No. 23-719

IN THE
# Supreme Court of the United States

DONALD J. TRUMP,
*Petitioner,*

v.

NORMA ANDERSON, ET AL.,
*Respondents.*

**On Writ of Certiorari to the Supreme Court of Colorado**

## BRIEF OF *AMICUS CURIAE* NAACP LEGAL DEFENSE & EDUCATIONAL FUND, INC. IN SUPPORT OF NEITHER PARTY


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January 18, 2024

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## INTEREST OF *AMICUS CURIAE*[1]

Founded in 1940 by Justice Thurgood Marshall, the NAACP Legal Defense & Educational Fund, Inc. ("LDF") is the nation's first and foremost civil rights law organization. Through litigation, advocacy, public education, and outreach, LDF strives to secure equal justice under the law for all Americans, and to eliminate barriers that prevent Black Americans from realizing their basic civil and human rights. For more than eight decades, LDF has worked to dismantle racial discrimination and achieve the guarantees of equal citizenship that are enshrined in the Fourteenth Amendment to the United States Constitution.

LDF has litigated numerous landmark cases before this Court to enforce the Fourteenth Amendment, including: *Shelley v. Kraemer*, 334 U.S. 1 (1948); *Brown v. Board of Education*, 347 U.S. 483 (1954); and *Cooper v. Aaron*, 358 U.S. 1 (1958); and *Missouri v. Jenkins*, 495 U.S. 33 (1990). LDF has a strong interest in the fair application of the Fourteenth Amendment, which provides important protections for all Americans.

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[1] Pursuant to Supreme Court Rule 37.6, counsel for *Amicus Curiae* state that no counsel for a party authored this brief in whole or in part and that no person other than *Amicus Curiae*, its members, or its counsel made a monetary contribution to the preparation or submission of this brief.

## INTRODUCTION AND SUMMARY OF ARGUMENT

Over 150 years ago, our nation made a binding promise to become a multi-racial democracy through a truly Republican form of government. After enslaving Black Americans for over two centuries, and enduring a Civil War caused by fears among white southerners that the institution of slavery was in jeopardy, the United States finally enacted the Reconstruction Amendments. Those Amendments overturned this Court's notorious ruling that Black Americans have "[n]o rights which the white man was bound to respect," *Dred Scott v. Sandford*, 60 U.S. 393, 407 (1857), and made a constitutional commitment to equal citizenship regardless of race. Their protections were enshrined in the Constitution so that they were preserved not just for a moment in history but for the life of our democracy.

Today, our nation is at a precipice not seen since the Civil War. After former President Trump lost the 2020 election, he engaged in a series of extraordinary efforts to stay in power and repeatedly made false claims that the 2020 election had been stolen by voter fraud. Those claims revealed that, even today, the principle of equal citizenship remains highly contested. President Trump's false claims of voter fraud were targeted at cities with large numbers of Black voters and other voters of color, thereby suggesting that they should not have a full and equal voice in determining the fate of our democracy. On January 6, 2021, a violent mob of the former President's supporters stormed the Capitol of the United States and sought to prevent the peaceful transfer of power, hoisting—for the first time in

history—the Confederate battle flag in the citadel of our democracy. Three years later, former President Trump continues to repeat his false and racially targeted claim that the 2020 election was stolen from him because of voter fraud.

In the decision below, the Colorado Supreme Court determined that former President Trump engaged in an insurrection in connection with the events of January 6, and that, under the Fourteenth Amendment's prohibition on insurrectionists serving again as officers of the United States, he is disqualified from being included on the ballot. This brief does not address whether the Colorado Supreme Court's ultimate determination was correct, and it is submitted on behalf of neither party.

Instead, Amicus submits this brief to defend the Fourteenth Amendment and to urge the Court to fulfill its duty thereunder. That Amendment, along with the Fifteenth Amendment, constitutes our judicially enforceable commitment to a multi-racial democracy. As LDF's Seventh President and Director-Counsel Sherrilyn Ifill has written, it was meant both to "protect Black people against" the belief that they were "meant to be subjugated to the demands of Whites," and to protect "the nation against insurrection, which was understood to constitute an ongoing threat to the future of our country."[2]

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[2] Sherrilyn Ifill, *Why are U.S. courts afraid of the 14th Amendment? Because it's radical.*, Washington Post (Nov. 24, 2023), https://www.washingtonpost.com/opinions/2023/11/24/us-courts-fear-14th-amendment-radical/.

