No. 24-258

In the Supreme Court of the United States

LINDSEY GREMONT, ET AL.,

Petitioners,

v.

JANE NELSON, ET AL.,

Respondents.

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

BRIEF OF AMICI CURIAE TERPSEHORE "TORE" MARAS AND ELIGIBLE VOTERS OF ALL 50 STATES AND 1 TERRITORY IN SUPPORT OF PETITIONERS

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INTEREST OF THE AMICI CURIAE[1]

Amici curiae consist of 2,580 citizens from across the United States and one U.S. territory, who, in support of the Petitioners, respectfully now bring to this Court's attention how and why the continued overbroad application of the "generalized grievance" doctrine in election cases improperly denies standing to numerous persons, including the dismissal of many cases previously brought by Amici.

SUMMARY OF THE ARGUMENT

As with nearly all other election integrity lawsuits that have been filed across the country in recent years, Petitioners were prohibited from exercising their First Amendment right to petition the government for redress of their grievances given their claims were considered too "generalized" for adjudication. In ruling that Petitioners lack Article III standing,[2] the Fifth

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[1] In accordance with Rule 37.6, no counsel for a 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. No person other than Amici Curiae or its counsel made a monetary contribution to its preparation or submission. All parties were informed of the intent to file at least 10 days in advance.

[2] Federal jurisdiction requires that a plaintiff establish that (1) she has suffered an "injury in fact" which is "concrete and particularized," and "actual or imminent," not conjectural or hypothetical; (2) a causal connection between the injury complained of, which must be fairly traceable to the challenged action of the

Circuit applied the "generalized grievance" doctrine[3] as a blunt object killing any hope of governmental election reform – begging the question: How can voters ever achieve election reform when the process itself for such reform, namely the election of First and Second Branch reformers, has become diseased and yet the Third Branch refuses to intercede with a cure?

On the one hand, the executive and legislative branches of state and federal government are tasked with enacting and enforcing applicable law – including election law, on the other hand those same branches refuse to address demonstrated instances of deficiencies within the election process. Despite this unique incongruity found in election cases, courts today have broadly extended the general grievance doctrine to election cases, in part, relying on predecessor Courts finding that "the undifferentiated public interest in executive officers' compliance with the law" improperly collides with "the Chief Executive's most important constitutional duty, to 'take Care that the Laws be faithfully executed,' Art. II, § 3". *Lujan*, *supra*, 504 U.S. at 577.

In other words, *Lujan* and numerous other cases have rightly reinforced the important gatekeeping function of the doctrine by stressing the Third Branch

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defendant; and (3) a likelihood that the injury will be "redressed by a favorable decision." *Lujan v. Defenders of Wildlife*, 504 U.S. 555, 560–61 (1992) (citations amended).

[3] The generalized grievance doctrine allows federal courts to refuse hearing "generalized grievances" because they pose "abstract questions of wide public significance . . . pervasively shared and most appropriately addressed in the representative branches." *Valley Forge Christian Coll. v. Ams. United for Separation of Church & State, Inc.*, 454 U.S. 464, 474-75 (1982) (citation and internal quotation marks omitted).

cannot adjudicate mere political disputes. No matter the label placed on a case – as the one now before this Court, the overbroad application of the generalized grievance doctrine ***in election cases*** disregards concrete individualized voter harm and should respectfully now be curtailed despite the fact similar particularized harms are widespread and of wide public significance.

Over the past several years, voters have alleged in well-pled filings that their votes were nullified or diluted through willful irregularities in the 2020 election process; however, as with the Fifth Circuit in the instant matter, those cases were dismissed under a broad application of the generalized grievance doctrine.

The Court now has an opportunity to reign in the overly broad application of the generalized grievance doctrine in election cases. A useful doctrine borne from the need to constitutionally limit court access to actual cases and controversies has metastasized into an overreaching gatekeeper role barring legitimate cases simply because many others can bring similar cases. The undiluted right of the people to seek redress of governmental grievances, as required by the First Amendment to the United States Constitution,[4] has no such limiting language.

Amici curiae respectfully submit that the generalized grievance doctrine was improperly applied here in a way that denies Petitioners as well as the 2,580 parties to this amici brief the ability to seek recourse from the courts when their right to vote – an acknow-

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[4] The First Amendment to the United States Constitution protects "the right of the people . . . to petition the Government for a redress of grievances." U.S. Const. amend. I.

ledged fundamental right – has simply been called into question. It is respectfully incumbent on the Court to course-correct this overextension of the generalized grievance doctrine in election cases.

