No. 16-1198

IN THE

Supreme Court of the United States

PATRIOTIC VETERANS, INC., *Petitioner*,

v.

CURTIS HILL, ATTORNEY GENERAL OF INDIANA,
Respondent.

On Petition for a Writ of Certiorari
to the United States Court of Appeals
for the Seventh Circuit

Brief *Amici Curiae* of U.S. Justice Foundation, One Nation Under God Foundation, Family-PAC Federal, Illinois Family Institute, and Republican Majority Campaign in Support of Petition for Writ of Certiorari by Petitioner Patriotic Veterans, Inc.

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May 5, 2017

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INTEREST OF THE *AMICI CURIAE*[1]

United States Justice Foundation (USJF) is a nonprofit educational organization, exempt from federal income tax under IRC section 501(c)(3). USJF was established, *inter alia*, for purposes related to participation in the public policy process, which purposes include programs to conduct research and to inform and educate the public on the proper construction of state and federal constitutions, as well as statutes related to the rights of citizens, and questions related to human and civil rights secured by law. This *amicus* has filed many *amicus curiae* briefs in this and other courts.

One Nation Under God Foundation is a nonprofit organization, exempt from federal income tax under IRC section 501(c)(3). This foundation educates religious organizations and voters on the importance of public participation. One Nation Under God Foundation also regularly communicates with churches about issues of vital importance to their member Christians. The group planned to contact more than 4,000 Christian churches in Indiana by automated telephone calls to encourage participation in church voter registration projects but can no longer do so because of the Seventh Circuit's decision below.

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[1] It is hereby certified that counsel for the parties have consented to the filing of this brief; that counsel of record for all parties received notice of the intention to file this brief at least 10 days prior to the filing of it; that no counsel for a party authored this brief in whole or in part; and that no person other than these *amici curiae*, their members, or their counsel made a monetary contribution to its preparation or submission.

Family-PAC Federal is a federal political action committee, registered with the Federal Election Commission. This organization endorses political candidates and causes throughout the United States. Consistent with its goals and purpose, Family-PAC Federal wants to make automated phone calls to voters in Indiana to endorse candidates but now cannot do so because of the extreme financial burden created by the use of live operators for such calls mandated by Ind. Code § 24-5-14-5. Additionally, the Federal Election Commission's maximum contribution limit of $5,000 per candidate prevents any meaningful political engagement by telephone except by automated call.

The Illinois Family Institute (IFI) is exempt from federal income tax under IRC section 501(c)(3). IFI is a non-profit ministry dedicated to upholding and re-affirming marriage, family, life and liberty in Illinois. IFI works to advance public policy initiatives consistent with Judeo-Christian teachings and traditions, educating citizens so that they can better influence their local communities and the state. IFI does not participate in, or intervene in any political campaign on behalf of any candidate for public office, but does work to educate political leaders. Such education frequently occurs through the use of automated phone calls. IFI is convinced that if the Seventh Circuit's decision below is not reversed, other states, including its own, will follow suit with prohibitive laws similar to Ind. Code § 24-5-14-5.

The Republican Majority Campaign (RMC) is a political action committee, registered with the Federal

Election Commission. RMC supports and opposes political candidates for federal office, and has on numerous occasions, used automated phone calls to voters throughout the United States to accomplish its goals. RMC has determined through its extensive experience that automated phone calls are one of the most cost-effective means of reaching voters. RMC will not use live operators for its calls due to their extreme expense compared to automated calls. RMC has found that automated calls are an "equalizer," allowing it compete against wealthy interests and powerful political incumbents. RMC strongly opposes the Seventh Circuit's decision upholding the restrictions of Ind. Code § 24-5-14-5 and believes if left unchecked, will lead to other jurisdictions adopting similar limits.

