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

PLAINTIFFS' JOINT BRIEF IN RESPONSE TO COURT'S ORDER REQUESTING BRIEFING ON STANDING REGARDING SOLICITATION DEFINITION CHALLENGE

Pursuant to the Court's March 4 Amended Order for Supplemental Briefing (ECF No. 657), Plaintiffs in the above-captioned consolidated cases respond to the Court's questions as follows:

COURT'S QUESTION: Assuming *arguendo* this Court finds that one Plaintiff proved they have standing to pursue an injunction for a facial vagueness challenge to the Solicitation Definition, section 102.031(4)(a)-(b), Florida Statutes (2021), with respect to a specific Defendant Supervisor of Elections,

but not other Supervisors of Elections, what authority, if any, allows this Court to enjoin all Supervisors of Elections based on that Plaintiff's facial challenge?

A. The overbreadth doctrine allows the Court to enjoin all 67 Supervisors from enforcing a facially unconstitutional statute

Under the scenario that the Court asks Plaintiffs to assume, the overbreadth doctrine would allow the Court to enjoin all 67 Supervisors from enforcing the Solicitation Definition to avoid chilling protected First Amendment expression under a facially invalid statute. "[T]he scope of injunctive relief is dictated by the extent of the violation established," *Califano v. Yamasaki*, 442 U.S. 682, 702 (1979), and a finding of facial invalidity due to vagueness means that the statute may never be constitutionally enforced.

The rule allowing a facial vagueness challenge in the First Amendment context is a species of the overbreadth doctrine: "When asserting a facial challenge, a party seeks to vindicate not only his own rights, but those of others who may also be adversely impacted by the statute in question." *City of Chicago v. Morales*, 527 U.S. 41, 55 n.22 (1999) (plurality opinion). "A plaintiff who has established constitutional injury under a provision of a statute as applied to his set of facts may also bring a facial challenge, under the overbreadth doctrine, to vindicate the rights of others not before the court under that provision." *CAMP Legal Defense Fund, Inc. v. City of Atlanta*, 451 F.3d 1257, 1271 (11th Cir. 2006). The "usual rule . . . that a party may assert only a violation of its own rights" is relaxed, and "'[l]itigants . . .

are permitted to challenge a statute not because their own rights of free expression are violated, but because of a judicial prediction or assumption that the statute's very existence may cause others not before the court to refrain from constitutionally protected speech or expression.'" *Virginia v. Am. Booksellers Ass'n, Inc.*, 484 U.S. 383, 392-93 (1988) (alterations in original) (quoting *Sec'y of State of Maryland v. J.H. Munson Co.*, 467 U.S. 947, 956-57 (1984)).

Notwithstanding the overbreadth doctrine, a plaintiff bringing a facial vagueness claim must always show that the challenged statute is vague as applied to his own conduct. *Holder v. Humanitarian Law Project*, 561 U.S. 1, 20 (2010). A plaintiff may do so by demonstrating that the law provides no reliable standard for what is or is not proscribed under any circumstance. *See Coates v. City of Cincinnati*, 402 U.S. 611, 614 (1971) (invalidating an ordinance on vagueness grounds not because it "require[ed] a person to conform [their] conduct to an imprecise but comprehensible normative standard, but rather in the sense that no standard of conduct is specified at all"); *see also Morales*, 527 U.S. at 71 (Breyer, J., concurring) ("The ordinance is unconstitutional, not because a policeman applied this discretion wisely or poorly in a particular case, but rather because the policeman enjoys too much discretion in *every* case."). And in any overbreadth case, a plaintiff must still demonstrate that the constitutional minimum of standing is met: that 'the plaintiff himself has suffered some threatened or actual injury resulting from the putatively

illegal action.'" *CAMP Legal Def. Fund*, 451 F.3d at 1270 (11th Cir. 2006) (quoting *Warth v. Seldin*, 422 U.S. 490, 499 (1975)).

Once a plaintiff has made those showings, however, the overbreadth doctrine allows him to also assert the rights of third parties not before the court in challenging that same statute. *See Am. Booksellers Ass'n*, 484 U.S. at 393 (explaining that bookseller plaintiffs "have alleged an infringement of the First Amendment rights of bookbuyers"). Otherwise, the "protected speech of others may be muted and perceived grievances left to fester because of the possible inhibitory effects of overly broad statutes." *Broadrick v. Oklahoma*, 413 U.S. 601, 612 (1973).

The Court's question assumes that at least one Plaintiff has made the necessary showings: that is, that one Plaintiff with standing to sue at least one defendant has shown that the Solicitation Definition is facially unconstitutional because it is vague in all potential applications. If so, the Court can and should enjoin all 67 Supervisors from enforcing that statute, to avoid chilling the expression and expressive conduct of the one Plaintiff with standing *and all other potentially affected persons* under a statute that the Court has found is too vague to ever be constitutionally enforced. Doing so will also promote "uniformity in the interpretation and implementation of" the Solicitation Definition, the importance of which Defendant Lee emphasized in successfully seeking to intervene to defend the Solicitation Definition. *See* ECF No. 337-1, at 2-3, 7; ECF No. 359.