ARGUMENT

I. THE ABILITY TO PROPERLY VOTE IN A FREE AND FAIR ELECTION IS A CONSTITUTIONAL RIGHT, AND PETITIONERS SUSTAINED A CONCRETE HARM WHEN THEY WERE DENIED THAT RIGHT.

The right to properly vote is not a mere privilege, but a fundamental constitutional right. As recognized by this Court, "the right to vote as the legislature has prescribed is fundamental," and that right extends far beyond "the initial allocation of the franchise." *Bush v. Gore,* 531 U.S. 98, 104 (2000). When voters allege that their votes have been diluted or nullified due to known defective electoral processes, they assert a specific constitutional injury and not merely a downgraded "generalized grievance" simply because many others suffer a similar harm. Indeed, voting is the purest form of political expression – a fundamental communicative expression like no other for the conveyance of political opinions.

As the First Amendment safeguards verbal, written, and symbolic communications, voting provides the undiluted expression of political beliefs. Being able to properly cast a ballot is a direct form of individual political expression – no different than any other form of symbolic political speech such as wearing an armband

or burning a flag – both of which are currently protected under the First Amendment.[5]

So strong is the First Amendment protections afforded political speech, "[t]his Court has recognized only one permissible ground for restricting political speech: the prevention of "quid pro quo" corruption or its appearance." *Federal Election Com'n v. Cruz*, 596 U.S. 289, 142 S.Ct. 1638, 1652 (2022). The Court recounts in *Cruz*:

> We have consistently rejected attempts to restrict campaign speech based on other legislative aims. For example, we have denied attempts to reduce the amount of money in politics; to level electoral opportunities by equalizing candidate resources; and to limit the general influence a contributor may have over an elected official. However well-intentioned such proposals may be, ***the First Amendment – as this Court has repeatedly emphasized – prohibits such attempts to tamper with the "right of citizens to choose who shall govern them."***

Id. (internal citations omitted) (emphasis added).

The Fifth Circuit's instantiation of the "generalized grievance" doctrine irreconcilably demotes the actual vote pertaining to political speech below the political speech itself. Our case law would be scoured in vain for a more pronounced judicially-created tail wagging the dog.

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[5] *See e.g.*, *Tinker v. Des Moines Independent Community School District*, 393 U.S. 503 (1969) and *Texas v. Johnson*, 491 U.S. 397 (1989).

The current aggressive frontal assault on those who challenge known defective voting systems impacts another First Amendment right, namely the right to associate with others to advance one's political beliefs. *See Cal. Democratic Party v. Jones*, 530 U.S. 567, 574 (2000) ("Representative democracy in any populous unit of governance is unimaginable without the ability of citizens to band together in promoting among the electorate candidates who espouse their political views. The formation of national political parties was almost concurrent with the formation of the Republic itself. Consistent with this tradition, the Court has recognized that the First Amendment protects "the freedom to join together in furtherance of common political beliefs," which "necessarily presupposes the freedom to identify the people who constitute the association, and to limit the association to those people only"). By casting their votes in federal elections, Petitioners aligned with a political party and immediately gained the First Amendment protection to associate freely for political purposes. Infringing on their votes adversely impacts how such association progresses. In other words, if one's vote is disconnected from one's political party the association between the two becomes necessarily diminished and political speech is eroded.

Moreover, even though "the immediate concern of the [Fifteenth] Amendment was to guarantee to the emancipated slaves the right to vote," this Court has acknowledged the Fifteenth Amendment[6] "is cast in fundamental terms, terms transcending the particular

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[6] Under the Fifteenth Amendment, sec. 1: "The right of citizens of the United States to vote shall not be denied or abridged by the United States or by any State on account of race, color, or previous condition of servitude." U.S. Const., Amend. XV, § 1.

controversy," and "grants protection to all persons, not just members of a particular race." *Rice v. Cayetano*, 528 U.S. 495, 512 (2000).

And finally, the Ninth Amendment to the United States Constitution also safeguards the right to properly vote in a free and fair election. More specifically, the Ninth Amendment protects the fundamental right to have one's actual vote counted and that right cannot be usurped based on governmental inaction any more than it can by governmental action. U.S. Const., amend. IX ("The enumeration in the Constitution, of certain rights, shall not be construed to deny or disparage others retained by the people.").