STATEMENT

Petitioner Patriotic Veterans, like the majority of the *amici* above, regularly uses automated phone calls to inform, educate, and influence the public *and political leaders*. *See* Petition for Certiorari at 3-4. Contrary to the Seventh Circuit's decision below,[2] the automated phone call is frequently the only cost-

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[2]Reflecting a fundamental disconnect with fiscal realities, the Court of Appeals flippantly opined that "[e]veryone has plenty of ways to spread messages: TV, newspapers and magazines (including ads), websites, social media (Facebook, Twitter, and the like), calls from live persons, and even recorded spiels if a live operator first secures consent." *Patriotic Veterans, Inc. v. Zoeller*, 845 F.3d 303, 306 (7th Cir. 2017). As noted by Petitioner – and as experience has taught several of the *amici* hereto – alternative messaging is frequently financially unattainable and/or ineffectual.

effective means for Petitioner and *Amici* to petition political leaders with their concerns.[3]

Absent effective petitioning by the public, such leaders are largely immune from the grievances of the grassroots, perhaps due to the dominant crony-capitalist swamp they are submerged in. The pay-to-play system of rewards so prevalent in modern politics has effectively excluded the "average Joe" from the playing field. He cannot compete in print, television, radio, or even the Internet, lacking the enormous resources of the politically-connected, some of whom have vested decades and billions of dollars in milking the political system. Many of his opponents even control the very media – effectively, "the battlefield" – where political warfare is waged (at least from the public's perspective). In other words, the game is increasingly fixed, with ever-decreasing political pressure relief valves.

This has resulted in a disturbing political phenomena: obscenely high rates of incumbency attended by near-record low approval ratings.[4] In other words, our nation's perpetual political class appears – for now – immune from public discontent. And this should be setting off alarm bells all throughout a

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[3]Petition for Certiorari, at 4.

[4]*See, e.g.*, Louis Jacobson, *Congress Has 11% Approval Ratings but 96% Incumbent Reelection Rate, Meme Says*, Politifact (November 11, 2014), http://www.politifact.com/truth-o-meter/statements/2014/nov/11/facebook-posts/congress-has-11-approval-ratings-96-incumbent-re-e/

Republic dependent on public confidence and participation.

How is this corrected? By an engaged public with effective tools like the modern-day petition – an automated phone call – that calls a distant political class to account. When tens of thousands of constituents are harnessed by common cause to call their legislators,[5] the impact can be immediate. Of course, this is deeply disturbing to a political class that has grown accustomed to the crony-rewards system. From their perspective, pesky voters have no business disrupting the system of spoils bought and paid for with their currency of compromised integrity.

So the political class resorts to passing laws such as Ind. Code § 24-5-14-5, creating prohibitive costs so as to eliminate this troublesome mode of accountability. Of course, legislators claim to be well-intentioned, wanting to eliminate the supposed pervasive evil of intrusive, unwanted calls.[6] But this is really just pretense, as any voter who wishes to avoid such calls may simply join national or state "do-not-call" lists.[7]

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[5]By means of an automated transfer, immediately following the automated phone call, to their legislator's office. Petition for Certiorari, at 36.

[6]*Patriotic Veterans,* 845 F.3d at 305.

[7]Petition for Certiorari, at 25 ("A do-not-call list for automated political calls would address any concerns over 'annoyance' without the sweep of the current restrictions on automated political calls").

As objectionable as it may seem to some, the automated telephone call can serve as a modern-day petition for redress of grievances, an effective means of political engagement protected by the First Amendment. Some fifty years ago, Justice Douglas presciently observed:

> The right to petition for the redress of grievances . . . is not limited to writing a letter or sending a telegram to a congressman; it is not confined to appearing before the local city council, or writing letters to the President or Governor or Mayor. *See NAACP v. Button*, 371 U.S. 415, 429-431 (1963). Conventional methods of petitioning may be, and often have been, shut off to large groups of our citizens. Legislators may turn deaf ears. . . . Those who do not control television and radio, those who cannot afford to advertise in newspapers or circulate elaborate pamphlets may have only a more limited type of access to public officials. Their methods should not be condemned as tactics of obstruction and harassment as long as the assembly and petition are peaceable . . . .[8]

And this is precisely what Petitioner and the similarly-situated *Amici* seek here: the freedom to effectively petition the political class with grievances through automated calls, as allowed by the First Amendment.

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[8] *Adderly v. Florida*, 385 U.S. 39, 49-51 (1966) (Douglas, J., dissenting)..

