UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF FLORIDA
TALLAHASSEE DIVISION

LEAGUE OF WOMEN VOTERS OF FLORIDA, INC., et al.,

Plaintiffs,

v.

LAUREL M. LEE, in her official capacity as Florida Secretary of State, et al.,

Defendants,

and

REPUBLICAN NATIONAL COMMITTEE, and NATIONAL REPUBLICAN SENATORIAL COMMITTEE,

Intervenor-Defendants.

Cases Consolidated for Trial:

Nos.: 4:21-cv-186-MW/MAF
4:21-cv-187-MW/MAF
4:21-cv-201-MW/MAF
4:21-cv-242-MW/MAF

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PLAINTIFFS' JOINT BRIEF IN RESPONSE TO COURT'S ORDER REQUESTING BRIEFING ON SPECIFIC QUESTIONS RELATING TO THE *ANDERSON-BURDICK* ANALYSIS

Pursuant to the Court's February 16 Order for Supplemental Briefing, ECF No. 630, Plaintiffs in the above-captioned consolidated cases respond to the Court's questions as follows:

<u>COURT'S QUESTION 1</u>: If "partisan considerations are not entirely off limits in election administration," when are they acceptable and when are they off limits?

Under *Crawford*, partisan motivations per se do not invalidate a challenged election law, but they also cannot provide the basis or justification to defeat such a challenge. Thus, if partisan "considerations [provide] the only justification for" a challenged law, such a law "would suffer the same fate as the poll tax at issue in *Harper*"—that is, it would be held unconstitutional. *Crawford v. Marion Cnty. Election Bd.*, 553 U.S. 181, 203 (2008) (controlling op.). "But if a nondiscriminatory law is supported by valid neutral justifications, those justifications should not be disregarded simply because partisan interests may have provided one motivation for the votes of individual legislators." *Id.* at 204. In other words, in assessing whether a law's burden on voting rights is "*justified* by relevant and legitimate state interests 'sufficiently weighty to justify the limitation,'" *id.* at 191 (quoting *Norman v. Reed*, 502 U.S. 279, 288-89 (1992)) (emphasis added), the Court must disregard partisan interests because they are not legitimate state interests. *See id.* at 203.

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That does not mean that the existence of partisan interests is entirely irrelevant to the analysis. While sufficient neutral justifications were found for the specific statute challenged in *Crawford*, it remains the case that evidence of partisan motivations can help explain why a legislature would have passed a law that lacks neutral benefits. Such evidence thus may tend to negate an inference that the

legislature would not have passed an unjustified and unneeded law. A legislative focus on partisan interests also provides at least circumstantial evidence of partisan effects, the subject of the Court's next question. *Cf. United States v. Rodriguez-Lopez*, 565 F.3d 312, 315 (6th Cir. 2009) ("The fact that Rodriguez received ten successive solicitations for heroin is probative circumstantial evidence of his involvement in a conspiracy to distribute heroin.").

Moreover, pursuing partisan interests provides no justification for race discrimination. "[I]ntentionally targeting a particular race's access to the franchise because its members vote for a particular party, in a predictable manner, constitutes discriminatory purpose." *N.C. State Conf. of the NAACP v. McCrory*, 831 F.3d 204, 222 (4th Cir. 2016); *see also Cooper v. Harris*, 137 S. Ct. 1455, 1464 n.1, 1473 n.7 (2017); *Veasey v. Abbott*, 830 F.3d 216, 241 n.30 (5th Cir. 2016) (en banc) ("[I]ntentions to achieve partisan gain and to racially discriminate are not mutually exclusive," so "acting to preserve legislative power in a partisan manner can also be impermissibly discriminatory").

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<u>COURT'S QUESTION 2</u>: If partisan intent does not make a law discriminatory, do partisan effects? For example, in *Tashjian v. Republican Party of Connecticut*, the Supreme Court applied *Anderson* to invalidate a facially neutral law that burdened the Connecticut Republican Party's associational rights. 479 U.S. 208, 217 (1986); *see also Libertarian Party of Ala. v. Merrill*, No. 20-13356, 2021 WL 5407456, at *4 (11th Cir. Nov. 19, 2021) (evaluating first whether Alabama's voter list law "expressly discriminates against minor political parties" and then evaluating whether the law is "discriminatory in practice"). How do these cases apply here?