While the seldom-litigated Ninth Amendment has largely been relegated to the status of a "saving clause" or rule of construction, it remains as worthy of respect as any other Constitutional provision. *See Richmond Newspapers v. Virginia*, 448 U.S. 555, 579, n.15 (1980):

> Madison's comments in Congress also reveal the perceived need for some sort of constitutional "saving clause," which, among other things, would serve to foreclose application to the Bill of Rights of the maxim that the affirmation of particular rights implies a negation of those not expressly defined. Madison's efforts, culminating in the Ninth Amendment, served to allay the fears of those who were concerned that expressing certain guarantees could be read as excluding others. (internal citations omitted).

See also Charles v. Brown, 495 F. Supp. 862, 863-64 (N.D.Ala.1980) (The Ninth Amendment "was added to the Bill of Rights to ensure that the maxim *expressio*

unius est exclusio alterius would not be used at a later time to deny fundamental rights merely because they were not specifically enumerated in the Constitution.").

As with many other courts across the country, the Fifth Circuit here mischaracterized Petitioners' complaint challenging the use of a known vulnerable election process as merely a generalized harm. This result fails to recognize that the generalized "right to vote" is one step removed from the "right to have one's own vote properly counted" – a highly particularized harm belonging only to one person.

The above Constitutional keys in unison unlock Petitioners' standing rights fully derived from an injury to one of the most important personal interests one could have – Petitioners' right to have their respective votes accurately counted. *See Reynolds v. Sims*, 377 U.S. 533, 554 (1964) ("It has been repeatedly recognized that all qualified voters have a constitutionally protected right to vote, and to have their votes counted (emphasis added) (citations omitted); *Gray v. Sanders*, 372 U.S. 368, 380 (1963) ("Every voter's vote is entitled to be counted once. It must be correctly counted and reported.") (emphasis added); *United States v. Classic*, 313 U.S. 299, 315 (1941) ("Obviously included within the right to choose, secured by the Constitution, is the right of qualified voters within a state to cast their ballots and have them counted at Congressional elections.") (emphasis added).

Petitioners' constitutional injuries doubly manifested after those elected to office fought to deny them entry to the only place where they could redress their inability to properly vote in a free and fair election – a court room where a Judge could review evidence and adjudicate claims. *See Stewart v. Blackwell*, 444 F.3d

843, 855 (6th Cir. 2006) (The Sixth Circuit found standing for plaintiffs challenge to election machines because "the increased probability that [plaintiffs'] votes will be improperly counted based on punch-card and central-count optical scan technology is neither speculative nor remote"), *vacated by* 473 F.3d 692 (6th Cir. 2007) (subsequently vacating appeal as moot after state's abandonment of election machines). *See also Banfield v. Cortes*, 110 A.3d 155, 161 (Pa. Sup. Ct. 2015) (allowing discovery in direct-recording electronic voting system case) ("In the discovery phase of trial, the parties obtained reports and deposition testimony from expert witnesses who reviewed the Secretary's examination reports. Appellants retained two experts, Dr. Douglas Jones, Ph.D., and Dr. Daniel Lopresti, Ph.D., who contended that the certified DREs do not meet several requirements of the Election Code and the Secretary's certification process is inadequate to determine whether electronic voting systems meet accuracy, security and reliability requirements.").

II. THE GENERALIZED GRIEVANCE DOCTRINE HAS BEEN IMPROPERLY APPLIED IN ELECTION INTEGRITY MATTERS.

While standing requirements are essential to the proper working of the federal courts, the overbroad application of the generalized grievance doctrine in cases involving election constitutional claims has become a bridge too far. Voters who assert individualized claims based on the discarding of their own individual votes due to ignored election failings present concrete injuries deserving of judicial review despite the fact others have sustained similar claims.

When evaluating Article III standing, injury-in-fact "is one of degree, not discernible by any precise test."

Babbitt v. United Farm Workers Nat'l Union, 442 U.S. 289, 297 (1979). As explained by this Court, "[f]or purposes of ruling on a motion to dismiss for want of standing, both the trial and reviewing courts must accept as true all material allegations of the complaint." *Metropolitan Washington Airports Authority v. Citizens For the Abatement of Aircraft Noise, Inc.*, 501 U.S. 252, 111 S.Ct. 2298, 115 L.Ed.2d 236 (1991) (*citing Warth v. Seldin*, 422 U.S. 490, 501, 95 S.Ct. 2197, 2206, 45 L.Ed.2d 343 (1975)).