Section 3 of the Fourteenth Amendment clearly establishes the relevant framework for adjudicating this case, and this Court has an unflagging obligation to apply it. Arguments that this Court should not enforce the Fourteenth Amendment here because it is not self-executing, or because this case presents a non-justiciable political question, are not just patently incorrect. Such arguments represent a disturbing effort to circumvent our constitutional commitment to becoming, and remaining, a Republic grounded in the principle that all citizens must have an equal voice in our government.

## ARGUMENT

In adopting the Fourteenth Amendment, the Reconstruction Congress sought to safeguard our newly multi-racial democracy by prohibiting insurrectionists from serving in government. It created a straightforward rule to apply in eligibility challenges such as this one: "No person shall . . . hold any office . . . under the United States" if that person "having previously taken an oath . . . as an officer of the United States . . . to support the Constitution of the United States, shall have engaged in insurrection or rebellion against the same, or given aid or comfort to the enemies thereof." U.S. Const. amend. XIV, § 3.

The plain text of the Fourteenth Amendment could not be clearer in supplying the rule of decision for this case. Yet, some parties and Amici urge the Court to ignore it. They maintain that the Fourteenth Amendment is not self-executing here, or that this case presents a political question beyond this Court's purview. This Court should recognize these arguments for what they are: efforts by those who are

uncomfortable with what the Fourteenth Amendment requires to have this Court disregard it. Those arguments must be soundly rejected. The text of Section 3, its historical context, and this Court's precedents all compel the conclusion that Section 3 is self-executing, and that its application is squarely within this Court's power to decide.

## I. The Reconstruction Amendments Were Born Out of the Civil War and Intended to Ensure the Worst Abuses in Our Nation's History Are Not Repeated.

The Thirteenth, Fourteenth, and Fifteenth Amendments were passed against the backdrop of insurrection and subsequent attempts to come to terms with its consequences. In the wake of the Civil War, the fundamental tasks facing the country were to abolish the sin of slavery, unite a divided citizenry, and enshrine a lasting commitment to a newly multi-racial democracy. Thus, in addition to the abolition of slavery under the Thirteenth Amendment, the Fourteenth and Fifteenth Amendments expressly guarantee a genuinely Republican form of government that is grounded in equal citizenship. U.S. Const. amend. XIII; *id*. at amend. XIV; *id*. at amend. XV.

In December 1865, Congress established the Joint Committee on Reconstruction to study the conditions in the post-Civil War South and investigate the terms under which the seceding states might regain their congressional representation.[3]

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[3] *See The Report of the Joint Committee on Reconstruction* (1866), https://www.let.rug.nl/usa/documents/1851-1875/report-of-the-joint-committee-on-reconstruction-june-20-1866.php.

When leading officers of the Confederacy, including the former Vice President, argued for their re-admission into Congress, the Joint Committee on Reconstruction identified the request as "wholly untenable" given the gravity of what they had done—opening hostilities against the government and only yielding when they were compelled.[4]

There was also a practical concern about how insurrectionists would respect the rights of those whom they did not believe were entitled to rights. Ultimately, Congress resolved this issue by enacting Section 3 of the Fourteenth Amendment. Its purpose was not vengeance, but ensuring a government that was rooted in respect for the political process and all citizens. After the Civil War, states that were governed by insurrectionists immediately enacted Black Codes and refused to suppress anti-Black violence. *See* Eric Foner, *The Second Founding: How the Civil War and Reconstruction Remade the Constitution* 84 (W.W. Norton & Co. 2019). Such events convinced Congress that the egalitarian principles of Section 1 of the Fourteenth Amendment were in danger. *See id.* As Frederick Douglass observed in 1865, the "malignant spirit" of the "traitors" "will not die out in a year" and "will not die out in an age."[5] Thus, "Section 3 was meant to prevent the rebirth of what Republicans called the

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[4] *Id.*

[5] Frederick Douglass, *What the Black Man Wants* (Jan. 26, 1865), https://www.blackpast.org/african-american-history/1865-frederick-douglass-what-black-man-wants/ (quoted by Ifill, *supra*).

Slave Power and help bring into being 'a Union of truly democratic states.'" Foner, *supra*, at 84.