SUMMARY OF ARGUMENT

The ubiquitous automated telephone call – known in common parlance as the "robocall" – is an economical method by which some of the most disenfranchised citizens of the Republic may petition increasingly unresponsive political leaders for redress of grievances. And for at least some of the instant *amici*, it is the *only* cost-effective manner is which such petitions may be made. Importantly, the First Amendment to the U.S. Constitution jealously guards the right of citizens to peaceably petition for redress of grievances, free from governmental interference. Nevertheless, the Seventh Circuit upheld Indiana's statute, Ind. Code § 24-5-14-5, effectively banning the robocall method of redress, ignoring the Petition Clause itself, and erroneously claiming sufficient avenues of other messaging. This Court should grant the Writ, reverse the lower court's decision, and affirm the Founders' robust protections to the People's right to petition for redress of grievances.

REASONS FOR GRANTING THE WRIT

The Ancient Right of Petition Guaranteed by the First Amendment is an Essential Safeguard of a Free State and Demands Robust Protection by this Court

Among the First Amendment's expressive rights of speech, press, and assembly, the People's right to petition for redress of grievances has received scant attention in contemporary jurisprudence. This is despite the fact that the right of citizens to petition –

predating by centuries the freedoms of speech and press – is a fundamental character of free societies. Given its importance, particularly in view of the growing chasm between citizens and their near-perpetual elected class, this Court should seize this opportunity to announce robust protections to this capstone right.

I. Early English and Colonial Law Establish the Ancient and Foundational Character of the Right to Petition

Sir William Blackstone traced the right of petition in English common law to King Charles the First, whose reign began in 1625. 1 W. Blackstone, Commentaries on the Laws of England, at *128. But the right itself originated at least[9] four hundred years before that with Magna Carta (1215) that, for the first time, provided a legal framework by which barons could petition for redress of grievances with the king.[10]

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[9]One scholar suggests an earlier origin, citing to petitions to Edgar the Peaceful, an English king whose reign began in 959. *See* Gregory Mark, *The Vestigial Constitution: The History and Significance of the Right to Petition*, 66 Fordham L. Rev. 2153 (1998), at 2163 n.24. http://ir.lawnet.fordham.edu/flr/vol66/iss6/4.

[10]"[I]f we or our justiciar, or our bailiffs, or any of our servants shall have done wrong in any way toward any one, or shall have transgressed any of the articles of peace or security; and the wrong shall have been shown to four barons of the aforesaid twenty-five barons, let those four barons come to us or to our justiciar, if we are out of the kingdom, laying before us the transgression, and let them ask that we cause that transgression to be corrected without delay." Magna Carta, http://press-pubs.uchicago.edu/founders/documents/amendI_ass

Initially, these early English petitions were not vehicles that necessarily "created or reinforced a sense of political power on the part of the petitioner"; in fact, most petitions "reinforced royal authority."[11]

However, over time the use of petitions to call attention to grievances with the king increased significantly, as did their concomitant importance to the majority of English subjects who had limited access to the royal council.[12] And as the role of the English parliament grew, so did petitions to its members until, eventually, grievances actually came to dominate the legislative calendar.[13] Ultimately, the right to petition

> came to be regarded as part of the Constitution, that fabric of political customs which defined English rights. That is, by its use, petition came to be such a clear part of English political life that, certainly by the seventeenth century . . . petitioning was [considered] an ancient right.[14]

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emblys1.html.

[11]Mark, *supra* note 9, at 2163-2164.

[12]*Id.* at 2165.

[13]*Id.* at 2166.

[14]*Id.* at 2169 (*citing* James G. Wilson, *American Constitutional Conventions: The Judicially Unenforceable Rules That Combine with Judicial Doctrine and Public Opinion to Regulate Political Behavior*, 40 Buff. L. Rev. 645 (1992)).

Consistent with this shared legal history, the "ancient right" to petition was recognized by virtually all of American colonial society.[15] A number of colonial governments even enumerated express protections to petitioners including Delaware, New Hampshire, North Carolina, Pennsylvania, Vermont, and Massachusetts.[16] Colonists actively engaged this right. Prior to the Revolutionary War, numerous petitions for redress were submitted from a broad class of residents (free citizens of varying means, and sometimes even slaves, indentured servants, Native Americans, free blacks, and women) on a broad range of topics (creating/regulating local communities, parish boundaries, moving public buildings, occupational issues, financial assistance, imprisonment, licensing, religion, etc).[17]

Of course, the most memorable of colonial petitions involved complaints against King George in the run up to the Revolutionary War. Two years prior to Independence, the First Continental Congress encouraged such petitions, announcing in its 1774 Declaration and Resolves that

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[15]Mark, *supra* note 9, at 2191.