Petitioners are not asking for the Court to do anything that dramatic by way of their Petition – only the curtailing of a doctrine that has been improperly overextended.[7] This Court has already found that an

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[7] *See* Appendix 2, a non-exhaustive listing of election-related cases adjudicated by the judicial branch (Third Branch) and recent legislation and statutes promulgated by the legislative branches (First Branch) and executed by the executive branch (Second Branch) impacting voter rights.

The courts' over-reliance on the generalized grievance doctrine has not only blocked citizens' ability to bring forth legitimate constitutional claims but has also eroded fundamental First Amendment rights. By dismissing cases on the basis that they constitute generalized grievances, courts have effectively barred citizens from fully exercising their right to vote and to petition the government for redress of grievances. The alternative avenues that remain—heavily dependent on state legislatures—have further eroded transparency and public oversight of both federal and state elections. The actions taken by the judicial branch have emboldened state legislatures to enact laws that curtail recounts, obscure election processes, and insulate elections from meaningful public scrutiny.

Despite some officials' efforts to address election integrity, such as Texas Attorney General Ken Paxton's challenge to legislative restrictions, there remains a continuous struggle to ensure free, fair, and transparent elections. Speaking of this issue, Attorney General

Article III injury-in-fact exists for voters subjected to a defective election process.

In *Coleman v. Miller*, 307 U.S. 433, 438 (1939), petitioning senators alleged ***their votes*** were improperly overridden and had standing because they had a "plain, direct and adequate interest in maintaining the effectiveness of their votes." *Id.* In finding adequate standing, the Court reasoned that the senators "set up and claimed a right and privilege under the Constitution of the United States to have their votes given effect, and the state court . . . denied that right and privilege." *Id.*

In *Federal Election Com'n v. Akins*, 524 U.S. 11 (1998), the Court recognized that "[o]ften the fact that

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Paxton explained, "Blocking our ability to investigate certain election crimes would have been a serious disruption to the electoral landscape with only a month left before Election Day. Texas must be allowed to protect its elections from ballot harvesting schemes. The Fifth Circuit has now temporarily stayed the ruling that would have blocked my ability to conduct these investigations, and I will continue to use every tool available to secure our elections." *See* "Attorney General Ken Paxton Temporarily Stops Injunction That Blocked Texas Election Integrity Law and Investigations Into Vote Harvesting Schemes", Office of the Attorney General of Texas, October 4, 2024 (available at https://www.texasattorneygeneral.gov/news/releases/attorney-general-ken-paxton-temporarily-stops-injunction-blocked-texas-election-integrity-law-and). This statement underscores the pressing need for judicial recognition of these constitutional violations, vital for safeguarding electoral justice.

The widespread use of the general grievance doctrine by courts has systematically dismissed claims tied to constitutional rights, notably voting. This trend compels individuals to return to state systems, which often have barriers to accessing or challenging election procedures. In states like Michigan, new laws limit recounts and fraud allegations, exacerbating the issue. *See* Appendix 2.

an interest is abstract and the fact that it is widely shared go hand in hand. But their association is not invariable, and where a harm is concrete, though widely shared, the Court has found 'injury in fact.'" *Id.* at 24 (emphasis added). In that case, a refusal to turn over information related to the American Israel Public Affairs Committee pursuant to the Federal Election Campaign Act of 1971 ("FECA"), 2 U.S.C. § 431(4), allegedly violated respondents' individualized rights. As the Court explains,

> [Plaintiffs'] inability to obtain information that, they claim, [is required to be made public] meets the genuine "injury-in-fact" requirement that helps assure that the court will adjudicate "[a] concrete, living contest between adversaries." *Coleman v. Miller,* 307 U.S. 433, 460 (Frankfurter, J., dissenting). *United States v. Richardson*, 418 U.S. 166 (1974), distinguished. The fact that the harm at issue is widely shared does not deprive Congress of constitutional power to authorize its vindication in the federal courts where the harm is concrete. *See Public Citizen v. Department of Justice*, 491 U.S. 440, 449-450 (1989). The informational injury here, directly related to voting, the most basic of political rights, is sufficiently concrete and specific such that the fact that it is widely shared does not deprive Congress of constitutional power to authorize its vindication in the federal courts.

