

IN THE
SUPREME COURT OF VIRGINIA

RECORD NO. 260127

DON SCOTT, in his official capacity as
Speaker of the House of Delegates, *et al.*,

Appellants,

v.

RYAN T. McDOUGLE, Virginia State Senator and Legislative
Commissioner for the Virginia Redistricting Commission, *et al.*,

Appellees.

REPLY BRIEF OF APPELLANTS DON SCOTT,
SCOTT SUROVELL, AND L. LOUISE LUCAS

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INTRODUCTION

Days ago, the people of the Commonwealth of Virginia ratified the proposed amendment, the culmination of a process in which the General Assembly strictly complied with the Constitution's requirements. Appellees nonetheless ask this Court to overturn the will of the people to invalidate the amendment. They offer three arguments to support that extraordinary request. All three ask this Court to expand upon Article XII's requirements for amending the Constitution. None has merit.

ARGUMENT

I. The Constitution Imposes No Subject-Matter or Duration Limit on Special Sessions.

Appellees' arguments that the General Assembly did not validly pass the proposed amendment fail because the Constitution imposes no subject-matter or duration limit on special sessions. On April 17, 2024, the General Assembly unanimously passed House Joint Resolution 428, which requested that the Governor convene the legislature into special session pursuant to Article IV, Section 6 of the Virginia Constitution. H.J.R. 428 (2024 Sess.). On October 31, 2025, the General Assembly passed House Joint Resolution 6007, which proposed the constitutional amendment at issue in this case. H.J.R. 6007 (2024 Sess.). It is

undisputed that the General Assembly did not adjourn *sine die* the special session until January 14, 2026. Accordingly, the General Assembly validly passed the proposed amendment.

Appellees do not defend a principal basis for the circuit court's holding to the contrary. The circuit court reasoned that the General Assembly "fail[ed] . . . to follow its own Resolutions in adding the proposed Constitutional Amendment to the scope of business that may come before the 2024 Special Session." R597. This Court recognized that rationale as the basis of the circuit court's decision. *See Koski v. Republican National Committee*, ___ Va. ___, 926 S.E.2d 289, 292 (Va. 2026) (characterizing the circuit court's holding as "[t]he General Assembly violated its own rules by improperly expanding the scope and purpose of the 2024 Special Session to consider and pass the proposed constitutional amendment, and thus, the first passage of the proposed constitutional amendments is void ab initio."). Appellees are right to abandon the circuit court's view. Courts lack the power to enforce legislative rules, and in any event the General Assembly complied with its rules. *See Op. Br.*, at 15-27.

Appellees instead advance two alternative arguments, neither of which holds merit. First, Appellees suggest that the General Assembly

improperly expanded the 2024 Special Session beyond the scope of its initial application to the Governor pursuant to Article IV, Section 6 of the Virginia Constitution. According to appellees, the General Assembly “while in special session can transact no business except that for which it was called together.” Appellees Br., at 13 (quoting *Arrow Club, Inc. v. Neb. Liquor Control Comm’n*, 131 N.W.2d 134, 137 (Neb. 1964)). Appellees err in seeking to engraft upon Section 6 a limitation that is absent from the Constitution the people adopted.

As appellees concede, their manufactured “subject-matter limit” is not “explicit in the constitution.” Appellees Br., at 14. Lacking any support in this Court’s cases, appellees instead rely on cases from other states. The fatal flaw in that reliance is that every one of those states’ constitutions explicitly empowers either the legislature or the governor to specify—and limit—the subject matter of a special session. *See Arrow Club*, 131 N.W.2d at 137 (“The Governor may, on extraordinary occasions, convene the legislature by proclamation, stating therein the purpose for which they are convened, and the legislature shall enter upon no business except that for which they were called together.” (quoting Neb. Const., art. IV, § 8)); *State ex rel. Conway v. Versluis*, 120 P.2d 410,

414 (Ariz. 1941) (similar); *Commonwealth ex rel. Schnader v. Liveright*, 161 A. 697, 703 (Pa. 1932) (similar).

The absence of a corresponding provision in the Virginia Constitution to limit the scope of special sessions is dispositive. By its text, Article IV, Section 6 authorizes the General Assembly to call for a special session by two-thirds majority but does not authorize it to limit the subject matter of that session or to impose a continuing supermajority requirement on legislation within it. Once the Governor has convened the special session, ordinary parliamentary rules govern the business before the General Assembly. Appellees' contrary rule would effectively constitutionalize a legislative procedural resolution—H.J.R. 6001—and impose a subject-matter limit found nowhere in the Constitution.

