No. 20-843

In the Supreme Court of the United States

NEW YORK STATE RIFLE & PISTOL ASS'N, ET AL.,

Petitioners,

v.

KEVIN P. BRUEN, IN HIS OFFICIAL CAPACITY AS SUPERINTENDENT OF THE NEW YORK STATE POLICE, ET AL.,

Respondents.

On Writ of Certiorari to the United States Court of Appeals for the Second Circuit

BRIEF AMICUS CURIAE OF AMERICAN CONSTITUTONAL RIGHTS UNION IN SUPPORT OF PETITIONERS

John J. Park, Jr.
Counsel for *Amicus Curiae*
616-B Green Street
Gainesville, GA 30501
(470) 892-6444
jackparklaw@gmail.com

QUESTION PRESENTED

As reframed by the Court, the Question Presented is:

Whether the State's denial of petitioners' applications for concealed-carry licenses for self-defense violated the Second Amendment.

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STATEMENT OF AMICUS CURIAE[1]

The American Constitutional Rights Union (ACRU) is a nonpartisan, nonprofit legal policy organization formed pursuant to Section 501(c)(3) of the Internal Revenue Code dedicated to educating the public on the importance of constitutional governance and the protection of our constitutional liberties. The ACRU Policy Board sets the policy priorities of the organization and includes some of the most distinguished statesmen in the Nation on matters of free speech and election law. Current Policy Board members include: the 75th Attorney General of the United States, Edwin Meese III; Charles J. Cooper, the former Assistant Attorney General for the Office of Legal Counsel; former Federal Election Commissioner Hans von Spakovsky; and J. Kenneth Blackwell, the former U.S. Ambassador to the United Nations Human Rights Commission and Ohio Secretary of State.

The ACRU's mission includes defending the Second Amendment rights of the American people. It is committed to insuring that the individual right of Americans to own guns which the Court recognized in *District of Columbia v. Heller*, 554 U.S. 570 (2008), is not undermined by the federal, state, or local governments. To protect this fundamental right, ACRU has filed amicus briefs in *New York State Rifle*

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[1] The parties have consented to the filing of this brief. *See* Sup. R. 37.3(a). Pursuant to Rule 37.6, *amicus curiae* affirms that no counsel for any party authored this brief in whole or in part, and no counsel or party made a monetary contribution intended to fund the preparation or submission of this brief.

& Pistol Ass'n v. City of New York, 140 S. Ct. 1525 (2020), and in support of the Petitioners in *Lane v. Holder*, 703 F. 3d 668 (4th Cir. 2012), cert. denied, 134 S. Ct. 1273 (2014), and *Woollard v. Gallagher*, 712 F.3d 865 (4th Cir. 2013), cert. denied, 134 S. Ct. 422 (2013).

SUMMARY OF ARGUMENT

In *Heller*, this Court understandably declined to "clarify the entire field" governing the right to keep and bear arms. 554 U.S. at 635. In particular, other than rejecting a proposed judicial interest-balancing analysis, it declined to specify the standard of review to be applied in future cases, concluding that the District of Columbia's total ban on the possession of handguns in the home was in no way constitutional. Strict scrutiny is particularly appropriate to examine claimed infringements of enumerated, fundamental rights. Such rights are too important to be remanded to intermediate scrutiny, particularly when the lower courts fail to hold government to its burdens.

The result in this case should reflect the understanding that "the Second Amendment's core at a minimum shields the typically situated citizen's ability to carry common arms [outside the home] generally." *Wrenn v. District of Columbia*, 864 F.3d 650, 667 (D.C. Cir. 2017). Law-abiding citizens deserve the right to choose to carry without the blessing of government bureaucrats.

ARGUMENT

I. The right to keep and bear arms guaranteed by the Second Amendment is an individual right grounded in the inherent right of self-defense.