524 U.S. at 24-25 (emphasis added).

Despite FECA giving rise to the underlying action in *Akins*, that does not detract from the Court recognizing "the fact that a political forum may be more

readily available where an injury is widely shared (while counseling against, say, interpreting a statute as conferring standing) does not, by itself, automatically disqualify an interest for Article III purposes." *Id*. at 24. More to the point, the Court found that "conclusion seems particularly obvious where (to use a hypothetical example) large numbers of individuals suffer the same common-law injury (say, a widespread mass tort), or where large numbers of voters suffer interference with voting rights conferred by law." *Id*. (emphasis added).

Similarly, in *Baker v. Carr*, 369 U.S. 186, 206 (1962), the Court found that Tennessee voters could challenge the state's legislative apportionment of voting districts and that, contrary to the state's assertion, the generalized grievance doctrine did not deny the voters' standing because, even though everyone in the state was affected by the apportionment, the voters articulated a specific injury – the dilution of their own votes.

In a more recent case, *Bush, supra*, 531 U.S. at 105, this Court reaffirmed: "It must be remembered that 'the right of suffrage can be denied by a debasement or dilution of the weight of a citizen's vote just as effectively as by wholly prohibiting the free exercise of the franchise.' *Reynolds, supra* at 555."

In *Gill v. Whitford*, 138 S.Ct. 1916 (2018), the Court found as a basic proposition, "voters who allege facts showing disadvantage to themselves as individuals have standing to sue" to remedy that disadvantage. *Gill*, 138 S.Ct. at 1929 (*citing Baker v. Carr*, *supra*). When the Court in *Gill* addressed election standing issues, namely whether a voter can properly seek judicial redress for allegations of individual harm, it

opened the door for lower court judicial review even when standing was not apparent from the initial pleadings – a baseline approach not even addressed by the Fifth Circuit.

More specifically, the Court ruled in *Gill* that a lack of standing typically demands dismissal of the action but,

> [h]ere, however, where the case concerns an unsettled kind of claim that the Court has not agreed upon, the contours and justiciability of which are unresolved, the case is remanded to the District Court to give the plaintiffs an opportunity to prove concrete and particularized injuries using evidence that would tend to demonstrate a burden on their individual votes.

Id. at 1922 (emphasis added).

Petitioners never had the opportunity to demonstrate how their votes were burdened by a demonstrably defective voting system. If vulnerable voting machines have demonstrable flaws in counting votes, such facts demonstrate Petitioners' individual harm, namely the potential that their votes could not or would not be properly counted. More to the point, so long as the government officials who address such matters retain office because of these infirmities, the only avenue for relief is by way of our judiciary.

III. THE APPLICATION OF THE GENERALIZED GRIEVANCE DOCTRINE IN ELECTION INTEGRITY CASES VIOLATES THE FIRST AMENDMENT RIGHT TO PETITION THE GOVERNMENT FOR A REDRESS OF GRIEVANCES.

When the Supreme Court's above standing jurisprudence is appropriately reconciled and read in context, the generalized grievance doctrine does not bar the instant matter. Indeed, the misapplication of this doctrine by federal courts with election complaints such as Petitioners' fairly begs for this Court's intervention. When the political branches of government act contrary to the will of their constituents, the people only have recourse through the ballot box. When that ballot box becomes the source of injury and the First and Second Branches fail to resolve the conflict, it is incumbent on the Third Branch to respectfully step in and address those grievances as guaranteed by the First Amendment – especially when these other branches have shown such scorn for the First Amendment as applied to election matters. *See e.g.*, *Missouri v. Biden*, 83 F. 4th 350, 365 (5th Cir. 2023) ("CISA's role went beyond mere information sharing. Like the CDC for COVID-related claims, CISA told the platforms whether certain election-related claims were true or false. CISA's actions apparently led to moderation policies being altered and content being removed or demoted by the recipient platforms.").

Shining a further spotlight on how standing has been inconsistently applied in an election context, federal courts readily allow standing for special interest groups in election matters while the registered voters supposedly benefiting from such efforts are afforded no such courtesy. *See e.g.*, *Vote.Org v. Callanen*, No.