Any idea that Section 3 (or any part of the Fourteenth Amendment) should be confined to the past cannot be countenanced. Republicans in the Reconstruction Congress insisted on constitutional protections for fundamental rights and our governmental institutions to ensure that these enduring guarantees would be insulated from repeal by both Presidential vetoes and shifting political majorities. *See* Eric Foner, *Reconstruction: America's Unfinished Revolution, 1863-1877* 251 (Harper Perennial 1st ed. 1988). They had the wisdom and foresight to provide for the unfortunate circumstance in which such hard-fought and hard-won rights might be jeopardized again in the future.[6]

## II. Section 3 of the Fourteenth Amendment Is Self-Executing and Does Not Present a Nonjusticiable Political Question.

### A. Section 3, Like the Other Substantive Provisions of the Reconstruction Amendments, Is Self-Executing.

As two highly respected constitutional law scholars have explained, by its plain terms, "Section Three's language is language of automatic legal effect" and "is legally self-executing as operative

[6] Indeed, LDF has argued elsewhere that the January 6 insurrection, as well as events preceding and following it, were intended, at least in part, to undermine the voting rights and full citizenship of Black voters in violation of the Fourteenth and Fifteenth Amendments and other federal laws.

constitutional law." William Baude & Michael Stokes Paulsen, *The Sweep and Force of Section Three*, 172 Univ. of Penn. L. Rev. 17 (2024), https://papers.ssrn.com/sol3/papers.cfm?abstract_id=4532751. Section 3 operates whenever its conditions for disqualification are present, without the necessity of any implementing legislation by Congress. *See id.* at 17-18 (explaining that Section 3's phrasing of "'*No person shall be'* directly enacts the officeholding bar") (emphasis in original).

Indeed, the prohibitory language of Section 3 ("No person shall . . .") directly tracks other constitutional rules of disqualification from office. *See* U.S. Const. art. I, § 2, cl. 2 ("No Person shall be a Representative who shall not have attained to the Age of twenty five Years, and been seven Years a Citizen of the United States . . . "); *id.* at § 3, cl. 3 ("No Person shall be a Senator who shall not have attained to the Age of thirty Years, and been nine Years a Citizen of the United States . . . "); *id.* at art. II, § 1, cl. 5 ("No Person except a natural born Citizen, or a Citizen of the United States, at the time of the Adoption of this Constitution, shall be eligible to the Office of President; neither shall any Person be eligible to that Office who shall not have attained to the Age of thirty five Years, and been fourteen Years a Resident within the United States."). Like these other constitutional provisions, "Section Three directly adopts a constitutional rule of disqualification from office," and "[n]one of these disqualifications requires any further legal action or legislation to be operative." Baude & Paulsen, *supra*, at 18.

Consistent with their plain text, this Court has repeatedly, and unequivocally, recognized that the substantive provisions of the Fourteenth Amendment—like those of the Thirteenth and Fifteenth Amendments—are self-executing. As early as the *Civil Rights Cases*, this Court held that the Thirteenth Amendment "as well as the Fourteenth, is undoubtedly self-executing without any ancillary legislation, so far as its terms are applicable to any existing state of circumstances." 109 U.S. 3, 20 (1883). As the Court further explained, the Thirteenth Amendment, "[b]y its own unaided force and effect, [] abolished slavery and established universal freedom." *Id.* A century later, in *City of Boerne v. Flores*, this Court reiterated that the Fourteenth Amendment "like the provisions of the Bill of Rights," is "self-executing." 521 U.S. 507, 522, 524 (1997). Similarly, in interpreting Section 1 of the Fifteenth Amendment, this Court has explained that it "has always been treated as self-executing and has repeatedly been construed, without further legislative specification, to invalidate state voting qualifications or procedures which are discriminatory on their face or in practice." *South Carolina v. Katzenbach*, 383 U.S. 301, 325 (1966); *accord Northwest Austin Mun. Util. Dist. No. One v. Holder*, 557 U.S. 193, 197 (2009) (Fifteenth Amendment confers "self-executing right" to vote).

Opponents of self-execution point to Section 5 of the Fourteenth Amendment, which—like Section 2 of the Thirteenth Amendment and Section 2 of the Fifteenth Amendment—confers on Congress the power to "enforce, by appropriate legislation" the provisions of the Fourteenth Amendment. *See* U.S.

