

No. 24-37

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**In the Supreme Court of the United States**

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LORENZO GAROD PIERRE, PETITIONER

*v.*

UNITED STATES OF AMERICA

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*ON PETITION FOR A WRIT OF CERTIORARI  
TO THE UNITED STATES COURT OF APPEALS  
FOR THE ELEVENTH CIRCUIT*

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**MEMORANDUM FOR THE UNITED STATES**

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Petitioner contends (Pet. 5-19) that 18 U.S.C. 922(g)(1), the federal statute that prohibits a person from possessing a firearm if he has been convicted of “a crime punishable by imprisonment for a term exceeding one year,” *ibid.*, violates the Second Amendment. In *United States v. Rahimi*, 144 S. Ct. 1889 (2024), this Court clarified the methodology for determining whether a firearms regulation complies with the Second Amendment. After issuing that decision, the Court granted certiorari in multiple cases presenting the question whether Section 922(g)(1) violates the Second Amendment, vacated the decisions below, and remanded for further consideration in light of *Rahimi*. See *Garland v. Range*, No. 23-374, 2024 WL 3259661 (July 2, 2024); *Vincent v. Garland*, No. 23-683, 2024 WL 3259668 (July 2, 2024); *Jackson v. United States*, No. 23-6170, 2024 WL 3259675 (July 2, 2024); *Cunningham v. United States*, No. 23-6602, 2024 WL 3259687 (July 2, 2024); *Doss v. United States*, No. 23-6842, 2024 WL

3259684 (July 2, 2024). Consistent with that practice, the Court should grant the petition for a writ of certiorari in this case, vacate the court of appeals' judgment, and remand for further consideration in light of *Rahimi*.\*

Respectfully submitted.

ELIZABETH B. PRELOGAR  
*Solicitor General*

SEPTEMBER 2024

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\* The government waives any further response to this petition for a writ of certiorari unless this Court requests otherwise.