[16] Julie Spanbauer, *The First Amendment Right to Petition Government for a Redress of Grievances: Cut From a Different Cloth*, 21 Hastings Const. L.Q. 15, 27-28 (1993), http://repository.jmls.edu/facpubs/226.

[17]Mark, *supra* note 9, at 2178-2186.

> the inhabitants of the English colonies in North-America, by the immutable laws of nature, the principles of the English constitution, and the several charters or compacts, have the . . . right to peaceably to assemble, consider of their grievances, and petition the king.[18]

The 1774 Declaration also made it clear that this right was virtually unlimited: "all prosecutions, prohibitory proclamations, and commitments for the same, are illegal."[19] Petitions to the king followed, but with no positive effect. As the Declaration of Independence noted two years later, "In every stage of these Oppressions We have Petitioned for Redress in the most humble terms: Our repeated Petitions have been answered only by repeated injury."[20] The king's pathetic reaction to the petitioners earned him one of the sternest rebukes of Declaration: "A prince, whose character is thus marked by every act which may define a tyrant, is unfit to be the ruler of a free people."[21]

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[18]http://avalon.law.yale.edu/18th_century/resolves.asp.

[19]*Id.*

[20]http://avalon.law.yale.edu/18th_century/declare.asp.

[21]*Id.*

II. The Founders Intended the Right to Petition Under the US Constitution to be Robust

Given the important role of petitions for redress of grievances under early English law as well as colonial law, it was no surprise that James Madison, in introducing the first nine amendments to the U.S. Constitution in 1789, envisioned a separate amendment for the rights of assembly and petition:

> The people shall not be restrained from peaceably assembling and consulting for their common good; nor from applying to the legislature by petitions, or remonstrances for redress of their grievances.[22]

During the 1789 debate on the proposed Bill of Rights, the only substantive change made to this assembly and petition amendment was the replacement of the word "legislature" with "government,"[23] broadening its application to the executive.[24] Madison's revised

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[22]Spanbauer, *supra* note 16, at 39 (*citing* 1 Documentary History of the First Federal Congress of the United States of America 1789-1791, at 10, 16 (Charlene B. Bickford & Helen E. Veit eds., 1986)).

[23]*Id.* at 40.

[24]Some scholars have argued – and this Court's *dicta* in at least one opinion has suggested – that the First Amendment right of petition may also extend to complaints filed with the judiciary. *See, e.g., Borough of Duryea v. Guarnieri*, 564 U.S. 379, 398-399 (2011). In his partial dissent to the *Guarnieri* majority, Justice Scalia convincingly disagreed: "I find the proposition that a lawsuit is a constitutionally protected 'Petition' quite doubtful.

amendment was then rolled into the single, subsequently-ratified First Amendment containing the additional freedoms of religion, press and speech. According to one scholar, this was due to the exceptional importance of the Petition Clause:

> [P]etitioning was at the core of the constitutional law and politics of the early United States. That was why it was included in the First Amendment, not as an afterthought, but rather as its capstone.[25]

But was this 'capstone right' of the nascent Republic intended to be just the equivalent of what had been enjoyed by the colonists and other subjects of the king? Or was it intended as something even greater? The Anti-Federalists suggested that the new political order wrought by the revolution positively realigned the power dynamic of the People's petition:

> How, then, did petitions fit into this new order? They became not the prayers of supplicants, but the missives "of a free people [to] their servants." While in presenting petitions "[p]ropriety requires that the people

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The First Amendment's . . . . reference to 'the right of the people' indicates that the Petition Clause was intended to codify a pre-existing individual right, which means that we must look to historical practice to determine its scope. There is abundant historical evidence that 'Petitions' were directed to the executive and legislative branches of government, not to the courts." *Id.* at 403 (citations omitted).

[25]Mark, *supra* note 9, at 2157.