The Constitution's structure confirms that conclusion. Elsewhere in Section 6, the Constitution expressly limits the scope of reconvened sessions. *See* Va. Const., art. IV, § 6 (“No other business shall be considered at the reconvened session.”). Section 6 thus draws a textual contrast between reconvened sessions, whose subject matter the Constitution expressly limits, and special sessions, whose subject matter it does not. The framers of the 1971 Constitution thus knew how to tie a

session's scope to its calling; they did so for reconvened sessions and declined to do so for special sessions. That omission—reinforced by their choice not to follow sister states in adopting an express limitation on special sessions—demonstrates that the Constitution neither limits the scope of special sessions nor authorizes the General Assembly or Governor to do so. *See Jordan v. Commonwealth*, 295 Va. 70, 75 (2018).

Second, appellees contend that the 2024 Special Session terminated when the General Assembly convened its general session. The circuit court correctly rejected that contention. *See* R596. The text of the Constitution contains no limitation on the length of a special session. By contrast, Section 6 expressly limits the duration of reconvened sessions. Va. Const., art. IV, § 6 (“Such reconvened session shall not continue longer than three days unless the session be extended, for a period not exceeding seven additional days, upon the vote of the majority of the members elected to each house.”). That textual difference between reconvened sessions and special sessions again demonstrates a difference in meaning. *See Morgan v. Commonwealth*, 301 Va. 476, 482 (2022) (“The omission of this language is telling as it indicates that the General Assembly did not intend for the two statutes to mean the same thing.”).

Moreover, as the circuit court recognized, appellees themselves continued special sessions in 2018 and 2022 “in the same manner.” *Id.* And as appellees recognize, that prior practice “sheds ‘light’” on the meaning of Section 6. Appellees Br., at 24 (citation omitted).

Appellees’ argument to the contrary lacks merit. Lacking support in this Court’s cases, appellees again rely solely on inapposite out-of-state precedent. In *Opinion of the Justices*, the Alabama Supreme Court considered the provision in its constitution that authorized the governor to call the legislature into an “extraordinary” session expressly limited in scope to the business specified in the governor’s proclamation. 152 So.2d 427, 428 (Ala. 1963). The court held that because the Alabama Constitution “provide[s] for the convening of the legislature under extraordinary circumstances,” “no reason” for the extraordinary session exists when “the legislature is already in regular session.” *Id.* Because the Virginia Constitution neither limits the subject matter of special sessions nor restricts the circumstances in which they may be called, it also does not include the duration limit the Alabama court inferred. Appellees’ inapposite cases cannot override the text of the Virginia Constitution or the historical practice of the General Assembly.

II. The General Election Took Place on Election Day.

The General Assembly complied with Article XII's requirement to refer the proposed amendment to the session after the "next general election." The General Assembly passed the proposed amendment on October 31, 2025. H.J.R. 6007 (2024 Sess.). Virginia then held a general election "on the Tuesday succeeding the first Monday in November." Va. Const., art. IV, § 3. The General Assembly subsequently passed the proposed redistricting amendment a second time on January 16, 2026, during its 2026 general session. H.J.R. 4 (2026 Sess.). The General Assembly then submitted the proposed amendment to Virginia's voters, who ratified it in a special election held on April 21, 2026. The General Assembly thus strictly complied with every requirement imposed by Article XII.

The text of the Constitution compels that conclusion. Article II, Section 6 provides that "[t]he districts delineated in the decennial reapportionment law shall be implemented for the November general election." Va. Const., art. II, § 6. The "November general election" must take place in November, not over a three-month period beginning in September. Article IV further provides that the members of the General

Assembly “shall be elected . . . on the Tuesday succeeding the first Monday in November.” Va. Const., art. IV, §§ 2, 3 (emphasis added); *id.* at art. VII, § 4 (same). The Constitution thus defines the general election to take place “on” a day in November—not “by” or “ending on” that date.

These provisions preclude appellees’ redefinition of “general election” to include the period of early absentee voting that precedes it. See *Levick v. MacDougall*, 294 Va. 283, 295 n.11 (2017) (“It is not the function of the courts to add to or amend clear statutory language.”) (cleaned up); *Johnson v. Commonwealth*, 58 Va. App. 625, 641 (2011) (“[W]e are unwilling to judicially graft such a requirement under the subtle guise of judicial interpretation. We can only administer the law as it is written.”) (cleaned up).