B. The Court's posited assumption that a Plaintiff has standing only against a single Supervisor is not consistent with the factual record and applicable legal standards.

The Court's question directed Plaintiffs to assume that the Court finds standing to challenge the Solicitation Definition against only a single Supervisor. To the extent that the Court's question may suggest that it is considering such a conclusion, Plaintiffs respectfully submit that it would be inconsistent with the law and facts in this case given the nature of Plaintiffs' asserted self-censorship injuries from the Solicitation Definition and the purely prospective relief that Plaintiffs seek.

In federal-law challenges to the enforceability of a state statute, the correct defendants—to whom plaintiffs' injuries from the statute may be traced, and against whom redress may be obtained—are "the officials who enforce the challenged statute." *Jacobson v. Fla. Sec'y of State*, 974 F.3d 1236, 1255 (11th Cir. 2020); *see also, e.g.*, *Strickland v. Alexander*, 772 F.3d 876, 885-86 (11th Cir. 2014); *ACLU v. The Florida Bar*, 999 F.2d 1486, 1490 (11th Cir. 1993) Thus, as *Jacobson* held, injury from a Florida law enforced by the Supervisors of Elections "would be traceable only to 67 Supervisors of Elections and redressable only by relief against them." *Jacobson*, 974 F.3d at 1253. *Jacobson* went on to instruct what a plaintiff should do in a future suit: "sue[] the Supervisors of Elections instead of the Secretary of State," because while that would mean "more defendants . . . *nothing prevent[s]*

the voters and organizations from taking that course of action." *Id.* at 1258 (emphasis added). That is precisely what Plaintiffs did here.

Moreover, Plaintiffs' demonstrated injury-in-fact is statewide, rather than limited to any particular Supervisor. Plaintiffs allege self-censorship injury under the rule that "an actual injury can exist when the plaintiff is chilled from exercising her right to free expression or forgoes expression in order to avoid enforcement consequences." *Harrell v. The Florida Bar*, 608 F.3d 1241, 1254 (11th Cir. 2010) (quoting *Pittman v. Cole*, 267 F.3d 1269, 1283 (11th Cir. 2001) (alterations in original)). Specifically, much as in *Harrell*, Plaintiffs showed that they would like to engage in expression and expressive conduct near polling places but are concerned that the Solicitation Definition may be construed to prohibit—indeed, criminalize—that conduct and have therefore been chilled from engaging in such conduct. *See* ECF No. 649 at 21, 42, 46; ECF No. 652 at ¶¶ 521-52, 580, 657, 679, 713, 809, 838, 854, 863, 877, 1074. These demonstrated injuries-in-fact from the Solicitation Definition flow from all 67 Supervisors alike, because they concern self-censorship of the future activities of statewide organizations. *See* ECF No. 649 at 21, 32-33, 42, 45-46; ECF No. 652 at ¶¶ 14, 182, 577, 686, 784, 809, 853, 883. Nothing in the record suggests that the activities Plaintiffs would engage in were it not for the Solicitation Definition would be limited to just one county.

It makes no difference that some Supervisors testified that they previously prohibited all interactions with voters in the buffer zone under different statutory provisions. Multiple Plaintiffs clearly testified that they used to engage with voters in the buffer zone (even in places where Supervisors testified that such conduct was prohibited before SB90), and now will not do so. *See* ECF No. 649 at 19-21, 45-46; ECF No. 652 at ¶¶ 251-52, 577, 678, 794-95, 809, 838, 853-54, 862-63, 1074. That evidence, too, applies statewide and would not be restricted to any one Supervisor.

Moreover, as the Eleventh Circuit has explained, for the existence of a "different unchallenged provision" prohibiting Plaintiffs' conduct to destroy redressability, that provision must "inarguably preclude[] a plaintiff's relief." *Tokyo Gwinnett, LLC v. Gwinnett Cnty., Ga.*, 940 F.3d 1254, 1266 (11th Cir. 2019). Here, the other legal provisions that some Supervisors rely on to prohibit all contact with voters in the buffer zones do not "inarguably preclude[]" such contact—rather, they provide only for the maintenance of order at the polls, and must be construed in the context of the more specific Solicitation Definition, which prohibits some, but not all, such conduct. *See* ECF No. 649 at 76-77; ECF No. 652 at 269-271. And a decision for Plaintiffs would redress Plaintiffs' injuries at least in part by eliminating the threat that they would be found to violate the Solicitation Definition, even if other provisions might remain an issue. *See, e.g.*, *Massachusetts v. EPA*, 549 U.S. 497, 525-26 (2007); *Larson v. Valente*, 456 U.S. 228, 242 (1982); *Care Comm. v.*

Arneson, 638 F.3d 621, 631 (8th Cir. 2011); *Weaver's Cove Energy, LLC v. R.I Coastal Res. Mgmt. Council*, 589 F.3d 458, 467-69 (1st Cir. 2009).

Thus, Plaintiffs urge the Court to find standing to challenge the Solicitation Definition as to all 67 Supervisors, not just one.

Respectfully submitted this 7th day of March, 2022.

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I HEREBY CERTIFY that on March 7, 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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