22-50536, 2023 WL 8664636, (5th Cir. Dec. 15, 2023) (granting Vote.org, a non-voter, organizational standing to lodge a Voting Rights Act materiality provision challenge to Texas election law because the law allegedly frustrated use of Vote.org's smartphone app); *Curling v. Raffensperger*, 50 F.4th 1114, 1121 (11th Cir. 2022) (holding that the Coalition for Good Governance, a purported voter advocacy organization, had standing to challenge election machines under a diversion theory because the state's use of Dominion ImageCast X ballot-marking devices constituted "a policy [that would] force the [Coalition] to divert personnel and time to educating volunteers and voters and to resolving problems that the policy presents on election day); *Public Interest Legal Foundation v. Benson*, 1:2021-cv-00929-JMB (ECF 35) (W.D. Mich. Aug. 25, 2022) (granting organizational standing to litigate alleged violations of the National Voter Registration Act by the state of Michigan because the plaintiff organization alleged that the state's conduct impaired its purported "essential and core mission of fostering compliance with federal election laws and promoting election integrity" as well as the allegation that it "has suffered and continues to suffer pecuniary injury because PILF diverted resources that could have been expended in other states to address Michigan's alleged voter roll deficiencies"); *Judicial Watch, Inc. v. Griswold*, 554 F.Supp.3d 1091, 1104-1105 (D. Colo. Aug. 16, 2021) (granting Judicial Watch associational standing to litigate alleged violations of the National Voter Registration Act by Colorado without needing to establish specific injuries by actual people reasoning that its members would benefit from resolution of the claims because the organization's purported mission includes the abstract principle of

ensuring "fidelity to the rule of law"); *Democratic Party of Ga., Inc. v. Raffensperger*, 1:19-cv-05028-WMR (ECF 56) (N.D. Ga. Mar. 6, 2020) (approving a settlement agreement that changed Georgia's absentee voting procedures because the Democratic Party alleged that the state's laws and procedures generally violated voters' constitutional rights).

In other words, powerful corporations and entities with massive political influence, sufficiently manifest injuries-in-fact so that federal courts can enact these plaintiffs' preferred voting policies, using "voter rights" pretexts that "seem[] to have been contrived", *Dept. of Commerce v. New York*, 139 S.Ct. 2551, 2575 (2019), while actual voters are left outside the courthouse steps wondering why they cannot enforce their actual proper votes.

Despite the fact we are in a new era of largely untested and ever-evolving electronic voting machines, today's courts in election cases often create the impression it is well-settled voters lack standing to challenge the constitutionality of using these new voting procedures and demonstrably defective electronic voting machines. Petitioners seek to vindicate their individual rights and the fact that the outcome of this matter would incidentally affect the rights of many others does not *ipse dixit* render Petitioners' complaint a mere "generalized grievance" unworthy of judicial review.

The Petition should respectfully be granted given courts today in election cases often confuse subject matter jurisdiction with merits determinations, improperly conflating them at the motion to dismiss stage. *See generally*, Steven J. Mulroy, *Baby & Bathwater: Standing in Election Cases After 2020*, 126 DICK. L. REV. 9 (2021). To be sure, "pleadings must be something

more than an ingenious academic exercise in the conceivable". *United States v. SCRAP*, 412 U.S. 669, 688 (1973). Nevertheless, just because a legal theory follows an "attenuated line of causation" does not render the resulting injury any less concrete. When faced with novel Constitutional issues such as those presented here, the merits of the matter must be further examined with discovery taking place rather than being dismissed outright. *Gill*, 138 S.Ct. at 1922.

Petitioners want the same opportunity to present their case afforded a well-funded special interest group that does not even vote. They also want the same standard applied to their individualized voting harm as afforded their political speech regarding their voting. There should not be any additional barriers erected preventing adjudication of Petitioners' injuries. Given numerous recent overextensions of the generalized grievance doctrine in election cases, the Court should respectfully clarify the doctrine when applied to those cases providing well-pled election deficiencies and resulting harm caused by those deficiencies.

CONCLUSION

While our government is built on the balance of three branches, the strength of our republic depends on each one safeguarding the rights of the people. Even if the executive and legislative branches falter in their duties, our democracy can still endure if the judiciary stands as a steadfast guardian of justice. Now, more than ever, we turn to this Court to uphold the principles of justice and ensure that no branch of government,

emboldened by unchecked authority, encroaches upon the freedoms guaranteed to every one of us.

For the foregoing reasons, amici curiae respectfully request that this Court grant Petitioners' petition for writ of certiorari and summarily reverse the decision of the United States Court of Appeals for the Fifth Circuit. In so doing, this Court will ensure that the generalized grievance doctrine is not applied in an overly broad manner that violates Constitutional rights, including improperly depriving Petitioners of their First Amendment right to petition the government for redress of their well-pled particularized grievances.

Respectfully submitted,

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