Const. amend. XIII, § 2; amend. XIV, § 5; amend. XV, § 2. But "enacting enforcement legislation [such as the Civil Rights Act of 1866 and the Ku Klux Klan Act of 1871] does not imply that legislation is required. Nor did the enforcement provision in Section Five of the Fourteenth Amendment imply that the other sections were not 'self-executing.'" Gerard N. Magliocca, *Amnesty and Section Three of The Fourteenth Amendment*, 36 Const. Commentary 87, 106 n.101 (2021); Baude & Paulsen, *supra*, at 19 ("[T]he existence of an enforcement power does not mean that the Amendment's specific legal commands lack any independent, self-executing force.").

As this Court explained in *City of Boerne*, the enforcement provisions of the Fourteenth Amendment mean that Congress has the authority, within appropriate limits, to enact legislation that goes beyond the substantive prohibitions of the Fourteenth Amendment to remedy and deter constitutional violations. *See* 521 U.S. at 519–20. But, consistent with basic separation-of-powers principles, the substantive provisions of the Fourteenth Amendment, like "[t]he first eight Amendments to the Constitution set forth self-executing prohibitions," which the Court has the primary authority to interpret. *Id.* at 524.

Nor could there be any principled basis to hold that, while other substantive provisions of the Reconstruction Amendments are self-executing, Section 3 of the Fourteenth Amendment is not. *See* Magliocca, *supra*, at 106 ("Section Three contains the same mandatory language ('No person shall…') as Section One ('No state shall…'), and there is no doubt

that Section One is self-executing."); Myles S. Lynch, *Disloyalty and Disqualification: Reconstructing Section Three of the Fourteenth Amendment*, 30 William & Mary Bill of Rights J. 153, 206–07 (2021), https://scholarship.law.wm.edu/cgi/viewcontent.cgi?article=1992&context=wmborj ("It would be inherently inconsistent to interpret 'No state shall…' as self-executing but 'No person shall…' as requiring enacting legislation.").

In fact, the self-executing nature of Section 3 of the Fourteenth Amendment is even clearer because it speaks directly to Congress's role, which is that Congress may *remove* a disqualification that results from the prohibition on insurrectionists serving as government officials. The first sentence of Section 3 disqualifies a person who has engaged in insurrection or rebellion from holding federal or state office. *See* U.S. Const. amend. XIV, § 3. The second sentence then provides that Congress may "remove such disability" by a vote of two-thirds of each House. *See id.* In *Cawthorn v. Amalfi*, 35 F.4th 245 (4th Cir. 2022), which arose out of an attempt by voters to challenge former Representative Madison Cawthorn's eligibility to run for re-election because of his encouragement of the January 6 insurrection, the Fourth Circuit explained that "the verb 'remove' generally connotes taking away something that has already come into being." *Id.* at 260. In Section 3, the disqualification of insurrectionists "come[s] into being" automatically by direct operation of the Amendment without any further act of Congress. Congress may then remove the disqualification, but only if two-thirds of the members of each House agree.

Finally, those opposed to applying the Fourteenth Amendment here have claimed that even if the Amendment may be a self-executing "shield" as a defense that is not otherwise authorized by law, it cannot be a self-executing "sword" in terms of providing affirmative relief. That purported distinction finds no support in the text or history of the Fourteenth Amendment, or in this Court's precedents. It is at war with the fundamental purpose of Reconstruction and its guarantee of equal citizenship. Indeed, as the Court made clear in the *Civil Rights Cases*, the Thirteenth Amendment plainly provides a "sword" that would allow anyone enduring enslavement to obtain immediate judicial relief. *See* 109 U.S. at 20.

Nor does this case involve a claim for damages. As such, questions about implying a cause of action for damages under the Fourteenth Amendment, *see, e.g.*, *Cale v. City of Covington*, 586 F.2d 311, 317 (4th Cir. 1978), are irrelevant. This case instead falls within the long-settled rule that courts have jurisdiction "'to issue injunctions to protect rights safeguarded by the Constitution,'" and that this power exists "without regard to the particular constitutional provision at issue." *Free Enter. Fund v. Pub. Co. Acct. Oversight Bd.*, 561 U.S. 477, 491 n.2 (2010) (quoting *Bell v. Hood*, 327 U.S. 678, 684 (1946)). Here, consistent with the Supremacy Clause, the Colorado courts properly exercised jurisdiction to consider a federal constitutional issue pursuant to an appropriate state law cause of action.