In *District of Columbia v. Heller*, the Court explained that the "operative clause of the Second Amendment, "which protects the "right of the people to keep and bear arms" from infringement, creates an individual right, not a "collective" one that "may be exercised only through participation in some corporate body." 584 U.S. 570, 579 (2008). The individual nature of the right "contrasts markedly" with the prefatory clause, which speaks of forming a "well regulated militia," because "the 'militia' in colonial America consisted of a subset of 'the people'—those who were male, able bodied, and within a certain age range." *Id.* at 580. "The Second Amendment 'elevates above *all* other interests the right of law-abiding, responsible citizens to use arms in defense of hearth and home'—a right that is at the 'core' of the Second Amendment." *Binderup v. Attorney General*, 836 F. 3d 336, 358 (3d Cir. 2016) (en banc) (Hardiman, J., concurring in part and concurring in the judgments) (quoting *Heller*, 554 U.S. at 635, and adding emphasis). *Heller* further "ma[de] it clear" that the right of self-defense, which the Second Amendment protects, is both "fundamental to our scheme of ordered liberty" and "deeply rooted in this Nation's history and tradition." *McDonald v. Chicago*, 130 S. Ct. 3020, 3036-42 (2010).

The *Heller* Court further found that the creation of a militia and an individual right to keep and bear arms "fit[] perfectly, once one knows the history that the founding generation knew." *Heller*, 554 U.S. at 598. It noted, "That history showed that the way tyrants had eliminated a militia consisting of all able-bodied men was not by banning the militia but simply by taking away the people's arms, enabling a select militia or standing army to suppress political opponents." *Id*.

II. This Court should take the opportunity to clarify the standard of review applicable to review of Second Amendment claims.

The Second Amendment's historical grounding as an individual and fundamental right should guide the Court as it determines what standard of review should be applied.

First, the right to keep and bear arms is a fundamental right. As this Court held in *McDonald*, that right is both "fundamental to our scheme of ordered liberty," and "deeply rooted in this Nation's history and traditions." 130 S. Ct. at 3036. Before any such fundamental right is infringed or taken away, the Government should be required to show that its action is narrowly tailored to the pursuit of a significant state interest. Any less rigor would make the Second Amendment would make it " a second-class right, subject to an entirely different body of rules than the other Bill of Rights guarantees," a step this Court declined to take in *McDonald*. 130 S. Ct. at 3044.

Second, as the D.C. Circuit has noted, the right to bear arms stands on an "equal footing" with the right to possess them. *Wrenn v. District of Columbia*, 864 F.3d at 663. It follows, then, that "[t]he rights to keep and to bear, to possess and to carry, are equally important inasmuch as regulations on each must leave alternative channels for both." *Id*. And, "carrying beyond the home, even in populated areas, even without special need, falls within the Second Amendment's coverage, indeed within its core." *Id*. at 664.

Third, in *Heller,* this Court rejected the suggestion that Second Amendment claims be reviewed under an "'interest-balancing inquiry.' 554 U.S. at 634. It observed that, in dissent, Justice Breyer proposed "a judge-empowering 'interest-balancing inquiry' that 'asks whether the state burdens a protected interest in a way or to an extent that is out of proportion to the salutary effects upon other important governmental interests.'" *Id*. (quoting *Heller*, 128 S. Ct. at 2852 (Breyer, J., dissenting). An interest-balancing judge would uphold the constitutionality of the handgun ban "because handgun violence is a problem, because the law is limited to an urban area, and because there were somewhat similar restrictions in the founding period (a false proposition as we have already discussed)." *Id*., 554 U.S. at 634.

As noted, the Court rejected the interest-balancing approach. It explained, "We know of no other enumerated constitutional right whose core protection has been subjected toa free-standing 'interest-balancing' approach." *Id*. Indeed, "[t]he very

enumeration of the right takes it out of the hands of government—even the Third Branch of Government—the power to decide on a case-by-case basis whether the right is *really worth* insisting upon." *Id.* (emphasis in original). Put simply, "[a] constitutional guarantee subject to future judges' assessment of its usefulness is no constitutional guarantee at all." *Id.*

More to the point, the First Amendment is not subject to an interest-balancing analysis. It "contains the freedom-of-speech guarantee that the people ratified, which included exceptions for obscenity, libel, and disclosure of state secrets, but not for the expression of extremely unpopular and wrong-headed ideas." 554 U.S. at 635. "The Second Amendment is no different." *Id.* It, too, "is the very product of an interest balancing by the people," one that "elevates above all other interests the right of law-abiding, responsible citizens to use arms in defense of hearth and home." *Id.*

The Second Amendment should receive the same respect as the First by being protected by heightened scrutiny of attempts to infringe on the rights guaranteed.