> should approach their representatives with a becoming humility," the "governors ... as their servants ... are ... bound to observe decency towards them, and to act according to their instructions and agreeably to conscience." Respect replaced deference and it ran both ways, as befitted a free people communicating among themselves.[26]

The impact on the right to petition of this revolutionary transmutation of government from master to servant of the People could not have been lost on the Founders. They could have only reasonably perceived an enhanced power in the petition, no longer a *supplicant* of the king's subjects, but now a *demand* of the People to whom government is subject.[27]

III. *Patriotic Veterans* is the Proper Vehicle to Resolve Contemporary Ambiguity about this 'Capstone' Right

Despite over 225 subsequent years of constitutional interpretation and application, the Petition Clause's legal ambiguity abounds. Why?

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[26]Mark, *supra* note 9, at 2205 (*quoting* Philadelphiensis, No. 5, *reprinted in* 3 The Complete Anti-Federalist 117 (Herbert J. Storing ed., 1981)).

[27]*Id.* at 2206-2207 ("Anti-Federalist . . . Philadelphiensis asked and answered his own question: 'Is it improper for freemen to petition for their rights? If it be; then I say that the impropriety consisted only in their not demanding them'") (*quoting* Philadelphiensis, No. 5, *reprinted in* 3 The Complete Anti-Federalist 116 (Herbert J. Storing ed., 1981)).

Because of the rights set forth in the First Amendment, the right to petition has – by far – "engendered the least discussion among litigants, judges, and scholars."[28] Some scholars have facilely concluded that such silence reflects "petitioning['s] demise soon after (or at least within a few decades after) it was secured in the First Amendment."[29] Nevertheless, there is a smattering of Supreme Court jurisprudence on the subject that offers some guidance here.

In *United Mine Workers of America v. Illinois Bar Assn.*, 389 U.S. 217 (1967), the Supreme Court considered the scope of the Petition Clause in protecting the right of union workers to collectively hire an attorney to represent them in workers' compensation claims. The Illinois Bar Association had deemed such an arrangement to be the "unauthorized practice of law."[30] In considering the Union's First Amendment challenge, the *United Mine Workers* Court started with the premise that "the rights to assemble peaceably and to petition for a redress of grievances **are among the most precious of the liberties safeguarded by the Bill of Rights**."[31] The Court

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[28]Spanbauer, *supra* note 16, at 16.

[29]Mark, *supra* note 9, at 2212.

[30]*Id.* at 218.

[31]*Id.* at 222 (emphasis added). Almost a hundred years before, the Court made a similar pronouncement: "The very idea of a government, republican in form, implies a right on the part of its citizens to . . . petition for a redress of grievances." *United States*

determined that the First Amendment would be nothing more than

> a hollow promise if it left government free to destroy or erode [these] guarantees by indirect restraints so long as no law is passed that prohibits free speech, press, petition, or assembly as such. We have therefore repeatedly held that laws which actually affect the exercise of these vital rights cannot be sustained merely because they were enacted for the purpose of dealing with some evil within the State's legislative competence, or even because the laws do, in fact, provide a helpful means of dealing with such an evil.[32]

Although the Court offered little more of its perspective on the Petition Clause, it struck down the Illinois Bar Association's prohibition, stating it was not "needed to protect the State's interest in high standards of legal ethics."[33]

Almost twenty years later, the Court revisited the Petition Clause in *McDonald v. Smith*, 472 U.S. 479 (1985). The Court reaffirmed the right to petition as a fundamental right – "'among the most precious of the liberties guaranteed by the Bill of Rights'" – and

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v. Cruikshank, 92 U.S. 542, 552 (1876).

[32] *United Mine Workers*, 389 U.S. at 222 (*citing Schneider v. State*, 308 U.S. 147 (1939); *Cantwell v. Connecticut*, 310 U.S. 296 (1940)).