In sum, Section 3, like all other substantive provisions of the Reconstruction Amendments, is self-executing. As the Colorado Supreme Court correctly

explained, any other interpretation "would lead to absurd results"—results that would undermine our most fundamental values as a constitutional Republic committed to the principle of equal citizenship. *Anderson v. Griswold*, No. 23SA300, 2023 WL 8770111, at *20 (Colo. Dec. 19, 2023). Congress could nullify the Reconstruction Amendments "by simply not passing enacting legislation," and the result would mean that "slavery remains legal," "non-white male voters could be disenfranchised," and "any individual who engaged in insurrection against the government would nonetheless be able to serve in the government, regardless of whether two-thirds of Congress had lifted the disqualification." *Id.* "Surely that was not the drafters' intent." *Id.*

### B. The Insurrectionist Bar in Section 3 Does Not Present a Nonjusticiable Political Question.

Any argument that this case poses a non-justiciable political question likewise has no merit—and indeed, would derogate the role of the courts to ensure the guarantees of the Fourteenth Amendment are fully realized.

In *Zivotofsky v. Clinton*, this Court reiterated that "'[i]t is emphatically the province and duty of the judicial department to say what the law is,'" and "courts cannot avoid their responsibility merely 'because the issues have political implications.'" 566 U.S. 189, 196 (2012) (quoting *Marbury v. Madison*, 5 U.S. 137, 177 (1803) and *INS v. Chadha*, 462 U.S. 919, 943 (1983)). The "narrow exception to that rule" is the "political question" doctrine, which applies only in the rare instances when there is either "a textually

demonstrable constitutional commitment of the issue to a coordinate political department" or "a lack of judicially discoverable and manageable standards" for deciding the issue. *Id.* at 195. As the Colorado Supreme Court correctly held, neither circumstance is present so as to remove the obligation of the courts to apply and enforce the Fourteenth Amendment here.

*First*, the Colorado Supreme Court explained that there is "no constitutional provision that reflects a textually demonstrable commitment to Congress of the authority to assess presidential candidate qualifications." *Anderson*, 2023 WL 8770111, at *23. Although Section Three requires a "vote of two-thirds of each House" to remove an insurrectionist's disqualification from office, "it says nothing about who or which branch should determine disqualification in the first place." *Id.* at *24. "Moreover, if Congress were authorized to decide by a simple majority that a candidate is qualified under Section Three . . . then this would nullify Section Three's supermajority requirement." *Id.*

*Second*, the Court correctly concluded that "interpreting Section Three does not 'turn on standards that defy judicial application,'" but instead simply entails "familiar principles of constitutional interpretation." *Id.* at *26–*27 (quoting *Zivotofsky*, 566 U.S. at 201). Indeed, in a variety of contexts, courts have "readily interpreted" the relevant terms in Section 3 and "have reached the substantive merits of the cases before them." *Id.* As Professors Baude and Paulsen have similarly explained: "Section Three is enforceable by the judiciary as well as by other officials. Section Three's terms embody rules and

standards, enforceable as any other constitutional provision is enforceable." Baude & Paulsen, *supra*, at 125 (emphasis omitted).

Attempts to characterize the application of Section 3 in this case as a political question are misguided efforts to avoid the guarantees of the Fourteenth Amendment altogether. Although the issues in this case are of great import, "[t]here is no freestanding judicial power to abstain from enforcing the Constitution whenever doing so might be difficult or controversial." *Id.*

## III. This Court Has a Constitutional Responsibility to Apply the Fourteenth Amendment and Avoid Repeating Its Gravest Mistakes.

The Reconstruction Amendments were enacted to ensure that the worst abuses in our nation's history are not repeated and to achieve the fullest ideals of our democracy. But those Amendments are effective only when those responsible for applying them have the courage to do so. Unfortunately, for decades after Reconstruction, this Court lacked that courage. In case after case, it disregarded the text and design of the Reconstruction Amendments, allowing our system of government to become a mockery of the multi-racial democracy promised by the Reconstruction Congress. This Court now has the chance to learn from that history, and to ensure that our nation does not replicate the grave mistakes of the late 19th and early 20th centuries. To do so, it must fully and fairly enforce the Fourteenth Amendment by applying the plain text of Section 3 to the facts of this case.