Appellees ask this Court to depart from the plain text of the Constitution based on colloquial usage. They cite several press reports and a Facebook post that refer to the election taking place during the period of early voting. They also cite several cases applying the *Purcell* principle that bars federal courts from changing voting procedures *before* an election, and which say nothing about the legal definition of the general election. Neither that colloquial usage nor the *Purcell* cases can

supplant the definition of “general election” contained in the Constitution itself. “[W]hen the General Assembly has used words of a plain and definite import, courts cannot place on them a construction that amounts to holding that the General Assembly meant something other than that which it actually expressed.” *Vaughn, Inc. v. Beck*, 262 Va. 673, 677 (2001). *See also, e.g., Meese v. Keene*, 481 U.S. 465, 484 (1987) (“It is axiomatic that the statutory definition of the term excludes unstated meanings of that term.”); *Enriquez v. Commonwealth*, 722 S.E.2d 252, 255 (2012) (“[T]he statutory definition . . . is controlling.”).

Appellees also invert the implication of the federal cases upholding early voting under the federal Election Day statute. That statute sets “[t]he Tuesday next after the 1st Monday in November, in every even numbered year . . . as the day for the election.” 2 U.S.C. § 7. *See also* 3 U.S.C. § 1. According to appellees, the cases hold that “‘early voting’ is part of the election that ends on election day.” Appellees Br., at 31 (citing *Voting Integrity Project v. Bomer*, 199 F.3d 773, 774 (5th Cir. 2000); *Voting Integrity Project v. Keisling*, 259 F.3d 1169, 1176 (9th Cir. 2001); *Millsaps v. Thompson*, 259 F.3d 535 (6th Cir. 2001)). That is the opposite of their true holding. Those cases, following the Supreme Court’s decision

in *Foster v. Love*, 522 U.S. 67 (1997), explain that “[t]he *Foster* definition of ‘election’ implies that there is only a single election day . . . when the election is ‘consummated,’ even though there are prior voting days.” *Keisling*, 259 F.3d at 1176. It is precisely because early voting precedes the general election, and does not expand it, that early voting is consistent with the federal definition of a single “day for the election.” Moreover, federal law *requires* states to offer early absentee voting for certain voters. 52 U.S.C. § 20302. Appellees’ understanding would set federal law at war with itself to both require and prohibit early voting.

For a century and a half, it has been clear that early absentee voting does not expand the general election beyond a single day. Congress set a single day for congressional elections in 1845. *See* Act of Jan. 23, 1845, ch. 1, 5 Stat. 721. Early absentee voting “began during the Civil War as a means of providing soldiers the ability to vote.” *Keisling*, 259 F.3d at 1175 (citation omitted). That settled understanding long predates both the Constitution’s definition of the general election as a single day and the Commonwealth’s early absentee voting law. *See* Va. Const., art. V, §§ 2-3 (1870); *Moore v. Pullem*, 150 Va. 174, 189–90 (1928). It is this Court’s “duty [to] honor the original public meaning of th[e] [Constitution’s] provisions.” *Vlaming v. W. Point Sch. Bd.*, 302 Va. 504, 527 (2023).

Appellees press this Court to rewrite the Constitution’s definition of “general election” to impose a policy-based notice requirement the Constitution does not contain. The framers of the 1971 Constitution already answered the question by intentionally eliminating Article XII’s publication requirement. *See infra* Part III. This Court should reject appellees’ request to replace the original meaning with their policy-driven expansion of the constitutional definition of the “general election.”¹

III. The Repealed Virginia Code Section 30-13 Cannot Invalidate the Constitutional Amendment.

The General Assembly strictly complied with Article XII, and the people of the Commonwealth approved the amendment. Appellees seek to undo that democratic outcome by adding a requirement not found in the Constitution. On their view, the General Assembly’s failure to comply with a repealed statute that once implemented a constitutional requirement that no longer exists warrants this Court overriding the will of the people who ratified the amendment. Their arguments lack merit.

¹ Appellees suggest (at 31) that this Court in *Koski* indicated that early voting constitutes the “holding of an election.” That is incorrect. This Court simply stayed the circuit court’s injunction of the election in its entirety—not just early voting—as an impermissible intrusion into the electoral process. *Koski* itself “offer[ed] no opinion on the ultimate resolution” of the merits. ___ Va. ___, 926 S.E.2d at 292.