A. This Court should apply strict scrutiny

Three levels of scrutiny constitute widely used tiers of judicial review. Each entails a presumption, an ends-means assessment regarding government interests and tailoring, and an evidentiary burden.

The most lenient standard, rational basis review plays no part in the analysis of the claims in this case. As the Court observed in *Heller*, rational basis review cannot "be used to evaluate the extent to which a legislature may regulate a specific, enumerated right be it the freedom of speech, the guarantee against double jeopardy, the right to counsel, or *the right to keep and bear arms*." 554 U.S. at 629 n.27 (emphasis added).

Strict scrutiny is the most demanding test. Under it, laws "are presumptively unconstitutional and may be justified only if the government proves that they are narrowly tailored to serve compelling state interests." *Reed v. Town of Gilbert*, 135 S. Ct. 2218,2226 (2015). The government must prove by a "strong basis in evidence" that its chosen means advances its purported objective. See, e.g., *Richmond v. J.A. Croson Co.*, 488 U.S. 469, 500 (1989). The government bears the burden of proving that its action satisfies strict scrutiny. *Nat'l Inst. of Family & Life Advocates v. Becerra*, 138 S. Ct. 2361, 2377 (2018).

Under intermediate scrutiny, to be upheld a law must be "narrowly tailored to serve a significant government interest." *McCullen v. Coakley*, 134 S. Ct. 2518, 2434 (2014). As shown in the discussion below, the law is still presumed invalid, and the state bears the burden of showing that its regulation is narrowly tailored.

Strict Scrutiny should be applied for several reasons. First, it is more appropriate in when considering infringements on specific, enumerated

rights. See, e.g., *United States v. Carolene Products*, 304 U.S. 114, 152 n.4 (1938) (Enhanced scrutiny is particularly appropriate when legislation impacts "a specific prohibition of the Constitution, such as those of the first ten Amendments."). It requires a measure of proof that intermediate scrutiny does not, and that measure of proof guarantees that government has a good reason for acting as it does. Likewise, it does a better job of insuring that the regulation does not burden more constitutionally protected activity than necessary.

Strict scrutiny is also less malleable than intermediate scrutiny. While each standard involves a measure of labeling, an important or significant governmental interest is more subject to a generous reading that a compelling interest. The same is true of the "reasonable fit" that can pass for a narrow tailoring analysis under intermediate scrutiny. See *Drake v. Filko*, 724 F. 3d 426, 436 (3d Cir. 2013). When fundamental, enumerated rights are at issue, less malleability and more rigor are warranted than intermediate scrutiny provides.

B. If intermediate scrutiny is to be applied, that application must be rigorous.

This Court has twice shown that intermediate scrutiny has teeth. In *McCullen v. Coakley*, 573 U.S. 464 (2014), the Court invalidated a Massachusetts law establishing a "bubble" around abortion facilities because it was not narrowly tailored. In addition, the Court held declared the male-only admissions policy at Virginia Military Institute unconstitutional.

United States v. Virginia, 518 U.S. 515 (1996). In both cases, the Court applied intermediate scrutiny.

In *McCullen*, the Court defined intermediate scrutiny to require the law to be "narrowly tailored to serve a significant governmental interest." *Id*. at 2534 (quoting *Ward v. Rock Against Racism*, 491 U.S. 781, 796 (1989)). It pointed out that such regulations must be narrowly tailored such that they must not "burden substantially more speech than is necessary to further the government's interests." *Id*. at 2535 (quoting *Ward*, 491 U.S. at 799 (1989)). Even if the restriction is not the least restrictive alternative, the government "still 'may not regulate expression in such a manner that a substantial portion of its burden on speech does not advance its goals.'" *Id*. (quoting *Ward*, 491 U.S. at 799).

