "placed on the ballot in such words and in such form that the voters are not confused thereby," so that "no reasonably intelligent voter would be misled as to what he was voting for or against." *League of Women Voters v. Utah State Legislature*, 559 P.3d 11, 29 (Utah 2024) (cleaned up). The amendment possesses no such clarity, and, indeed, the amicus ACLJ received information from some of its supporters that they were confused by the language and had no understanding of the true purpose of the proposed amendment based on the description.

The actual amendment authorizes the General Assembly "to modify one or more congressional districts at any point following the adoption of a decennial reapportionment law, but prior to the next decennial census, in the event that any State . . . conducts a redistricting" for reasons other than completing the decennial cycle or complying with a court order. H.J. Res. 6007, 2024 Spec. Sess. I (Va. 2025). That text says nothing about fairness. It is a procedural authorization tied to the conduct of other States. Furthermore, the verb "restore" presupposes that Virginia's current districts are unfair. This premise is both legally indefensible—the current

map satisfies the statutory fairness criteria codified at Va. Code § 24.2-304.04(8)—and factually wrong—the resulting delegations have closely tracked the statewide popular vote.

The language also conceals the amendment's most consequential features. The amendment suspends the Virginia Redistricting Commission—a body the people of Virginia themselves created by referendum and enshrined in Article II, § 6-A. A voter reading only "restore fairness" has no way to know that a "yes" vote withdraws a constitutional safeguard (against political gerrymandering) the electorate resoundingly adopted just five years ago. When a proposed amendment "results in the loss or restriction of an independent fundamental state right," that consequence must be disclosed on the ballot. *Cf. Armstrong*, 773 So. 2d at 17–18 (internal citation omitted).

Equally misleading is "upcoming elections." A Virginia voter in spring 2026 would reasonably understand that phrase to refer specifically the November 2026 midterms—yet the amendment authorizes the General Assembly to draw and redraw districts governing the 2026, 2028, and 2030 elections alike. The ballot conceals both the scope and the duration of the power it transfers. In short, it asks the voters a different question than HJR 6007 actually poses—the precise vice the Submission Clause prohibits.

* * *

The Virginia Supreme Court's decision rests on independent and adequate state-law grounds, and furthermore is supported by several other independent state arguments, any one of which is fatal to the proposed amendment. No federal question of sufficient substance supports this Court's exercise of jurisdiction. The integrity of Virginia's constitutional order—and the votes of the more than one million Virginians whose ballots were cast before the amendment lawfully could have been submitted—counsel strongly against intervention.

CONCLUSION

This Court should deny the application for a stay.

Respectfully submitted,

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