First, appellees are fundamentally mistaken about the constitutional status of Section 30-13. They claim that Section 30-13 was an exercise of the General Assembly’s power to “‘prescribe’ the ‘manner’ in which ‘to submit such proposed amendment or amendments to the voters.’” Appellees Br., at 37 (quoting Va. Const. art. XII, § 1). That is incorrect. Article XII directs the General Assembly to “submit such proposed amendment or amendments to the voters qualified to vote in elections by the people, in such manner as it shall prescribe and not sooner than ninety days *after final passage by the General Assembly*.” Va. Const., art. XII, § 1 (emphasis added). The General Assembly satisfied that directive by scheduling the referendum for April 21, 2026, in which the people passed the proposed amendment. H.B. 1384 (2026 Sess.).

Appellees’ mistake is seeking to transmute Article XII’s requirement to prescribe the manner of the special election *after* the General Assembly’s final passage of the proposed amendment into a publication requirement *prior* to the intervening general election. Until the adoption of the current Constitution in 1971, the 1902 Constitution required that, after initial approval by the General Assembly, a proposed amendment “shall be published for three months previous to the time of

such election.” Va. Const. § 196 (1902). The predecessor to Section 30-13 implemented that requirement prior to the intervening election between the General Assembly’s first and second passage of the proposed amendment. The 1971 Constitution eliminated that requirement. *See* Del. D. French Slaughter, Jr., *Proceedings and Debates of the House of Delegates Pertaining to Amendment of the Constitution* 496 (1969). *See also* 1 A.E. DICK HOWARD, COMMENTARIES ON THE CONSTITUTION OF VIRGINIA 1175 (1974) (Article XII “does not require publication of amendments, only a delay of ninety days” prior to the referendum and therefore “an amendment cannot be challenged on the ground that publication was insufficient”). Accordingly, Section 30-13 did not implement any requirement in the 1971 Constitution.

Second, because Section 30-13 did not implement a constitutional requirement, enforcing the defunct statute would constitute adding an extra-constitutional requirement for amending the Constitution. This Court demands “strict compliance” with the procedures Article XII actually requires. *Coleman v. Pross*, 219 Va. 143, 154 (1978). That precludes both adding and subtracting from those procedures. The General Assembly lacks the authority to add requirements beyond those

listed in Article XII. *See City of Richmond v. Lynch & Duke*, 106 Va. 324, 325–26 (1907) (rejecting attempt to “superadd” requirement beyond Virginia Constitution). *See also Powell v. McCormack*, 395 U.S. 486, 543 (1969) (“Congress, by the Federal Constitution . . . must be governed by the rules prescribed by the Federal Constitution, and by them only.”) (quoting 17 Annals of Cong. 872 (1807)).²

Third, even if Section 30-13 could have added to the constitutional requirements established by Article XII, by its terms it was a directory rather than mandatory statute. Appellees’ sole argument that Section 30-13 was mandatory is that this Court demands strict compliance with constitutional requirements. *See* Appellees Br., at 37–39. But because Section 30-13 did not implement a publication requirement, which was intentionally omitted in the 1971 Constitution, that principle does not apply. By its own terms, Section 30-13 directed action by a public official. *See Bland-Henderson v. Commonwealth*, 303 Va. 211, 220 (2024). This

² Appellees again rely on inapposite out-of-state cases to claim that “many courts have invalidated proposed constitutional amendments for statutory infirmities.” Appellees Br., at 38 (citing *Nevadans for Nevada v. Beers*, 142 P.3d 339, 351 n.51 (Nev. 2006)). *Beers* and every case collected in it concerned statutes implementing an express constitutional provision absent here. *See, e.g., Watland v. Lingle*, 85 P.3d 1079, 1090 (Hawai’i 2004); *Op. of the Justs.* 664 N.E.2d 792, 796 (1996).

Court has long held that such statutes are merely directory, and imperfect compliance by the official does not necessitate invalidating an election. *See Huffman v. Kite*, 198 Va. 196, 199 (1956); *Gregory v. Hubbard*, 123 Va. 510, 512–13 (1918). So too here.

Fourth, the General Assembly’s repeal of Section 30-13 has retroactive effect. “Virginia case law is clear that [the] presumption [against retroactivity] can be overcome . . . when the General Assembly uses explicit terms detailing the retroactive effect of the legislation.” *Montgomery v. Commonwealth*, 75 Va. App. 182, 190 (2022). The General Assembly included such an express provision for retroactive effect in its repeal of Section 30-13. *See* H.B. 1384 (2026 Sess.) § 16. Moreover, even if that express provision were absent, Section 30-13 did not create any substantive rights that would preclude retroactive effect because it governed only the procedure of constitutional amendment. *See Shiflet v. Eller*, 228 Va. 115, 120 (1984).

CONCLUSION

The judgment of the circuit court should be reversed.

Respectfully submitted,

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