The Court held that the Massachusetts law at issue failed the narrow tailoring requirement. That law imposed "serious burdens" on speech and made it "substantially more difficult ... to distribute literature" on public sidewalks, both of which are First Amendment injuries. *Id*. at 2535-36. It also observed that other laws, including generic criminal laws and as well as "existing local ordinances" could do the work of the Massachusetts law either criminally or civilly "without excluding individuals from areas historically open for speech and debate." *Id*. at 2539. In fact, Massachusetts could not "identify a single prosecution brought under those laws within at least the last 17 years." *Id*. Put simply, "the Commonwealth has not shown that it seriously undertook to address the problem with less intrusive tools readily available to it." *Id*.

To be sure, New York's law cannot be viewed as a time, place, and manner restriction on the bearing of arms outside the home, which is the way the Court treated the Massachusetts law in *McCullen*. 134 S. Ct. at 2535. That New York law admits of so few exceptions that it operates as an all but total ban. It does not regulate "time," because the regulatory answer is, at best, exceedingly rare. The law does not regulate the "place" where ordinary, law-abiding citizens can exercise their Second Amendment rights outside the home, because the answer is "nowhere." And, it does not regulate the "manner" in which a citizen can exercise the right to bear arms, because the answer is "none." Put simply, New York "effectively ban[s] possession by everyone but that small minority with a special need to possess." *Wrenn*, 864 F. 3d at 664.

In *United States v. Virginia*, the Court emphasized that the intermediate scrutiny standard amounts to "skeptical scrutiny of official action" and requires the government to "demonstrate an exceedingly persuasive justification." 518 U.S. at 531 (internal quotation marks omitted). When intermediate scrutiny is applied, there is a "strong presumption" that the official action is unconstitutional. *Id*. at 532. "The burden of justification is demanding and rests entirely on the State." *Id*. at 533. "The justification must be genuine, not hypothesized or invented ad hoc in response to litigation." *Id*. Moreover, the State's argument "must not rely on overbroad generalizations." *Id*. Thus, although not so demanding as strict scrutiny, satisfying intermediate scrutiny is a daunting and demanding challenge for the government.

C. The lower courts are split, and that split reveals fundamental differences in the courts' understanding of the Second Amendment and of the levels of judicial scrutiny.

The District of Columbia and Seventh Circuits have each found good cause permitting schemes invalid, while the First, Second, Third, and Fourth have upheld them. This Court should follow the lead of the D.C and Seventh Circuits.

1. Good cause regimes like that of New York operate as total bans on the public bearing of arms and cannot stand constitutional scrutiny.

In *Wrenn v. District of Columbia*, the D.C. Circuit concluded that the District of Columbia's good cause requirement operated as a total ban on carrying arms outside the home. The court explained, "[T]he good reason law is necessarily a total ban on most D.C. residents right to carry a gun in the face of ordinary self-defense needs, where the residents are no more dangerous with a gun than the next law-abiding citizen. We say 'necessarily' because the law destroys the ordinary citizen's right to bear arms mot as a side effect of applying other, reasonable regulations but by design." *Id.* at 666 (internal parenthetical deleted). That total ban was what this Court confronted in *Heller*, so consideration of tiers of scrutiny was unnecessary. No such total ban can stand.

In *Moore v. Madigan*, the Seventh Circuit struck down an Illinois law prohibiting most citizens from carrying "a gun ready to use (loaded, immediately accessible, that is, easy to reach—and uncased)." 702 F. 3d at 934. Like the D.C. Circuit, the court reasoned that the right to bear arms is not limited to the home. As the court noted, the need for self-defense arises outside the home. "To confine the right to be armed to the home is to divorce the Second Amendment from the right of self-defense described in *Heller* and *McDonald*." *Id*. at 937. It found Illinois' defense of its policy lacking, observing,"[T]he empirical literature on the effects of allowing the carriage in guns fails to establish a pragmatic defense of the Illinois law." *Id*. at 939. In sum, "A blanket prohibition on carrying [a] gun in public prevents a person from defending himself anywhere except inside his home, and so substantial a curtailment of the right of armed self-defense requires a greater showing of justification than merely that the public *might* benefit from such a curtailment, though there is no proof it would." *Id*. at 940 (emphasis in original).