Just as this Court has aptly observed in describing Congress's failures to exercise its Fifteenth Amendment authority in the years after Reconstruction, the first fifty years of this Court's jurisprudence applying the Fourteenth and Fifteenth Amendments "can only be regarded as a failure." *Northwest Austin Mun. Util. Dist.*, 557 U.S. at 197.

In 1876, this Court opened the door to the state-sponsored terrorism against Black Americans that characterized the Jim Crow era by issuing its decision in *United States v. Cruikshank*, 92 U.S. 542 (1876). In that case, the Court overturned federal convictions against white supremacists involved in the Colfax Massacre that followed the 1872 Louisiana gubernatorial election. Central to the Court's reasoning was its failure to apply the Fourteenth Amendment and its incorporation of Bill of Rights protections for the Black people who had been murdered.

Seven years later, the Court compounded its grievous error in *Cruikshank* by invalidating the Force Act of 1871, a federal law enacted to protect Black Americans from racial terrorism, on the ground that it exceeded Congress's authority under the Fourteenth Amendment. *See United States v. Harris*, 106 U.S. 629 (1883). That same year, the Court also upheld Alabama's anti-miscegenation law, notwithstanding its obvious violation of the Fourteenth Amendment. *See Pace v. Alabama*, 106 U.S. 583 (1883).

The Court's derogation of its duty to apply the Fourteenth Amendment culminated 13 years later in *Plessy v. Ferguson*, 163 U.S. 537 (1896).

Notwithstanding the Fourteenth Amendment's unequivocal guarantee of "equal protection of the laws," the *Plessy* Court permitted our nation to perpetuate—by law—a racial caste system. In so doing, the Court sought to justify its disregard of the Fourteenth Amendment by blaming the victims of that racial caste system for its harms, writing that the injuries to Black Americans caused by racial exclusion occurred "solely because the colored race chooses to put that construction upon it." *Id.* at 551.

Shortly after *Plessy*, in *Williams v. Mississippi*, 170 U.S. 213 (1898), the Court upheld Mississippi's poll tax and other barriers intended to disenfranchise Black voters, recognizing that such restrictions made discrimination possible but holding they did not violate the Fourteenth Amendment because they were facially neutral. Five years later, in *Giles v. Harris*, 189 U.S. 475 (1903), the Court similarly upheld Alabama's discriminatory voting qualifications under the Fourteenth and Fifteenth Amendments because the law was facially neutral, notwithstanding their overtly discriminatory intent and extreme discriminatory impact. In another notorious part of its opinion, the *Giles* Court suggested it was not for the Court to act if the "mass of the white population intends to keep" Black people from voting. *Id.* at 488. Instead, according to the *Giles* Court, relief from such "a great political wrong, if done, as alleged, by the people of a state and the state itself, must be given by them or by the legislative and political department of the government of the United States." *Id.*

In all of these cases, and in many others during this era, the Court abdicated its solemn responsibility to apply the Constitution. The detrimental consequences cannot be overstated. As Professor Ifill has explained, such cases "effectively derailed our democracy's promise after Reconstruction and until the mid-20th century." Ifill, *supra*.

Today, this ignominious chapter from the Court's own history highlights the importance of applying the Reconstruction Amendments fully and fairly, as well as the dangers of declining to do so. The guarantees of the Fourteenth Amendment are all integral to realizing our nation's lasting commitment to a Republican form of government grounded in equal citizenship. This Amendment is as vital today to the operation of the Constitution as it was when it was ratified over 150 years ago. And it must be enforced to ensure "equal justice under law" as inscribed on the edifice of the Supreme Court.

The provisions of the Constitution cannot be disregarded or deemed unenforceable without undermining the force of the Constitution itself. This applies no less to Section 3's ban on insurrectionists serving again as officers of the United States.

## CONCLUSION

*Amicus Curiae* NAACP Legal Defense & Educational Fund, Inc. respectfully urges the Court to honor its responsibility to the Fourteenth Amendment, which is fundamental to the structure and viability of our multi-racial democracy. For the Court to do so, it must decide this case by fairly applying the clear rule set forth in Section 3 of that Amendment, regardless of the political implications.

Respectfully submitted,

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January 18, 2024