[33] *United Mine Workers*, 389 U.S. at 225.

declared it "was inspired by the same ideals of liberty and democracy that gave us the freedoms to speak, publish, and assemble."[34] It also noted that "except in the most extreme circumstances citizens cannot be punished for exercising this right 'without violating those fundamental principles of liberty and justice which lie at the base of all civil and political institutions.'"[35]

More recently, in *Borough of Duryea v. Guarnieri*, 564 U.S. 379, 395 (2011), this Court addressed the Petition Clause in the context of a lawsuit filed by a public employee against his municipal employer. In analyzing the argument that the lawsuit was a protected petition under the First Amendment, the Court first engaged in an extensive historical review of petition rights.[36] Consistent with earlier opinions, it determined that "[p]etition, as a word, a concept, and an essential safeguard of freedom, is of ancient significance in the English law and the

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[34]*Id.* at 485-486 (*quoting United Mine Workers*, 389 U.S. at 222); *see also Dresner v. City of Tallahassee*, 375 U.S. 136, 146 (1963) ("It is fundamental that our constitutions accord to the citizen of the United States the right of freedom of speech and of assembly and to peaceably petition for a redress of grievances. Such freedoms are jealously guarded, and, when exercised in good faith and in good order, may not be lawfully, interfered with by governmental action").

[35]*Id.* at 486 (*quoting De Jonge v. Oregon*, 299 U.S. 353, 364 (1937)).

[36]*Id.* at 394-397.

Anglo-American legal tradition."[37] It then proceeded to expand its reach in a questionable direction.

Although the Court failed to identify any historical support for its contention that petition rights include appeals to the judiciary (via lawsuit), and even though it still has never actually *held* that petitions for redress of grievances include such lawsuits,[38] it cited with approval "[t]his Court's precedents [purportedly] confirm[ing] that the Petition Clause protects the right of individuals to appeal to courts and other forums established by the government for resolution of legal disputes."[39] The Court concluded, however, that in the context of suits by government employees, only claims advancing public – as opposed to private – concerns would be afforded Petition Clause protection.[40]

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[37]*Id.* at 395.

[38]*Cf. id.* at 402 (Scalia, J., *dissenting in part*) ("the Court has never actually held that a lawsuit is a constitutionally protected 'Petition,' nor does today's opinion hold that").

[39]*Id.* at 387 (*citing Sure-Tan, Inc. v. NLRB*, 467 U.S. 883, 896-897 (1984); *BE&K Constr. Co. v. NLRB*, 536 U.S. 516, 525 (2002); *Bill Johnson's Restaurants, Inc. v. NLRB*, 461 U.S. 731, 741 (1983); *California Motor Transport Co. v. Trucking Unlimited*, 404 U.S. 508, 513 (1972); *but see* note 24, *supra*.

[40]*Borough of Duryea*, 564 U.S. at 398. However, Judge Gorsuch, writing for a unanimous 10th Circuit panel, rejected the public-private distinction for non-governmental employees:

> [A] private citizen exercises a constitutionally protected First Amendment right anytime he or she petitions the government for redress; the petitioning clause of the First Amendment does

But importantly to the writ at bar, the *Duryea* Court properly determined that the Petition Clause is *not* coextensive with the Speech Clause:

> Courts should not presume there is always an essential equivalence in the two Clauses or that Speech Clause precedents necessarily and in every case resolve Petition Clause claims. Interpretation of the Petition Clause must be guided by the objectives and aspirations that underlie the right.[41]

Despite this perceptive acknowledgment, as well as the ancient and disparate origins of the right to petition vis-à-vis the other expressive First Amendment rights, there has not been any real effort to delineate lines of demarcation between those clauses.[42] In view of the historical importance of the

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> not pick and choose its causes. The minor and questionable, along with the mighty and consequential, are all embraced.

Van Deelen v. Johnson, 497 F.3d 1151, 1156 (10th Cir. 2007).

[41]*Borough of Duryea*, 564 U.S. at 388-389.

[42]The *Duryea* Court suggested it avoided such an effort, in part, because a "different rule for each First Amendment claim would . . . add to the complexity and expense of compliance with the Constitution." *Id.* at 393. Justice Scalia criticized this approach, noting "[t]he complexity of treating the Petition Clause and Speech Clause separately is attributable to the inconsiderate disregard for judicial convenience displayed by those who ratified a First Amendment that included both provisions as separate constitutional rights." *Id.* at 405.

Petition Clause, and its core role in maintaining a free state, the instant case provides an exceptional opportunity to explore the boundaries of this foundational right.

CONCLUSION

For the foregoing reasons, Patriotic Veterans, Inc.'s Petition should be granted.

Respectfully submitted,

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May 5, 2017

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