2. The results in the First, Second, Third, and Fourth Circuits reflect an improperly, relaxed application of intermediate scrutiny.

The First, Second, Third, and Fourth Circuits each err in starting, explicitly or implicitly, with a presumption that the law is valid. That leads them to accept the government's showing (or in the case of the Third Circuit, to excuse the failure to make one). As it acknowledged, "New Jersey has not presented us with much evidence to show how or why its legislators arrived at its predictive judgment." *Drake v. Filko*,

724 F. 3d 426, 437 (3d Cir. 2013). In *Woollard v. Gallagher*, which was decided in 2013, the Fourth Circuit considered data that were "adopted in 2002," but "derived without substantive change from . . . 1972." 712 F. 3d at 877. However, both that data and the more recent data cited by the court concern only the unlawful use of handguns by criminals. See *id.*at 877-78. None of it supports the contention that indiscriminately preventing law-abiding citizens from carrying handguns advances in any way the State's interest in public safety.

The Second Circuit's decision in *Kachalsky v. City of Westchester*, 701 F.3d 81 (2d Cir. 2012), is the circuit predecessor to this case[2]. See *New York State Rifle & Pistol Ass'n v. Bruen*, Pet. Appx. at App-2. *Kachalsky* rests on a cramped view of *Heller*, reasoning that strict scrutiny should not apply because bearing arms outside the home "falls outside the core" of the right protected by the Second Amendment. *Id.* at 94. In its words, "New York's licensing scheme affects the ability to carry handguns only **in public**, while the District of Columbia ban applied only **in the home**. *Id.* (emphasis in original). That distinction is an exercise in missing the constitutional point. As Judge Posner observed, "[A] Chicagoan is a good deal more likely to be attacked on a sidewalk in a rough neighborhood than in his

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[2] In *Kachalsky*, the court declared that "New York's proper cause requirement does not operate as a complete ban on the possession of handguns in public." *Id.* at 91. The ban's lack of completeness is small comfort to the ordinary, law-abiding people who cannot make their way through the narrow gate of "proper cause."

apartment on the 35th floor of the Park Tower." *Moore v. Madigan*, 702 F.3d 933, 937 (7th Cir. 2012).

Applying intermediate scrutiny, the court first looked for substantial relationship between the regulation and the state's interest in public safety and crime prevention. In so doing, it gave "substantial deference to the predictive judgements" of the legislature. *Id*. at 97 (quoting *Turner Broad. Sys., Inc. v. FCC*, 520 U.S. 180,195 (1997)).[3] The court acknowledged, "To be sure, we recognize the existence of studies and data challenging the relationship between handgun ownership by lawful citizens and violent crime." *Id*. at 99. New York had its studies too, though, so the court left it to the legislature to make the judgment. *Id*.

In *Drake v. Filko*, 724 F.3d 426 (3d Cir. 2013), the Third Circuit similarly employed a deferential analysis redolent of rational basis review. It began by characterizing New Jersey's licensing scheme to be presumptively lawful," *id*. at 429, 434, a declaration that is inconsistent with intermediate scrutiny. When considering New Jersey's justification for its

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[3] In *Turner Broadcasting*, that "substantial deference" is not unqualified. The Court goes on to state, "Our sole obligation is "to assure that, in formulating its judgements, Congress has drawn reasonable inferences based on substantial evidence." 520 U.S. at 195 (quoting *Turner Broadcasting Systems v. FCC*, 512 U.S. 622, 666 (1994)). And, as Justice O'Connor noted in dissent, nothing in that deference relieves the Court of its "independent duty to identify with care the Government interests supporting the scheme, to inquire into the reasonableness of congressional findings regarding its necessity, and to examine its fit between its goals and consequences." 520 U.S. at 229 (O'Connor, J., dissenting).

justifiable need provision, it "refuse[d] to hold that the fit here is not reasonable because New Jersey cannot identify a study or tables of crime statistics upon which it based its predictive judgment." *Id*. at 438. In other words, it relieved the state of its burden under intermediate scrutiny to support its law.

