

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

LEAGUE OF WOMEN VOTERS OF THE
UNITED STATES, *et al.*

Plaintiffs,

v.

UNITED STATES CITIZENSHIP AND
IMMIGRATION SERVICES, *et al.*

Defendants.

Case No. 8:25-cv-03777-ABA

NATIONAL CONFERENCE OF JEWISH
WOMEN, GREATER NEW ORLEANS
SECTION

Plaintiff,

v.

UNITED STATES CITIZENSHIP AND
IMMIGRATION SERVICES, *et al.*

Defendants.

Case No. 8:25-cv-03675-ABA

THE LEAGUE PLAINTIFFS' NOTICE OF SUPPLEMENTAL AUTHORITY

Plaintiffs the League of Women Voters of the United States, League of Women Voters Education Fund, League of Women Voters of Colorado, League of Women Voters of New Jersey, League of Women Voters of New Jersey Education Fund, League of Women Voters of Saratoga County, League of Women Voters of the Charleston Area, and League of Women Voters of Milwaukee County ("League Plaintiffs") respectfully file this notice of supplemental authority to alert this Court to the recently issued opinion of the Missouri Supreme Court, sitting en banc, in

State of Mo. v. League of Women Voters of Mo., No. SC100997, 2026 WL 816122 (Mo. Mar. 24, 2026), attached as Exhibit A, which bears on issues relevant to the League Plaintiffs’ Motion for Preliminary Injunction and Defendants’ Motion to Dismiss, ECF Nos. 21, 27, 30, 33, 35, 36, 42. The Missouri Supreme Court’s holdings are, in particular, relevant to Count III of Plaintiffs’ Complaint.

At the March 17, 2026 hearing addressing both motions, the Court inquired about whether all parts of the voter registration process are inherently expressive for First Amendment purposes such that voter registration speech is entitled to the same level of constitutional protection as speech related to the ballot petition process. *See* Tr. at 25:14-27:20 (Mar. 17, 2026); *see also id.* at 55:11-57:16. The Missouri Supreme Court’s recent decision directly addressed that question.

In analyzing and applying *Meyer v. Grant*, 486 U.S. 414 (1988), the Missouri Supreme Court explicitly recognized that both “restrictions on the solicitation of voter registration applications and the prohibition on the solicitation of absentee ballot applications naturally involve core political speech. Solicitation requires one to speak to a person regarding an issue of societal concern—participation in the democratic process—and involves advocacy for political change.” *State of Mo.*, 2026 WL 816122, at *7 (citing *Meyer*, 486 U.S. at 421-22); *see also id.* at *8 n.20 (noting that “[o]ther courts have also found solicitors seeking voter registration are entitled to the same protection as initiative petition circulators”).

In sum, “[a]ny solicitor aiming to convince a person to apply for either voter registration or an absentee ballot would have to communicate with and persuade that person of the merits of voting.” *Id.* at *7. And “[e]ncouraging others to vote is pure speech and, as core First Amendment activity, is entitled to the same protection as the circulation of an initiative petition.” *Id.* at *8. That is so because (1) “[d]iscussion of whether to register to vote and participate in the democratic

process is a matter of societal concern,” and (2) “[t]his speech also closely relates to political change, with solicitors expressing their desire for broader political participation in elections and discussing the merits of making one’s voice heard in the ballot box.” *Id.* at *8 (citing *Lichtenstein v. Hargett*, 83 F.4th 575, 586 (6th Cir. 2023)).

The Missouri Supreme Court’s recent decision further recognizes that, when a government restriction infringes on core political speech, it is “immaterial” that “the challengers had other means by which to disseminate their ideas,” because the “First Amendment protected the challengers’ right to advocate as well as to select what they believed to be the most effective means for doing so.” *Id.* at *7 (citing *Meyer*, 486 U.S. at 424).

Finally, the Missouri Supreme Court’s recent decision confirms that “the constitution’s protection for core political speech”—including restrictions on the voter registration process, like those at issue in this case—“is subject to strict scrutiny.” *Id.* at *10 (citing, *inter alia*, *Buckley v. Am. Const. L. Found., Inc.*, 525 U.S. 182, 192 n.12 (1999)).

Dated: April 8, 2026

Respectfully submitted,

/s/ Bruce V. Spiva

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CERTIFICATE OF SERVICE

I hereby certify that on April 8, 2026, I filed a copy of the foregoing with the Clerk of the Court using the CM/ECF system.

/s/ Bruce V. Spiva
Bruce V. Spiva

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