Partisan effects are relevant because a law with disparate partisan effects is not a "reasonable, nondiscriminatory restriction" and thus requires a heightened justification under *Anderson-Burdick*. As the Eleventh Circuit explained in *Swanson v. Worley*, 490 F.3d 894, 907 (11th Cir. 2007), a law that "placed independent candidates at a relative disadvantage to major party candidates" constituted "discrimination against independent candidates" and was *for that reason* "a severe burden because '[a] burden that falls unequally on new or small political parties or on independent candidates impinges, by its very nature, on associational choices protected by the First Amendment.'" *Id.* (quoting *Anderson v. Celebrezze*, 460 U.S. 780, 793-94 (1983)). Consequently, the fact that SB 90 burdens Democratic voters more heavily than Republican voters demands a heightened justification for the law. Plaintiffs address the application of this principle to the evidence in this case in their post-trial briefing.

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COURT'S QUESTION 3: Does a law's ability to achieve its stated objectives factor into the *Anderson-Burdick* framework? Is this question (i) subsumed by analyzing whether a law "is supported by valid neutral justifications," *Crawford*, 553 U.S. at 204, (ii) a separate question, or (iii) wholly absent from the *Anderson-Burdick* inquiry?

Yes, a law's ability to achieve its stated objectives is significant to the *Anderson-Burdick* framework. That question forms one part of analyzing whether the law is supported by valid neutral justifications. Specifically, "in passing judgment" on the State's asserted interests for a law, "the Court must not only

determine the legitimacy and strength of each of those interests; it also must consider the extent to which those interests make it necessary to burden the plaintiff's rights." *Anderson v. Celebrezze*, 460 U.S. 780, 789 (1983). If a law does not achieve its stated objectives, then the burdens it imposes are not necessary to serve those objectives and those asserted interests cannot serve to validate the law under *Anderson-Burdick*.

COURT'S QUESTION 4: Finally, the Supreme Court has "equivocated over which provision of the Constitution mandates" the *Anderson-Burdick* "balancing test." *Fish v. Schwab*, 957 F.3d 1105, 1144 n.3 (10th Cir. 2020). The Eleventh Circuit has explained that "burdens on voters implicate" the First Amendment right to associate and "a Fourteenth Amendment right 'to participate equally in the electoral process.'" *Democratic Exec. Comm. of Fla. v. Lee*, 915 F.3d 1312, 1319 (11th Cir. 2019) (*Swanson v. Worley*, 490 F.3d 894, 902 (11th Cir. 2007)). Does this Court's *Anderson-Burdick* analysis change depending on whether Plaintiffs' claims implicate the First Amendment right to associate or rights guaranteed by the Fourteenth Amendment's Equal Protection Clause?

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Where *Anderson-Burdick* applies, the Court's analysis does not change depending on whether it views the rights at issue as arising under the First Amendment or the Equal Protection Clause. As *Anderson* explained, the relevant aspect of the Equal Protection Clause for *Anderson-Burdick* is the "'fundamental rights' strand of equal protection analysis." *Anderson*, 460 U.S. at 786 n.7. Under that strand of analysis, heightened scrutiny applies to classifications that burden fundamental rights, including the right to vote. *See Williams v. Rhodes*, 393 U.S. 23, 31 (1968); *see also Harper v. Va. State Bd. of Elections*, 383 U.S. 663, 670 (1966)

("We have long been mindful that where fundamental rights and liberties are asserted under the Equal Protection Clause, classifications which might invade or restrain them must be closely scrutinized and carefully confined."). This aspect of the Equal Protection Clause requires a heightened justification for laws that burden some citizens' exercise of voting rights, even if the lines are drawn based on categories (such as wealth or the payment of a tax) that would in other contexts be subject only to rational basis review. *See Harper*, 383 U.S. at 669.

In this way, the Equal Protection and First Amendment bases for *Anderson-Burdick* are not distinct; rather, each is grounded in the fundamental nature of the right to vote, which justifies subjecting electoral regulations to a higher level of constitutional scrutiny than most other governmental regulations are subject to.

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Of course, other First Amendment and Fourteenth Amendment causes of action remain available to plaintiffs where applicable based on the facts of the case. *See*, *e.g.*, *McIntyre v. Ohio Elections Comm'n*, 514 U.S. 334, 344-45 (1995) (holding that *Anderson-Burdick* was inapplicable to a law that "does not control the mechanics of the electoral process" but was instead "a regulation of pure speech"); *Meyer v. Grant*, 486 U.S. 414, 421-22 (1988) ("Thus, the circulation of a petition involves the type of interactive communication concerning political change that is appropriately described as 'core political speech.'"); *Carrington v. Rash*, 380 U.S. 89, 94 (1965) ("'Fencing out' from the franchise a sector of the population because

of the way they may vote is constitutionally impermissible."); *Johnson v. Governor of Fla.*, 405 F.3d 1214, 1218 (11th Cir. 2005) ("Of course, the Equal Protection Clause prohibits a state from using a facially neutral law to intentionally discriminate on the basis of race.").

Respectfully submitted this 26th day of February, 2022.

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I HEREBY CERTIFY that on February 26, 2022 I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel in the Service List below.

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