In both *Kachalsky* and *Drake*, the courts also stretched the meaning of "longstanding" and "presumptively lawful" regulations. When the Court spoke to this point in *Heller*, it declared, "[N]othing in our opinion should be taken to cast doubt on long-standing prohibitions on the possession of firearms by felons and the mentally ill, or laws prohibiting the carrying of firearms in sensitive places such as schools and government buildings." 554 U.S. at 666. The Second and Third Circuits each pointed to how long their state's restrictive schemes had been around. See *Kachalsky*, 701 F. 3d at 97 ("New York's legislative judgment concerning handgun possession in public was made one-hundred years ago."); *Drake*, 724 F.3d at 433 ("nearly 90 years"). The Court's *Heller* examples, though, are of narrower scope. As Judge Posner noted, ""[When a state bans guns merely in particular places, such as public schools, a person can preserve an undiminished right of self-defense by not entering those places." *Moore*, 702 F. 3d at 940. In contrast, the New York and New Jersey regulatory regimes leave few alternatives for those who wish to exercise their right to bear arms.

Similarly, the Second and Third Circuits fail to require that government show a substantial relationship between its interest and its actions. Intermediate scrutiny demands that there be a

substantial relationship, not just a "reasonable fit. . . such that the law does not burden more conduct than is reasonably necessary." See *Drake*, 712 F. 3d at 436. It did not discuss any evidence that the state considered less burdensome alternatives.

For its part, the Second Circuit spoke of "[t]he connection between promoting public safety and regulating handgun possession in public." *Kachalsky*, 701 F. 3d at 98. It did not explain why restricting public handgun possession by the law-abiding component of the population is sufficiently tailored to combatting criminals' use of firearms.

The First Circuit upheld the Massachusetts firearms licensing statute, as enforced in Boston and Brookline. *Gould v. Morgan*, 907 F.3d 659 (1st Cir. 2018). It concluded, "[T]he core Second Amendment right is limited to self-defense in the home." *Id*. at 671. As a result, any right to self-defense outside the home "is plainly more circumscribed." *Id*. at 672. The court applied intermediate scrutiny and found a "close enough" fit between the government interest and its regulation. Like the Second, Third, and Fourth Circuits, it threw up its hands in the face of conflicting studies, leaving it to the legislature to make a predictive judgment. *Id*. at 676.[4]

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[4] The First Circuit's reliance on *Holder v. Humanitarian Law Project*, 561 U.S. 1, 34 (2009), is misplaced. See 907 F. 3d at 673. *Holder* involved a national security matter, *id*. at 8, where federal power is at its zenith. See, e.g., *Rostker v. Goldberg*, 453 U.S. 57, 68 (1982); *Zemel v. Rusk*, 381 U.S. 1, 17 (1965). Moreover, the Court rejected a facial First Amendment claim in that case because it was not so much about protecting speech as it was that the statute deprived international terrorists of

The Fourth Circuit likewise upheld Maryland's conditioning of permits for public carrying arms on having a "good and substantial reason" to carry. *Woollard v. Gallagher*, 712 F. 3d 865 (4th Cir.), cert. denied, 134 S. Ct. 422 (2013). Relying on circuit precedent, the court adhered to a distinction between bearing arms in public and carrying them at home. It found itself "in agreement" with much of the then-recent decision in *Kachalsky*. *Id*. at 881. Like the Second and Third Circuits, the court said it was a legislative decision to which it would defer stating that it could not "substitute" the views of those challenging the "good and substantial reason" rule "for the considered judgment of the General Assembly." *Id*.

The decisions of the First, Second, Third, and Fourth Circuits are flawed, and this Court should not follow them.

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funding and international dispute victories to fuel their murderous activities. *Humanitarian Law Project*, 561 U.S. at 39.

CONCLUSION

For the reasons stated in the Petitioners' Brief and this amicus brief, this Court should reverse the judgment of the Court of Appeals for the Second Circuit.

Respectfully submitted,

John J. Park, Jr.
Counsel of Record for Amicus Curiae
616-B Green Street
Gainesville, GA 30501
(470) 892-6444
jackparklaw@gmail.com